

MATTHEW SILVA Chairman, NM Tree Farm Committee

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TREE FARM BULLETIN

AIR CURTAIN INCINERATOR USE AND ISSUES

By Joseph Stehling, Secretary

An air curtain incinerator cleanly eliminates slash. But we have since learned that its continued use requires an expensive annual opacity test, thus rendering it of limited value to a forested community.

The Hidden Lake Development consists of 100 lots in a heavily wooded and overgrown area 15 miles south of Angel Fire. In addition to the lots, the 1,500-acre development includes a 45-acre lake, a 24-acre drainage easement, and a wildlife corridor. Our predominant species are Engelmann spruce, quaking aspen, bristlecone pine along with a smattering of Douglas-fir, corkbark fir, and others. We have been working since 2006 at reducing wildfire risk by thinning and cleaning up the dense forest. To date we have thinned or partially thinned almost 400 acres. Much of the slash from previous thinning operations was eliminated by open burning. Although perfectly legal, and in full compliance



with state and local regulations, those operations produced vast amounts of smoke.

In 2016, the Hidden Lake
Property Owners Association
purchased a Model T22 Burn
Boss portable air curtain
incinerator (ACI). The unit was
purchased with Bureau of Land
Management funds through a
grant from the New Mexico
Association of Counties.
According to the manufacturer,
the Incinerator is EPA Tier IV
compliant, 40CFR60, and is FAR
less polluting than the standard
practice of open burning.

Since delivery in August 2016 we have used the unit 11 times to eliminate 300 cubic yards of slash. However, there are practical limitations. We must rely on property owners to stack the slash on their lots. 93% of owners are absentee. There are three lots with slash stockpiled at this time. We cannot operate when a burn ban is in effect. When burning is allowed, we only operate for a maximum of five hours each day. This practice allows the flames to die down. Afternoon winds can stir embers from the bed. We are not burning at this time. We must wait for the snow to melt, for visiting owners to pile their slash, and for allowable burning weather with no ban on burning.

There is another very restrictive situation. When we purchased the unit, we had not been briefed on the extensive air quality regulations that would have to be met. We coordinated with the New Mexico Air Quality Bureau to assure we have complied with all requirements. We submitted a Solid Waste permit because of the ash residue, a Title V Permit application, and conducted an initial opacity test that showed no visible emissions after initial startup. We did not realize the opacity test would be a recurring requirement that costs approximately \$1,200 annually. This continuing cost could not be maintained by the development and, as the test data shows, is not necessary when compared to open burning. To obtain a waiver to the annual opacity test requirement, we wrote letters to EPA, Region 6 and to the EPA National Office of Air and Radiation. In November 2017, we wrote to the Administrator of the EPA, Scott Pruitt, after having received no replies to our other two letters. We have submitted three e-mail follow-up requests and are awaiting a response.

On 07 September, the Hidden Lake Development hosted the entire six-person staff of the New Mexico Air Quality Bureau for a demonstration of the ACI. They had not observed the incinerator in operation previously and were very impressed with how it operated with next to no emissions. The staff indicated they are willing to do everything they can to help us overcome the expense of the opacity

test. Their contact with Region 6 indicated that the Trump administration does not allow changes or waiver of existing regulations. That is not our understanding and that was the main subject of the letter to Mr. Pruitt. Our understanding is that the EPA and other departments have been directed by the President to eliminate or change regulations that are unnecessary, onerous, expensive, or stifle operations.





We are exceptionally pleased with the operation of the ACI. The only fuel required is diesel for operation of the air blower and for igniting the fire in the bed. To date the unit has about 45 hours on it and the two-gallon fuel tank has not required refueling. The only recurring maintenance required is for changing the 12.5 HP Kubota engine oil and filter. Using the tractor mounted grapple greatly reduces the manual effort required to burn the slash. The unit easily handles tree stumps that can fit in the bed.



The photo (above) of the ACI shows the lack of smoke from the unit, but a large amount of smoke in the background from open burning on an adjacent lot. We are hopeful for a satisfactory resolution to the expense of the annual opacity test.



NM TREE FARM 2018 FIELD DAY APRIL 7, 2018 CAMPBELL RANCHY

2018 Tree Farm Field Day Agenda RSVP By April 2, 2017 Lunch will be provided

Limited Number of Spots Available

Please RSVP to Todd By Email: Todd.Haines@state.NM.us or 505

NM TREE FARM 2018 FIELD DAY APRIL 7, 2018 CAMPBELL RANCH

Presenters

Dr. Richard Melzer Professor of History UNM -Valencia Campus Author of a number of books including Coming of Age in the Great Depression - The CCC experience in New Mexico

Boy Scouts of America - Great Southwest Council TBD

Todd Haines - NM State Forestry District Forester

Tinkertown Museum Representative (TBD)

The Campbell Ranch is located 1 mile west of N hwy 14 (NM 337) on your right just across the street from Tinkertown Museum. Take I 40 to the Tijeras exit then proceed to the Sandia Crest Highway. Turn West and proceed 1 mile.





Welcome and Sign in

Introduction to the Campbell Ranch (BSA)

09:30

The Campbell Ranch is a new and developing 40 acre Boy Scout property located in the East Mountains of Albuquerque. It is a unique area with remnants of a historical Civilian Conservation Corps Camp.

BRIEF Overview of Forestry and Tree Farm Status 10:30 Since the acquisition of the property in 2003, the Boy Scout Council is working to develop an outdoor area, close to town for scouts to use to be in nature. The Council has been active in Forestry by developing a Forest Stewardship plan with the New Mexico Forestry Division in 2013 as well as part-nering in a Fire Response plan. Some work days have been performed on the camp. Forest thinning and chipping activities have allowed them to become a certified Tree Farm.

The Civilian Conservation Corps in New Mexico

10:45

You will notice that one of the most prominent features of the camp is the remains of buildings. These historic structures were once a CCC camp facility. Dr. Melzer wrote the book on the CCC in New Mexico and will provide insight on this endeavor from our past.

Lunch 13:00

Off site tour across the street to Tinkertown

13:30

Just across the street from the camp is the Tinkertown Museum that will be a rare treat for those who have not visited this before (and for those of us who have). The abundance of hand carved figures and other displays will certainly get fólks talking.





Register Now for the 2018 Wildland Urban Fire Summit

(Previously called the Wildland Urban Interface Summit)

The Lodge at Santa Fe

April 10-12, 2018

WUI Summit Registration Only - \$75.00 (Advance)/\$85.00 (Onsite)

The state's leading authorities in wildfire preparedness will be meeting in Santa Fe, April 10-12, to host the 2018 Wildland Urban Fire (WUF) Summit. The WUF Summit is one of New Mexico's largest events designed to discuss and prepare the state for wildfires, including the impending 2018 wildfire season. The theme for this year's WUI Summit is "Collaborative Community Action" and this topic will be highlighted throughout the two-day summit. Local government leaders, fire and emergency responders, businesses, and community members encouraged to attend.

For more information and online registration, please click here **2018** Wildland Urban Fire Summit.

Lodging is available at the Lodge at Santa Fe for a rate of \$85.00 Single/Double plus tax. Reservations must be made directly with the hotel no later than March 10th to guarantee the negotiated WUF Summit rate.



The Wildland Urban Fire Summit is a collaborative event hosted by the Bureau of Land Management, US Forest Service, Bureau of Indian Affairs, New Mexico State Forestry, New Mexico State Land Office, New Mexico Association of Counties, New Mexico Municipal League, Forest Stewards Guild, and Southwest Fire Science Consortium



1) BUY, SELL OR TRADE

Are you looking for forestry related equipment to buy (i.e. chipper, splitter, chainsaw, etc.)? Or, do you own forestry related equipment you would like to sell or trade? Forestry related equipment only, please, no homes or land. We would like to help you make the connection with other New Mexico Tree Farmers. Provide us with a description of the equipment, price, photo and contact information and we will post it in the New Mexico Tree Farm Bulletin. If you would like us to help you make the connection, please provide information to Arnie Friedt at arnie.friedt@state.nm.us

2) COMMUNITY CORNER

On April 7th at the Madonna Hall in Jemez Springs from 5-9 PM, a spaghetti dinner will be provided followed by the movie "Only the Brave". It will be accompanied with a discussion about wildfire risks to properties, residents, and fire fighters. This movie is about the Granite Mountain Hot Shot crew that tragically lost 19 of their crew members in a wildfire in 2013 near Prescott, Arizona. That crew fought the Thompson Ridge Fire in the Jemez Mountains a few weeks before their deaths.

On April 14th, the 8th annual Wildfire Preparedness Workshop will be held at the Jemez Mountain Baptist Church in La Cueva nine miles north of Jemez Springs. Presentations will be given by the USFS, State Forestry, County Fire and Sheriff Departments, Firewise and Animal Amigos to help prepare for this spring and summer due to our unusually dry winter. It will begin at 9 AM and lunch will be served. Eric Larson is the coordinator at imbc@zianet.com.

On April 21st, Earth Day, field trip tours will be offered to show property owners practical examples of thinning private properties with the help of technical and financial assistance. The sign-up for the tours will be at the Workshop on the 14th. Coordinators for this activity are Tom Swetnam at treering1748@gmail.com and Harry Jones at hjonesaz@gmail.com

If your community is having a forestry related public event let us know the details and we would be delighted to promote your event in the New Mexico Tree Farm Bulletin. Give us the event details, Who, What, Where and When with contact information and we will include in our monthly bulletin. If you would like us to help you promote your event, please provide information to Arnie Friedt at arnie.friedt@state.nm.us

3) E-MAIL INSTEAD OF SNAIL MAIL

Would you prefer to receive your Tree Farm Bulletin by e-mail instead of snail mail? If so, contact Doug Boykin at doug.boykin@state.nm.us and provide him with your contact information. By receiving your Tree Farm Bulletin by e-mail our operating costs are reduced. Thank you for considering this option.

4) COMMITTEE MEETING Out-of-towners! It is on a Friday!!!

All Tree Farmers are invited and encouraged to attend our 2nd New Mexico Tree Farm Committee Meeting of the year (three held annually). Please join us at 1:30 pm on Friday, August 10th, 2018 at the New Mexico Department of Game and Fish office located at 3841 Midway Place NE, Albuquerque, NM. Come out and hear what other tree farmers have been up to and share your tree farm accomplishments with the group. We look forward to visiting with you. If you have any questions, please contact Arnie Friedt at arnie.friedt@state.nm.us

