



75-2-301 Written Findings

For Rule Changes Proposed to the Missoula City-County Air Pollution Control Program
April 21, 2022

Montana Code Annotated (MCA) 75-2-301(3)(b) requires the Air Pollution Control Board to fulfill the provisions of MCA 75-2-301(4) when adopting an ordinance or local law that is more stringent than the comparable state law.

MCA 75-2-301(4) allows the Board to adopt a rule more stringent than comparable state or federal regulations or guidelines if they make a written finding after a public hearing and public comment and based on evidence that the proposed local standard or requirement:

- (A) protects public health or the environment of the area;
- (B) can mitigate harm to the public health or the environment; and
- (C) is achievable with current technology.

The written finding must reference information and peer-reviewed scientific studies contained in the record that form the basis for the board's or the local air pollution control program's conclusion. The written finding must also include information from the hearing record regarding costs to the regulated community that are directly attributable to the proposed local standard or requirement.

If an amendment is purely clarifying an existing rule, it is not subject to MCA 75-2-301(4).

Chapter 7: Outdoor Burning

- **Rule 7.110(1)(d)** allows the outdoor burning of natural vegetation generated off-site to be granted a conditional outdoor burning permit if the burning will occur via the temporary use of an air curtain burner or an air curtain destructor.
- **Rule 7.110(2)(c)** makes an exception to allow conditional outdoor burning permits to be issued for burns inside the Air Stagnation Zone if the burning will take place in an air curtain burner or an air curtain destructor.

Rule 7.110(1)(d) is a new rule that allows the outdoor burning of natural vegetation generated off-site to be granted a conditional outdoor burning permit if the burning will occur via the temporary use of an air curtain burner or an air curtain destructor. Currently, Missoula's rules limit conditional burn permits for material generated off-site to licensed landfills. However, the department recognizes the need for neighborhood-wide wildfire hazard risk reduction projects, which can create significant amounts of slash in the wildland urban interface. Under the current rules, neighborhoods are prevented from collecting their slash for disposal, and slash may only be burned on individual properties. The proposed rule change will allow conditional burn permits to be issued for the disposal of vegetative waste from these neighborhood hazard reduction projects.

This represents a relaxing of our rule and puts it more in line with the state, which allows the burning of untreated wood generated off-site if the Department of Environmental Quality determines the material is untreated wood waste and the burner receives departmental permission for the burn (ARM 17.8.604(2)). These are the requirements of a Missoula County conditional burn permit. Because Rule 7.110(1)(d) is a relaxing of a Missoula rule that brings it more in line with the state, **MCA 75-2-301(4) may not apply.**

Rule 7.110(2)(c) is an existing rule and is part of the Montana SIP. The proposed change makes an exception to allow conditional outdoor burning permits to be issued for burns inside the Air Stagnation Zone if the burning will take place in an air curtain burner or an air curtain destructor. Currently, Missoula's rules prohibit conditional burn permits inside the Missoula Air Stagnation Zone. This represents a relaxing of our rule and puts it more in line with the state, which does not limit conditional burn permits by location. **MCA 75-2-301(4) may not apply.**

Unlike the state, Rules 7.110(1)(d) and 7.110(2) limit conditional burn permits to the use of air curtain burners and air curtain destructors.

MCA 75-2-301(4) justification for changes to Chapter 7 are written below

Given Missoula County's history of particulate pollution, brush with PM_{2.5} non-attainment designation in 2007, and current PM₁₀ maintenance status, any loosening of current rules cannot constitute backsliding. In addition, biomass debris burning produces a significant amount of PM_{2.5}, a known human health hazard and criteria pollutant. PM_{2.5} causes reduced lung function, worsened asthma and COPD symptoms, increased risk of stroke, heart attack and death, and increased hospitalizations for respiratory diseases. Therefore, the proposed rule requires the use of air curtain burners or air curtain destructors for the issuance of conditional permits for disposal of vegetative waste generated off-site. Limiting conditional permits issued under this rule to the use of air curtain burners and air curtain destructors is more stringent than the state, which does not have a comparable requirement for conditional permits. Air curtain burners and air curtain destructors provide a clean burning avenue for the disposal of vegetative debris in neighborhood hazard reduction projects that would otherwise be denied a permit entirely.

Peer reviewed scientific studies: See bibliography.

Chapter 8: Fugitive Particulate

- **Rule 8.203(3)(b & c)** corrects reference errors.
- **Rule 8.203(3)(e)** removes an extra word.
- **Rule 8.208(1)** allows the health department to approve alternative areas for paving that are the same size and usage as an area required to be paved by other sections of Chapter 8.

Changes to Rule 8.203 fix a reference and a grammar error. Rule 8.208 deals with paving requirements and there are no comparable state or federal requirements for paving of vehicle use areas.

MCA 75-2-301(4) justification for changes to Chapter 8 are written below.

This rule change allows the health department to approve alternative areas for paving that are the same size and usage as an area required to be paved by other sections of Chapter 8. For example, an applicant could pave an existing gravel access road instead of a new parking lot off an existing gravel road. This way the pavement is

placed at a more logical pattern and a road with higher speeds than the parking area could be paved. This would reduce overall particulate pollution which impacts people's health.

This rule change involves commonly available paving methods.

Peer reviewed scientific studies: See bibliography.

Chapter 9: Solid Fuel Burning Devices (Wood Stoves)

- **Rule 9.102(5)** changes the definition of "EPA Method" to reference all of subpart AAA instead of just three sections and adds in the new 40 CFR Part 60 Subpart OOOO. These subparts cover the federal testing methods for woodstoves, pellet stoves, hydronic heaters, and furnaces. Fireplaces are still not covered by a federally required testing method or rules.
- **Rule 9.102(10)** adds in a definition for a Seeley Lake Wood Stove Zone.
- **Rule 9.102(11)** adds the word "disposal" to the definition of what is a solid fuel burning device.
- **Rules 9.102(11, 12 and 13)** are renumbered.
- **Rule 9.201(1)** adds the term Chapter 9 to the rule for clarification.
- **Rule 9.203** edited for clarification.
- **Rule 9.203(2)** corrects a spelling error.
- **Rule 9.204** is a new rule that specifies what solid fuel burning devices may be installed inside the Seeley Lake Wood Stove Zone.
- **Rule 9.205** renumbered rule and updated rule to coordinate and mesh with the 2015 New Source Performance Standards for wood stoves. This rule does not apply for new solid fuel burning device installation in the Missoula Air Stagnation Zone nor the Seeley Lake Wood Stove Zone.
- **Rule 9.205(1)(c)** fixes a grammar error, change .9 to 0.9.
- **Rule 9.205(4)** edited for clarification.
- **Rules 9.206 through 9.212** renumbered.
- **Rule 9.207(3 and 7)** inserted missing word "Impact" for clarification.
- **Rule 9.401(3)** updates list of rules that apply to this rule.
- **Rule 9.501(1)** would require the removal of solid fuel burning devices in the Missoula Air Stagnation Zone when a property is sold, transferred or conveyed. Previous version of the rule required solid fuel burning device removal only when a property was sold. The new requirement for property would now apply to inherited property and other changes of ownership. This change makes Rule 9.501 consistent with the rest of Chapter 9.
- **Rule 9.501(2)** replaces the word "sold" with the phrase "sold, transferred or conveyed" for the list of devices that can remain when a property is sold, transferred or conveyed. The revised rule would also remove the grandfathering in of class I wood stoves that were installed between 1986 and 1994. Upon change of ownership in the Missoula Air Stagnation Zone, all wood stoves would need to be removed from a property when a property changes ownership.
- **Rule 9.501(3 - 8)** is deleted. Completion of the Certificate of Compliance Form would no longer be required when a property is sold, transferred or conveyed in the Missoula Air Stagnation Zone.
- **Rule 9.601** fixes a grammatical error.

Chapter 9 is the solid fuel burning device chapter. There are no comparable state or federal requirements for solid fuel burning devices.

MCA 75-2-301(4) justification for changes to Chapter 9 are written below.

Missoula County and western Montana has the potential to violate the national air quality standard for fine particulate matter (PM_{2.5}) in the winter when temperature inversions trap air pollution to the valley floors. PM_{2.5} is tiny particulate, only 2.5 microns in diameter. By comparison, a human hair is about 70 microns thick. Residential wood heating is the main source of winter particulate pollution in Missoula County.

PM_{2.5} can aggravate asthma, decrease lung function, and be a general irritant to the airways. Because it is small enough to pass from your lungs into your blood stream, it can also cause heart attacks and strokes. People with heart or lung disease, children and the elderly are at higher risk for adverse health effects from particulate in the air.

As the population in the Missoula County grows, measures to maintain or improve air quality to meet the national standards are critically important to protect public health. By requiring clean burning technology for new solid fuel burning device installations, we reduce air pollution emissions that harm public health.

The rule changes in Chapter 9 require that current technology for solid fuel burning devices be used for new installations. In the more sensitive parts of the county, such as the Seeley Lake Wood Stove Zone and the Missoula Air Stagnation Zone, only the cleanest burning solid fuel burning devices can be installed to protect the more at-risk air sheds. The devices are commercially available and listed on the United States Environmental Protection Agency website.

Peer reviewed scientific studies: See bibliography.

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