



13203 SE 172nd suite 166#220, Happy Valley, OR 97086, 503-515-8314

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March 26, 2024

Attn: Department of ecology

Variance request

Lynnette:

Greenside Construction Inc. would like to request a variance for an air quality permit to operate the Tigercat 6050 carbonator. The Carbonator is a type of air curtain incinerator (ACI) which also produces biochar. The Carbonator meets the requirements set by DOE with the exception of the 0.23 gram/dscm grain emission standard. The current measure value of an ACI is .28 gram/dscm is slightly higher than the standard.

As demonstrated by the air quality modeling, the emissions from the ACI would not endanger public health, safety, nor the environment. The modeling conducted as part of the permit application demonstrated that the ambient air quality impacts would be less than the national ambient air quality standards and less than the ambient significant impact levels for air toxics.

The air curtain is the technology used to reduce emission emitted during the combustion process of the logging slash. There is no known way to reduce emissions beyond that achieved with the air curtain that is known. As such, compliance with the grain standard would impose a serious hardship without benefit to the public.

It's worth mentioning that if this permit is not issued, the slash piles will be burned under the Department of Natural Resources silvicultural burning practices for forests. The purpose of this project is to demonstrate the environmental advantages of using an ACI rather than open pile burning. According to the Oregon DEQ, who oversaw the most recent emission testing of an air curtain incinerator, particulate matter is reduced by 83% when logging slash is burned in an ACI as compared with pile burning. Further, carbon monoxide is reduced by 91.9% and air toxics are reduced by 50-98%.

Because of the location of the project, miles away from the nearest residence, we feel this is a great location to perform this pilot project. The USFS is seeking new approaches to reduce emissions from land management activities, including testing of this technology. Greenside construction has been participating in this endeavor and will continue to improve and expand on the goal of reducing emissions and alternatives to open pile burning.

Sincerely,

Jeff Elder