

WESTAR/WRAP





Fire and Smoke Workgroup

June 13, 2022

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Air Quality Planner



DEPARTMENT OF
ECOLOGY
State of Washington



Ecology is seeking comments on whether the Department of Natural Resources' (DNR) 2022 Smoke Management Plan should replace the 1998 version in Washington's air quality plan.

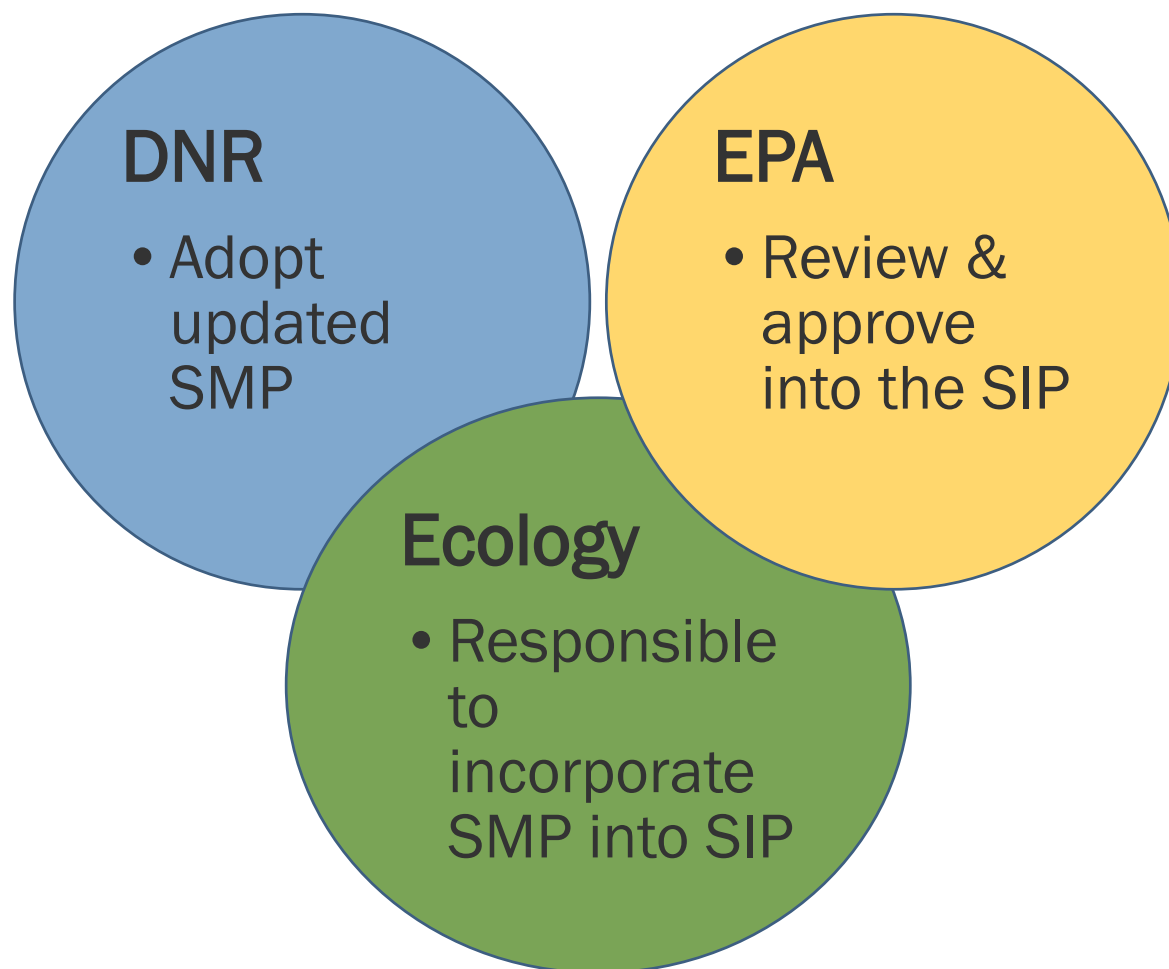
Public comment period and hearing

Agencies Involved

Agencies
have
distinct
roles

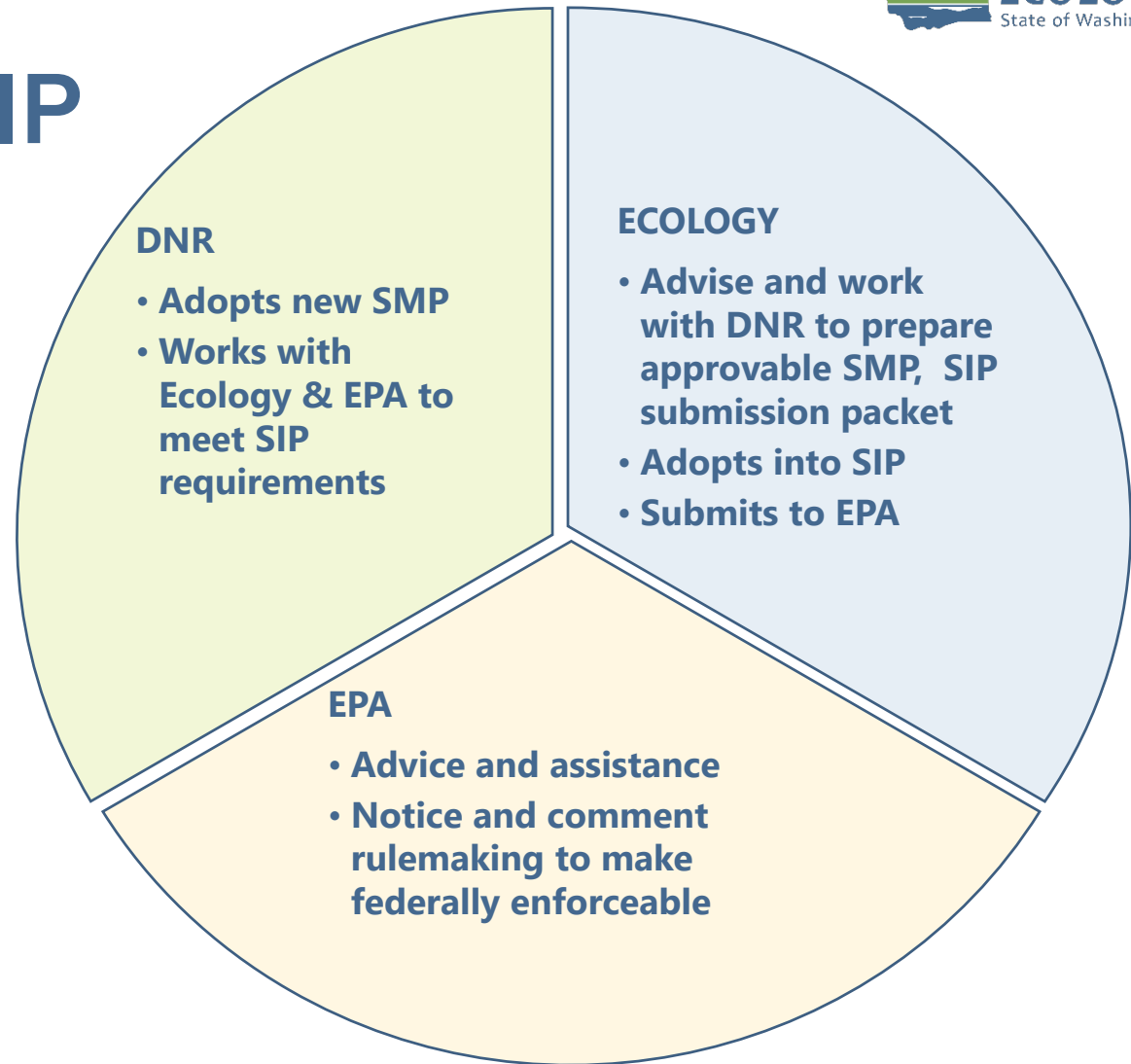
and

worked
together



SMP into SIP

- 1998 SMP currently in SIP
- 2022 Update
- Analysis of key changes



Ecology website:

<https://ecology.wa.gov/Regulations-Permits/Plans-policies/State-implementation-plans/Infrastructure-SIPs>



The screenshot shows the Ecology website interface. At the top left is the Department of Ecology logo. To the right are navigation links: Regulations & Permits, Research & Data, Blog, and Contact Us. Below these is a search bar. A secondary navigation bar contains: Home, Air & Climate, Water & Shorelines, Waste & Toxics, and Spills & Cleanup. The main content area is titled "Infrastructure, rule, & program plans". On the left is a sidebar menu under "Plans & Policies" with options: State implementation plans, Attainment SIPs, Infrastructure, rule, & program plans (highlighted), Maintenance SIPs, and Transportation conformity. The main content features a green button for "Período de comentarios públicos (Español/Spanish)" with a plus sign. Below this is a paragraph explaining that plans and rules are submitted to the EPA and become part of the State Implementation Plan (SIP). At the bottom is a box titled "I want to..." containing three links: "Learn about the regional haze state implementation plan", "Find out about Washington's air quality targets", and "Sign up for email updates about current projects".

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Regulations & Permits Research & Data Blog Contact Us

Home Air & Climate Water & Shorelines Waste & Toxics Spills & Cleanup

Infrastructure, rule, & program plans

 **Período de comentarios públicos (Español/Spanish)** +

We submit plans as well as state and local rules to EPA that show Washington has tools in place to meet national air quality standards. Once approved by EPA, these plans for infrastructure, rules, and programs become part of Washington's State Implementation Plan (SIP) for air quality. Plans and rules in Washington's State Implementation Plan are enforceable by EPA and the public.

I want to...

- Learn about the regional haze state implementation plan
- Find out about Washington's air quality targets
- Sign up for email updates about current projects

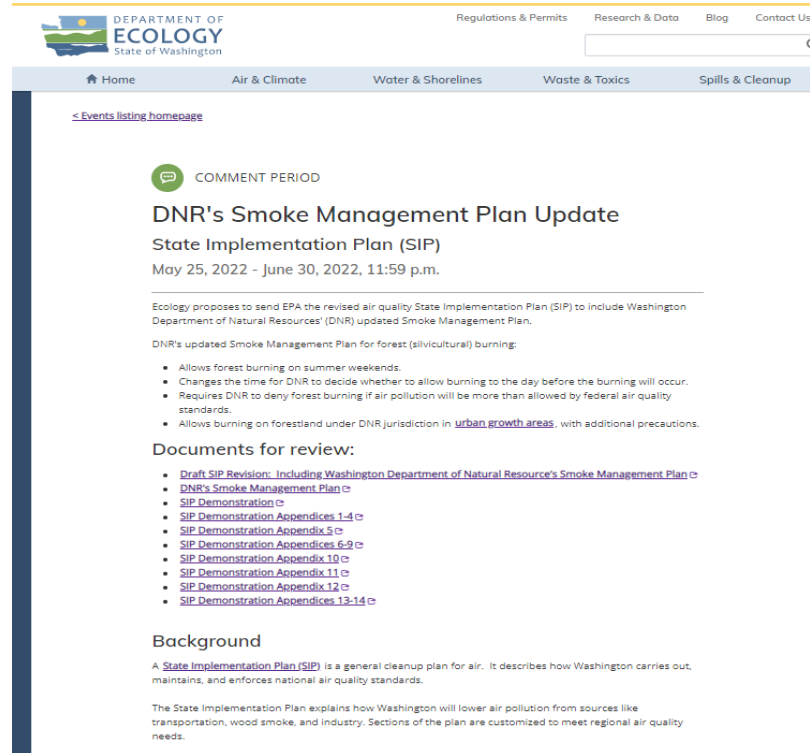
Public comment

We propose revisions to Washington's State Implementation Plan for air quality. These revisions show Washington's ability to attain, maintain, enforce, and implement federal air quality standards through infrastructure requirements and updated rules.

SIP document	Comment or request a public hearing
<p>Ecology proposes to send EPA the revised air quality State Implementation Plan (SIP) to include Washington Department of Natural Resources' (DNR's) updated Smoke Management Plan. DNR's updated Smoke Management Plan for forest (silvicultural) burning:</p> <ul style="list-style-type: none"> • Allows forest burning on summer weekends. • Changes the time for DNR to decide whether to allow burning to the day before the burning will occur. • Requires DNR to deny forest burning if air pollution will be more than allowed by federal air quality standards. • Allows burning on forestland under DNR jurisdiction in urban growth areas, with additional precautions. <p>Documents for review:</p> <ul style="list-style-type: none"> • Draft SIP Revision: Including Washington Department of Natural Resource's Smoke Management Plan • DNR's Smoke Management Plan • SIP Demonstration • SIP Demonstration Appendices 1-4 • SIP Demonstration Appendix 5 • SIP Demonstration Appendices 6-9 • SIP Demonstration Appendix 10 • SIP Demonstration Appendix 11 • SIP Demonstration Appendix 12 • SIP Demonstration Appendices 13-14 	<p>Public comment period: May 25, 2022 – June 30, 2022</p> <p>Public hearing: June 28, 2022, 6:30 p.m. online</p> <p>Register to get your meeting ID and passcode.</p> <p>Comment online</p> <p>Mail comments to: Laurie Hulse-Moyer, Air Quality Program Washington State Department of Ecology P.O. Box 47600; Olympia, WA 98504-7600</p>

Public comment period opened 5/25

- <https://ecology.wa.gov/Events/AQ/State-implementation-plans/DNR-Smoke-Management-SIP-Revision-comment-ends-6>




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 COMMENT PERIOD

DNR's Smoke Management Plan Update State Implementation Plan (SIP)











May 25, 2022 - June 30, 2022, 11:59 p.m.

Ecology proposes to send EPA the revised air quality State Implementation Plan (SIP) to include Washington Department of Natural Resources' (DNR) updated Smoke Management Plan.

DNR's updated Smoke Management Plan for forest (silvicultural) burning:

- Allows forest burning on summer weekends.
- Changes the time for DNR to decide whether to allow burning to the day before the burning will occur.
- Requires DNR to deny forest burning if air pollution will be more than allowed by federal air quality standards.
- Allows burning on forestland under DNR jurisdiction in [urban growth areas](#), with additional precautions.

Documents for review:

- [Draft SIP Revision: Including Washington Department of Natural Resource's Smoke Management Plan](#) 
- [DNR's Smoke Management Plan](#) 
- [SIP Demonstration](#) 
- [SIP Demonstration Appendices 1-4](#) 
- [SIP Demonstration Appendix 5](#) 
- [SIP Demonstration Appendices 6-9](#) 
- [SIP Demonstration Appendix 10](#) 
- [SIP Demonstration Appendix 11](#) 
- [SIP Demonstration Appendix 12](#) 
- [SIP Demonstration Appendices 13-14](#) 

Background

A [State Implementation Plan \(SIP\)](#) is a general cleanup plan for air. It describes how Washington carries out, maintains, and enforces national air quality standards.

The State Implementation Plan explains how Washington will lower air pollution from sources like transportation, wood smoke, and industry. Sections of the plan are customized to meet regional air quality needs.

DNR Smoke Management Plan

- 2016 Legislature directed DNR to revise SMP to provide for increased pace and scale of silvicultural burning to manage lands to reduce wildfire risk
- Started working on with Ecology in 2017 – with several long pauses
- Involved EPA Region 10 to assure draft SMP could be approvable.

DNR Public Involvement

- DNR conducted various types of outreach at different times for the 2022 SMP during its development.
- DNR convened a task force in 2017 and 2018 and held several community meetings during development of the SMP.
- DNR completed review of the proposed UGA outdoor burning rule, including a SEPA public comment period from November 7, 2019, through November 21, 2019.
- DNR issued a Notice of Final Determination and response to comments on November 22, 2019.
- DNR held a webinar and accepted comments on the SMP in February 2021.

Demonstration

DNR provided an analysis that demonstrates the following changes will not interfere with the state's air quality goals:

1. Aligning assessment threshold in Large Burn Approval Criterion #1 with state law.
2. Removing the prohibition against summer weekend burning.
3. Notifying burners of permission to ignite their units by 4:30 PM the day prior to ignition.
4. Allowing burning on forestlands under DNR jurisdiction in Urban Growth Areas (UGA), with additional precautions.

Collaborative Project

- EPA reviewed drafts found a number of issues to be resolved before plan could be approved
 - Law changes required to provide enforcement authority
 - Demonstration must show compliance into the future, i.e., be forward looking
 - Small burns – need to show how NAAQS/RH Goals are protected
 - Changes in law to burn in UGAs- forestland burning only, needed lawyers to collaborate – needed to show how NAAQS/RH goals will be protected

- Not required, but recommended
 - Changes to be able to use SMP to support EE demos
 - include **criteria for issuing a health advisory**
 - found **no clear requirement to utilize and follow a burn plan**

EER Table 3: Summary of BSMPs, benefits, when applied – Communication-Public Notification

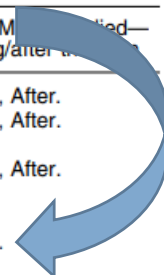
Federal Register / Vol. 81, No. 191 / Monday, October 3, 2016 / Rules and Regulations **68253**

TABLE 3—SUMMARY OF BASIC SMOKE MANAGEMENT PRACTICES, BENEFIT ACHIEVED WITH THE BSMP, AND WHEN IT IS APPLIED ^a

Basic smoke management practice ^b	Benefit achieved with the BSMP	When the BSMP is applied—before/during/after
Evaluate Smoke Dispersion Conditions	Minimize smoke impacts	Before, During, After.
Monitor Effects on Air Quality	Be aware of where the smoke is going and degree it impacts air quality.	Before, During, After.
Record-Keeping/Maintain a Burn/Smoke Journal.	Retain information about the weather, burn and smoke. If air quality problems occur, documentation helps analyze and address air regulatory issues.	Before, During, After.
Communication—Public Notification	Notify neighbors and those potentially impacted by smoke, especially sensitive receptors.	Before, During.
Consider Emission Reduction Techniques	Reducing emissions through mechanisms such as reducing fuel loading can reduce downwind impacts.	Before, During, After.
Share the Airshed—Coordination of Area Burning.	Coordinate multiple burns in the area to manage exposure of the public to smoke.	Before, During, After.

^a The EPA believes that elements of these BSMP could also be practical and beneficial to apply to wildfires for areas likely to experience recurring wildfires.

^b The listing of BSMP in this table is not intended to be all-inclusive. Not all BSMP are appropriate for all burns. Goals for applicability should retain flexibility to allow for onsite variation and site-specific conditions that can be variable on the day of the burn. Burn managers can consider other appropriate BSMP as they become available due to technological advancement or programmatic refinement.



Thank you

- Comment period May 25-June 30
- Webinar/hearing June 28
- Comment period ends June 30

- Target submittal date: August 10

- Laurie Hulse-Moyer – last day August 15