



Update on Smoke and Air Quality Issues

Kara Paintner – Feb 2006

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Natural and Exceptional Event
Rulemaking

Revisions of NAAQS – National Ambient
Air Quality Standards – Particulate
Matter (PM)

State Implementation Plans for Regional
Haze

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Natural and Exceptional Event Policy

- How wildfire is exempted from NAAQS
- Congressional mandate to become a rule (law) in 2005
- March 2006 proposed, finalized within one year



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USDA – DOI proposal

- Exceptional Event Status for ‘significant’ wildfire use and prescribed fire
- Daily tracking of fires - 100 acres timber, or 300 ac shrub or grass per day
- Fire manager with smoke training
- Coordination with local or state air quality regulator



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EPA Draft Response

Naturally occurring fires and wildfires other than those resulting from poor management of prescribed fires would be considered “exceptional” and excluded.



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EPA draft response, continued

Prescribed fires for hazard reduction and resource management objectives would be excluded if they are:

- infrequent
- no reasonable alternatives to burning exist
- burns are well-managed in accordance with approved smoke management plans

Not qualifying as exceptional events:

- frequent burns (more than one in 3 years at one location)
- burns for which reasonable alternatives exist
- wildfires resulting from poorly-managed fires not complying with approved smoke management plans

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Unit Implications

- Possible need for additional training for FUM and RXBX
- May need additional daily tracking
- Update March/April 2006 w/ proposed rule
- May need help with state and local air and forestry staff during comment period





Proposed Revisions to PM_{2.5} & new PM 2.5-10 standard

- 70% of smoke is less than 2.5 microns
- 20% are between 2.5 microns and 10 microns
- No standard for PM 2.5-10
- Currently 15 ug/m³ annual and 65 ug/m³ 24 hour average PM 2.5

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Proposed change in 24 hour PM 2.5 standard
from 65 to 35 $\mu\text{g}/\text{m}^3$

Retain annual PM 2.5 standard at 15 $\mu\text{g}/\text{m}^3$

Public comment on
alternative levels of
24 standard in from
25 – 65 $\mu\text{g}/\text{m}^3$ and
a lower annual
standard of
12 - 14 $\mu\text{g}/\text{m}^3$

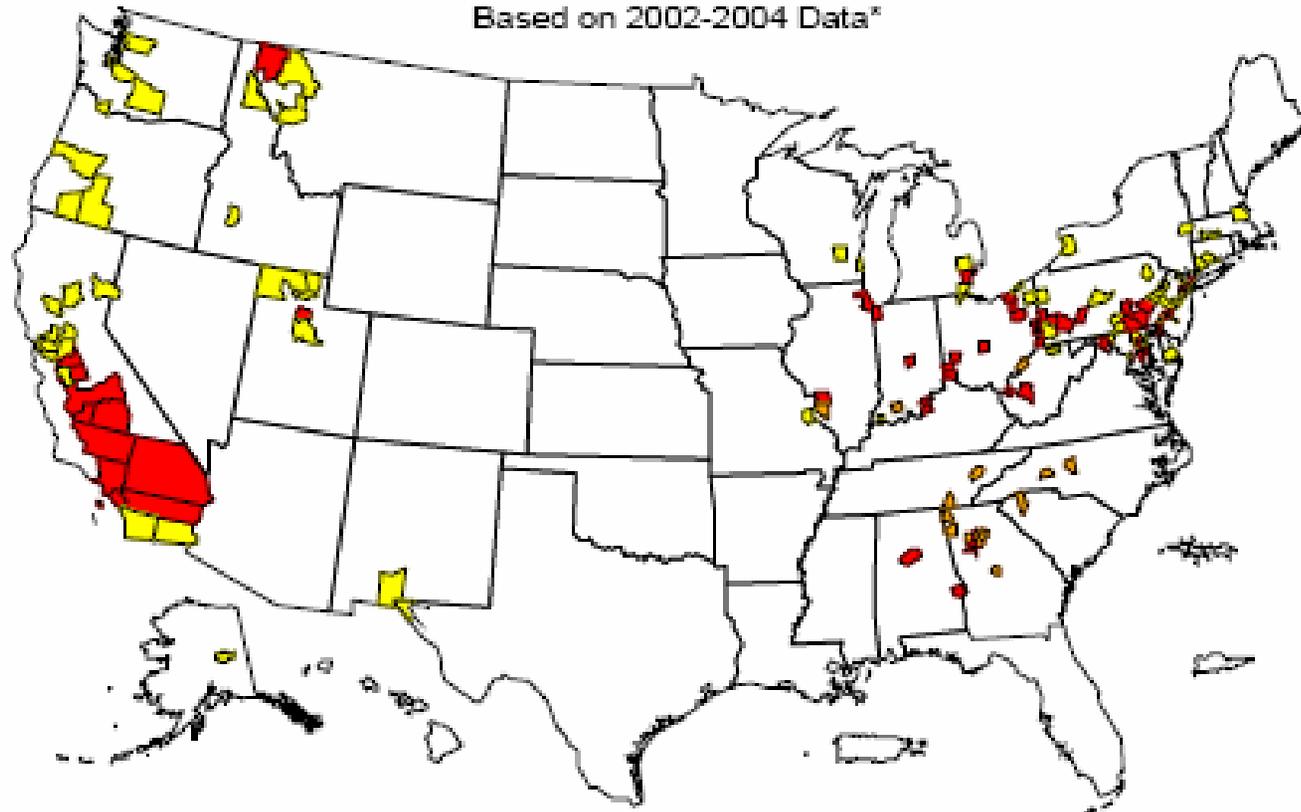


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Counties Exceeding 15 $\mu\text{g}/\text{m}^3$ Annual and/or 35 $\mu\text{g}/\text{m}^3$ 24-hour $\text{PM}_{2.5}$ Standard Based on 2002-2004 Data*



- Annual and 24-hour $\text{PM}_{2.5}$ Nonattainment (53 counties)
- 24-hour Only $\text{PM}_{2.5}$ Nonattainment (69)
- Annual $\text{PM}_{2.5}$ Only Nonattainment (15)

(2002-2004; includes all sites w/ 11+ observations per quarter or those deemed complete via 'data substitution') (137 counties)

*These projections are based on the most recent data (2002-2004). EPA will not designate areas as nonattainment on these data, but likely on 2006-2008 data which we expect to show improved air quality. Exceptional events (e.g., fires) that may contribute to violations of the proposed standards may be included in this dataset.

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Timeline for Implementation of proposed PM_{2.5} if EPA finalizes September 2006:

- States by November 2007 designate areas to be attainment and nonattainment
- EPA final designations by November 2009; effective in April 2010
- State Implementation Plans, outlining how to meet standards, due 3 years after designations, April 2013
- States meet standards by April 2015
- In some cases, a state could receive additional time to meet the standard (up to April 2020)

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Unit Implications

More Nonattainment areas

- These areas are more difficult to do prescribed fire and WFU in

Greater potential to exceed standard with smaller fires



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State Implementation Plans (SIPs) for regional haze need to be complete

December 2007

in all states except;
AZ, NM, WY,
OR, WA

Smoke
Management
Plans may be
included



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Followup

- Updates to regional fuels staff
- Work with air regulators on State Implementation Plans – especially for Regional Haze due December 2007 – see 4cleanair.org for a list



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Followup

Take your state and local regulator to
lunch

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