

Smoke Managers Sub-Committee Conference Call
Roster & Meeting Notes
Tuesday, 11.8.2011 @ 10:00 MT

Roll Call:

Yellow highlighted names = those who were on the conference call.

Andrea Boyer	Gerald Barrett	Rick Gillam
Ann Hobbs	Jennifer Godwin	Ron Sherron
Brandon Clifford	Jim Brenner	Russ Marchion
Brian Bohlmann	Jim Roehl	Stu Hoyt
Carol Blocksome	Julie Simpson	Susan O'Neill
Carol Golsh	Karen Brooks	Tim Hepola
Christine Paulson	Kim Sumner	Todd Breininger
Claudia Standish	Mike Broughton	Todd Richardson
Colleen Campbell	Nathan Lancaster	Twa-le-Abrahamson
Darryl Jones	Neal Edmondson	Ursula Parker
Deidre Dether	Nick Yonker	Vince Carver
Erin Law	Pat McLaughlin	Willie Begay
Gail Kantak	Randy McKenzie	
Gary Arcemont	Rick Connell	

Additional Agenda Items- None

**EPA- Rick Gillam/Air Quality Standards
Ozone**

- Sept. 2 President Obama withdrew proposed rule from current standard
- Memo from EPA came out September 22, 2011
<http://www.epa.gov/air/ozonepollution/pdfs/OzoneMemo9-22-11.pdf>
Designate area .075 ppm 2008
- Proceeding with 2008 time period (3 yr. average of data)
- 52 areas have been identified as not currently meeting this standard
- Designations will hopefully be done by spring of 2012 – this is an accelerated time frame
- EPA is continuing 5-year review of NAAQS - next scheduled review of ozone schedule for 2014. Propose revision in 2013
- Jim Brenner: 2008 was never fully implemented. Back in 2009, EPA suggested non-attainment but it never actually was designated. Is there a current national map? YES, it is on the website that identifies by metropolitan areas; county and design value.
- **ACTION ITEM:** Rick will send Jim a SE map.

PM 2.5

- Undergoing revision (still in progress).
- Latest action is a 10/14/11 letter from EPA administration to a couple of congressman.
[http://myfirecommunity.net/NeighborhoodPublic/Neighborhood279/Stabe nowpm10.pdf](http://myfirecommunity.net/NeighborhoodPublic/Neighborhood279/Stabe%20nowpm10.pdf) The letter indicated that there was not going to be any revision to the PM₁₀ coarse standard (mostly a farm dust issue at this point). PM₁₀ is a concern in west, PM_{2.5} in SE is a bigger concern
- EPA had a deadline of October 17, 2011 to propose the revised standards. The American Lung Association has given a Notice of Intent to Sue because of the missed deadline. <http://www.lungusa.org/get-involved/advocate/advocacy-documents/epa-60-day-intent-to-sue.pdf>
- Proposal for PM_{2.5} is still in the works, but it looks like April 2011 Policy Assessment (summarizes health impacts of PM_{2.5} and that contains the recommended values.) Up to EPA Administrator, Lisa Jackson, whether the value will be changed.

Air Quality Policy for Prescribed Fire, etc.

- In process of updating the 1998 Interim Policy.
- The update has been in progress for the last few years.
- Federal land managers (FLMs) have seen some internal drafts for review
- EPA is working with the parties and plan to get a document out for public review (although it will be at least 2012 before anything is released).
- **CONCERN** by some state AQ representatives: Had same issue with the Clean Air Act. In the process of developing policy, the states are closed out until all the federal players have completed their review. Since it's the states that have to implement it, why aren't they involved in the early review?

NACCA & WESTAR are involved in getting feedback

Bill Harnett coordinating effort at EPA headquarters with NACCA & WESTAR

ACTION ITEM: Rick will take this concern back to his EPA workgroup

- Policy is to be shared with public and states for review and comments "soon."
- Mike: Belief by a number of people that the possible inclusion of agriculture (ag) in this policy will cause an endless review. Ag burns are considered by EPA as a subset of Rx burns, but are defined and handled differently by each state.
- Gary Arcemont on Exceptional Events: It's incredibly difficult to prove that some flagged AQ exceedences are the result of Rx, wildfire, etc. and how they are affecting the AQ monitors. Getting to be more & more of a problem. Having to get this approved by EPA is a tremendous task.
- This is one big reason the policy is being revised - to address exceptional events.

- EPA knows that exceptional events are difficult to prove
- Rick is on EPA's exceptional events work group
 - HOT topic and need to clarify guidance and how to treat fire & exceptional events demonstration.
 - The effort is being coordinated with the air quality policy revision and there are many overlapping issues and multiple groups looking at it.
 - If you have issues you want EPA to consider, funnel those to Rick for inclusion in his workgroup discussions...
 - Todd Richardson: 'Wildland Fire Use' definition still sits in NWCG but there is still a great deal of confusion about the definition.

Nitrogen dioxide Designations for new standard were due to be issued on 10.31.2011.
<http://www.epa.gov/airquality/nitrogenoxides/designations/>
 Could possibly be coming out today or later this week? Probably won't be any areas designated as non-attainment because data is inconclusive. Fires are a big source of nitrogen dioxide.

SMOKE CHALLENGE/SMOKE SOLUTION

CHALLENGE

- During 2008 wildfire outbreak a number of counties in California had ozone exceedences and flagged those data. They were finally given "exceptional event" status but the process was **very** labor intensive.
- Rick: A number of those that were granted are included on EPA's exceptional events page in hopes that states can build on what has already been done. <http://www.epa.gov/ttn/analysis/exeevents.htm>
- Gary, San Luis Obispo: EPA received a lot of documentation. There was so much that some have still not been acted upon.
- Since we are now using 2009-2011 for regulatory action... 2008 exceptional events will no longer be an issue. Time frame for regulatory actions should be consistent with the dates of the exceedences. Same situation coming up for particulate matter. The workload is so intensive that EPA cannot even act upon a number of the exceptional events.
- Q - When fire season is during ozone season, how do you parse out which molecules created the problem? A - There's the rub - proving that if there had not been an event, the standards would not have been exceeded.
- Recommendations from WESTAR are taken very seriously by EPA regarding what to do about fires, ozone, etc.
- Anthony Matthews sent forward his thoughts - Mike read these out loud
- The National Weather Service is including HYPSLIT runs in spot fire weather forecasts - very helpful...
- Few tools used in exceptional events for fire: Resource intensive to get data: Some tools EPA has include remote sensing GATEWAY-satellite data, EPA Air NOW data and air monitoring data in map form; WFDSS

SOLUTION

- Working towards streamlining the process and getting a better sense of what EPA wants
- Be prepared up front by documenting your decisions in advance. Take into account what is going to happen with your smoke as conditions change on the fire.
- FLM's and Air Quality regulators must work together closely (The goal is not to get an exceedance at all, especially for anything that is being managed!)
- It is a process and it will take some time
- Communication protocol - brought all types together to get the correct wording
- Getting issue out there amongst all levels is critical

Action Item: Next conference call - Mike will send out another Doodle poll with dates & time. Possibly 1.24.2012 or 1.31.2012

Regional smoke manager's subgroups

- Are we ready for it?
- Nick's suggestion: Take existing list from the current group, & divide up folks by area/region [boundaries? May need to go by states], could contact one another directly; just need the contact information.
- Then we can add other contacts as we go along.
- Defining membership

Website updates

MyFireCommunity – [Air Quality and Fire Issues](#) - lots of valuable information and working to organize it

NWCG smoke site in process of being re-done

NIFC smoke site will be melded into NWCG site

You will see some changes in the coming months...

Round Robin

Deidre:

Recommend next smoke challenge/smoke solution topic be Smoke Coordination & Communication Plans

Action Item: Mike: Collect a few examples of Communication and Coordination plans and post on MyFireCommunity site.

Lea Paulson in Wyoming - Exceptional events general information on web

What is a good resource for this?

EPA has natural events policy that has a good discussion in preamble.

Natural Events Policy is a predecessor to the exceptional events rule.

Wyoming policy is just high winds for EE

ACTION ITEM	BY WHOM?	BY WHEN?
Get out primary links to websites & documents	Claudia & Mike	December 9
Take existing distribution list and divide by areas & send out to group	Claudia & Mike	December 9
Attach Communication & Coordination Plans in notes and get them on MyFireCommunity website	Mike	December 16

DRAFT