

AIR QUALITY ADVISORY COUNCIL
Minutes – July 5, 2011

Members/alternates present: Jan Hoem, John Garberson, Guy Hanson, Bill Flanery, Patricia Hogan

Members/alternates absent: Tova Sardot, Beth Berlin, Garon Smith, Sue Spanke, Mark Loeffelbein, George Hart, Katie Lane, Bert Chessin

Staff: Ben Schmidt

Public: Brennan Skrutvold

- 1. John Garberson called the meeting to order.**
- 2. Excused absences recognized:** Tova Sardot, Katie Lane, Beth Berlin, George Hart, Bert Chessin, Mark Loeffelbein and Garon Smith were absent.
- 3. Agenda approved.**
- 4. Minutes:** The June 7, 2011, minutes were approved.
- 5. Public comment on non-agenda items:**
None.

6. Article Presentation:

Patricia Hogan presented the website “Don’t Top Off Your Tank!” and an article, “Natural gas from fracking could be ‘dirtier’ than coal, Cornell professors find.” Patricia said that more methane gas leaks into the environment through the fracking technique for natural gas extraction, and the flaming faucets would be one example of this. Leakage could be greatly reduced throughout the natural gas industry.

Ben Schmidt told the group that he had just returned from a conference where a presentation was given on new ways to detect natural gas leaks by using equipment that operates in the non-visible wavelengths.

John Garberson mentioned that Wyoming is having trouble with air quality because of natural gas drilling. People’s health is being affected by this industrial activity and now the people of Wyoming are wrestling with how to deal with this issue.

Jan Hoem will present in September since the August meeting is canceled.

7. Request for solid fuel burning device regulation change – Brennan Skrutvold:

Brennan from EnviroHeat came to the Air Quality Advisory Council to request that the pellet stove regulations in the Missoula Air Stagnation Zone (ASZ) be changed to allow higher emitting pellet stoves. Right now only pellet stoves with a time-weighted average of 1 gram per hour or less may be installed inside the ASZ. Harman offers several pellet stoves with emissions in the 1.8 – 2.5 grams per hour range which do not qualify for installation in the ASZ.

Since most people in the county live inside the ASZ, this limits his market tremendously.

Brennan said that Harman pellet stoves have the best warranty in the market, highest BTU output and are the best looking pellet stoves available. They range in heat output between 38,000 Btu and 113,000 Btu per hour. Johnson Brothers own the Eureka Pellet Mill, which is a Montana mill, and offers a high grade of pellets and products. Pellet stoves can also heat a home for about ½ the cost of propane or electric base board heat.

Brennan also said that many old stoves on the Health Department approved list are not nearly as efficient, durable, or clean burning as the Harman Stoves available now. The Harman Stoves are thermostatically controlled, made in Pennsylvania, and are bottom fed, which reduces ash generation and improves combustion when compared to the normal top pellet feed systems.

John Garberson and Ben Schmidt told Brennan that a change of rules would be a very long term process. The rule change would have to pass the Air Pollution Control Board, City Council, County Commissioners, and the State Board of Environmental Review. Then, because this rule is in the State Implementation Plan, the Air Program would have to convince the EPA that the changed increase in allowable emissions does not represent a “back sliding.”

Patricia Hogan asked Brennan why the Council should pursue the rule change. Brennan said the Harmon stoves represent a new technology that generates less ash than previous pellet stoves. The fuel and the stove determine ash generation, so the Harman require less cleaning. The 1 gram per hour is a very strict limit and this limit seems to be the strictest in the country.

Bill Flanery told Brennan that he needed to explain the air quality benefits of his proposal. The economic benefits are worth mentioning but the Air Quality Advisory Council looks at air quality first.

Guy Hanson said that by the spring of 2012, New Source Performance Standards are due out for all residential scale solid fuel burning devices. The industry will most likely **not** do a lot of testing as they wait and see what the new standards will look like. So Harmon most likely would not be interested in doing testing, \$30,000 to \$50,000 per test, for the tiny Missoula market because of uncertainty on what the new testing requirements and emission rates will be.

Jan Hoem told Brennan that most of what he mentioned is not related to air quality. Air quality is the Council’s charge, not economics, and so he needs to address the air quality issues associated with his proposal. Brennan replied, saying that one way to look at this is the relative scale of emissions. There are more diesel trucks sold in the valley than pellet stoves and diesel trucks have a lot of emissions. The number of pellet stoves that could potentially be sold in the ASZ is quite small.

Ben told the group that chemical mass balance studies show that residential wood heat is the primary cause of high PM_{2.5} days in the Missoula Valley. Winter, with its inversions and increased need for residential space heating, causes increased wood stove use. Diesel emissions are probably spread more equally through the seasons. Whenever the woodstove rules come up for revisions, the idea of using an emission rate standard based on material burned (g/kg) versus the EPA testing method of emission by g/hr comes up. The g/hr has mostly been kept because it is the standard testing method used by the EPA for residential size wood appliances. Also, there is an argument that in the Missoula Valley, each property can only be allowed to emit so much

pollution. As the population of the valley increases, the amount each person can emit decreases if we wish to stay in attainment with the national PM_{2.5} standards.

Patricia Hogan said she would consider looking at this issue because the emissions are not prorated for the size of unit. Right now the rules look at g/hr emissions and not g/kg material burned. John Garberson encouraged Brennan to go upstream to Harmon to get the stove emissions to meet Missoula County's rules. It is unlikely that the Council would support his request to change the rules and allow higher emitting pellet stoves into the ASZ.

The group decided to put EnviroHeat's request for a change in the pellet stove rules on the September AQAC agenda as an action item so more Council members could have a chance to be involved in the issue. This allows the group to take an action if they choose, but they are not required to take an action. Guy Hanson said he would prefer to not vote on the issue since he has commercial interest in the area.

The group continued its discussion to include suggestions for future AQAC agendas and air quality. John Garberson said that in the near future, he would like to see a presentation for the AQAC on the Clean Air Act. Additionally, an explanation of the AQAC's role and how it is supposed to function would be good to have. If the group more clearly understood their role, they may not have to ask as often if they can do certain activities. Guy said that some potential actions that could be taken to improve air quality in the valley would be to request the university remove woodstoves equal to their biomass boiler emissions, that 100 moisture meters be purchased and delivered to homeowners as part of an educational burn clean program or that a dialogue with the Missoula City-County Health Department and other groups be started to look at ways to finance a woodstove change out program.

8. Staff report

Benjamin Schmidt gave the staff report.

Garon Smith could not make the meeting, but he had two comments to share with the AQAC. Pertaining to the university biomass boiler, Garon pointed out that the AQAC helped pass the 2010 air rules that the boiler was complying with and the rules cannot be changed part way through the permitting process. The desire to reduce emissions is understandable, so in the future the AQAC could look at proposing rules that require mitigation fees or actions for new commercial/industrial PM_{2.5} emitters.

Bill Flanery thanked Garon for supplying to the Council an article on how Europe is discouraging auto traffic. Right now Missoula occasionally closes Higgins to motor vehicle traffic; maybe the AQAC should look at the possibilities for a permanent street closure somewhere in Missoula. John Garberson said he is concerned with parking garages using prime real estate. Pedestrian traffic should be a priority. On that subject, Patricia Hogan mentioned a Missoula in Motion statistic that there are seven parking spaces in Missoula for each person.

Ben Schmidt continued his report by telling the Council that the final decision has been made to issue an air quality permit to the UM for their biomass boiler. In addition, last month Ben attended an industrial permitting and compliance conference and Sarah Coefield attended the annual Air and Waste Management Conference.

General discussion ensued on the fact that the Department Administration declined to allow the

AQAC to send their UM boiler opposition letter to their cc's. John read Ellen's email and stated that this position is consistent with how things have been done in the past. John also pointed out that all members of the Air Board had copies of their letter available before the Board meeting. At the Board meeting the county attorney explained in detail why it was not appropriate for the Board to consider the letter. The Board is part of the legal permitting process and it would be inappropriate to take action on the letter at this time. It was pointed out that the letter and the AQAC's stance on the boiler made the Missoulian, so they did have an impact. John then read the statement he had made to the Board. There was a general feeling of unhappiness that the AQAC was not allowed to send their letter to other groups and individuals.

11. Public comment: n/a

12. Announcement

The next meeting will be September 6, 2011.

13. Adjourn