



January 29, 2016

U.S. Environmental Protection Agency
EPA Docket Center (EPA/DC)
1200 Pennsylvania Avenue N.W.
Washington, D.C. 20760
Attn.: Docket ID Nos: EPA-HQ-OAR-2013-0572 and EPA-HQ-OAR-2015-0229

Dear Sir or Madam:

The Western States Air Resources (WESTAR) Council, an organization of 15 western state air quality management agencies, appreciates the opportunity to comment on U.S. EPA's proposed revisions to the *Exceptional Events Rule* and the *Draft Guidance on the Preparation of Exceptional Events Demonstrations for Wildfire Events that May Influence Ozone Concentrations*. The WESTAR Council strongly supports EPA's efforts to improve the effectiveness and efficiency of the exceptional events regulation and associated guidance, and values EPA's willingness to consult with states on this important matter.

Simply put, the purpose of the Exceptional Events Rule is to ensure that a state is never required to develop a State Implementation Plan to address uncontrollable sources of air pollution. This is not to say that unhealthy air quality caused by exceptional events should be ignored. When air quality standards are violated, the air is unhealthy regardless of the source, and appropriate actions should be taken to mitigate public health impacts. The issue is not whether action should be taken - it should. The issue is whether the development of a State Implementation Plan is the best way to address uncontrollable sources of air pollution – and clearly it is not.

WESTAR supports EPA's proposed rule revisions that address many of our longstanding concerns. We welcome EPA's proposal to revise the Exceptional Events Rule rather than issuing more guidance. Several important rule changes that we have advocated for are proposed, including; removal of the existing obligation to show that the exceptional event is associated with air quality concentrations in excess of historical fluctuation and the removal of the existing obligation to show that, but for the event, there would not have been an air quality violation.

We also support EPA's efforts to streamline the exceptional events process when the circumstances surrounding the event are clear, as EPA proposes in the draft wildfire guidance. Streamlining addresses our longstanding concern about the extraordinary commitment of resources needed by both states and EPA to prepare and approve exceptional event requests.

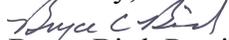
Attachments 1 and 2 include a number of additional comments and recommendations WESTAR believes would further improve implementation of the rule as well as the draft guidance. Of particular concern are two key rule issues highlighted below and discussed in greater detail in Attachment 1.

The first issue is related to the “not reasonably controllable or preventable” section of the proposal. As a condition for approval of an exceptional event request, states are required to demonstrate, to EPA’s satisfaction, that any control measures that could “reasonably” have been in place at the time of the event, must have been in place, including escalating control measures in areas subject to recurring dust and wildfire events. WESTAR supports EPA’s proposal to consider relevant control measures included in recent non-attainment or maintenance SIPs as sufficient to meet this criterion. We believe that this same concept should apply in attainment areas as well. In an area that is currently in compliance with air quality standards except on days impacted by uncontrollable events, EPA’s proposal would require a state to implement some undefined set of emission control measures in anticipation of future uncontrollable events in order to be eligible to exclude the event-impacted data. While we agree that the implementation of measures that would materially provide public health protections against unhealthy levels of air pollution make sense, such as those measures outlined in Section VI of the preamble, states should not be required to guess what additional measures EPA would find acceptable to qualify as “reasonable” under the exceptional events rule. Instead, we reiterate our previous comment that if EPA believes a state’s SIP is deficient, it is EPA’s responsibility to clearly identify the deficiency and the measures they believe are necessary to provide for attainment and maintenance of the relevant air quality standard.

The second issue is related to the wildland fires section of the proposal. EPA is proposing a number of substantive changes to the exceptional events rule to address air quality impacts from fires. In particular, EPA is proposing rule language describing the circumstances under which air quality data affected by emissions from wildfires can be excluded from regulatory determinations. While we agree with the concept – that data affected by wildfires should be excluded from regulatory determinations – we have concerns about EPA’s proposal to defer to the entity conducting some prescribed fires to declare that the fire is a wildfire, thereby making the resulting air quality impacts eligible for treatment as an exceptional event. We also do not believe that EPA’s proposal to authorize Federal Land Managers to recommend excluding air quality data under the revised rule is appropriate. That responsibility should remain solely with state and local air quality regulators.

We look forward to working with EPA on implementation of this important issue. If you have any questions, please contact Jeff Gabler at (503) 478-4955.

Sincerely,



Bryce Bird, President

Western States Air Resources Council

Attachments

Attachment 1

WESTAR comments on the Proposed Revisions to the *Exceptional Events Rule*

Not Reasonably Preventable and Controllable

As a condition for approval of an exceptional event request, states are required to demonstrate, to EPA's satisfaction, that any control measures that could "reasonably" have been in place at the time of the event must have been in place, including escalating control measures in areas subject to recurring dust events and wildfire events. WESTAR supports EPA's proposal to consider relevant control measures included in non-attainment and maintenance SIPs approved within five years of the event sufficient to meet this criterion and appreciate EPA's recognition of the role SIP's play in establishing reasonable control measures. Additionally, to clarify the proposed rule language at 50.14(b)(7)(iv): ". . . approved by the EPA within 5 years of the date of a demonstration submittal . . .," we urge EPA revise the language to say ". . . approved by the EPA within 5 years of the date of an event at issue . . ." The revision aligns with the language in the preamble at 72861, center column, first full paragraph. It makes sense that the approval date of the SIP should fall within five years of the event and not a demonstration submittal, which may be submitted an unspecified number of years after the event.

We further believe that this same concept, i.e., accepting an approved SIP as evidence of reasonable controls, should apply in attainment and unclassifiable areas as well. In an area that is currently in compliance with air quality standards except on days impacted by uncontrollable events, EPA's proposal would require a state to implement some undefined set of emission control measures in anticipation of future uncontrollable events in order to be eligible to exclude the event-impacted data. While we agree that the implementation of measures that would materially provide public health protections against unhealthy levels of air pollution make sense, such as those measures outlined in Section VI of the preamble, states should not be required to guess what additional measures EPA would find acceptable to qualify as "reasonable" under the exceptional events rule. We therefore reiterate our previous comments that if EPA believes that any state SIP is deficient, it is EPA's responsibility to clearly identify the deficiency and the measures they believe are necessary to provide for attainment and maintenance of the relevant air quality standard. Finally, while we agree that in areas with recurring events, a periodic review of controls is appropriate, an increasing level of control may not necessarily be either feasible or effective.

Submittal of Exceptional Event Requests by Federal Land Managers

WESTAR has concerns about EPA allowing federal agencies (land managers) to flag data and submit demonstrations independent of the state. While we welcome collaboration from federal agencies in preparing demonstrations for exceptional events where regulatory-grade federal monitors have measured exceedances or the event originated on federal land, we do not believe it is appropriate to grant authority for these decisions to an agency other than an air quality agency, because other agencies have different functions and priorities. Although the proposal provides that the federal agency should proceed with developing the demonstration only after "discussing" the event with states, granting land managers the authority to submit

demonstrations is inappropriate. Instead, while the decision to develop and the development of a demonstration may be a joint one, between the air agency, land manager and EPA, the responsibility for air quality in a state, including exceptional event requests, rests with the state agency. Therefore, WESTAR does not support the section of the proposal that grants flagging and demonstration submittal authority to federal land managers.

Smoke Management Plans

WESTAR understands that prescribed burning is a tool, that used judiciously, can minimize wildfires, and that fire managers are the experts in their field. However, WESTAR is concerned about fire managers being the decision maker and having authority to declare when the fire event becomes an exceptional event (i.e., a prescribed fire becomes a wildfire eligible to be treated as an exceptional event). If the decision rests with the entity that started the fire and EPA relies on only their statement that BSMP were used or that the SMP was followed, this provides no role for the air agency, or incentive for the fire manager to minimize air impacts. While consideration of air quality is included in fire managers protocols, these other agencies have different functions and priorities. A fire manager's objectives, as spelled out in great detail in EPA's preamble, deal with resource management, not public health protection from unhealthy levels of air pollution.

WESTAR has further concerns about the BSMP option. This option puts the air agency in a reactive mode (i.e., agencies would have to show what the fire manager didn't do what should have been done) rather than the more appropriate role under an SMP approach of determining in advance what actions are appropriate and then, if data is to be excluded under the EE rule, the air agency need only determine if the actions incorporated in the SMP were implemented.

Mitigation

WESTAR supports the requirements of 40 CFR 51.930 to take appropriate and reasonable actions to protect public health by providing prompt public notification, public education concerning actions individuals may take to reduce exposure, and implementation of appropriate measures to protect public health. In the preamble to the 2007 Exceptional Events Rule, EPA stated that states should take reasonable and appropriate measures to protect public health, and that states should determine what measures constitute those that are reasonable and appropriate. Based on experience to date in implementing the Exceptional Events Rule, WESTAR believes this approach continues to be the most effective method for addressing public notification and mitigation requirements. We note that many states have existing documents or mechanisms in place that address these requirements such as Natural Event Action Plans, and the emergency episode requirements contained in infrastructure SIPs. WESTAR therefore continues to support EPA's current approach that provides flexibility and deference to states in determining the most appropriate mitigation and public notification efforts and mechanisms.

Scope and Applicability

EPA is proposing to limit exceptional event requests to a specific set of regulatory actions (i.e., initial area designations, classifications, attainment determinations, determinations regarding requests for attainment date extensions, and findings of SIP inadequacy leading to a SIP call). However, there may be other compelling reasons why states would want EPA action on an exceptional event demonstration, including exceedances that may contribute to a violating design value in a future year; exceedances that may impact modeling or statistical analyses; exceptional event demonstrations that use historical data comparisons; and to address public perception of air quality in a region. WESTAR urges EPA to not limit demonstrations to just the five types of regulatory actions in the proposed rule, but to also include an option for the region and state to decide on a case-by-case basis that data from an event outside the listed regulatory actions may be considered for exclusion as an exceptional event.

We appreciate that EPA is proposing to issue an alternative to the rule itself for excluding exceptional events (*Draft Guidance for Excluding Some Ambient Pollutant Concentration Data from Certain Calculation and Analysis for Purposes Other than Retrospective Determination of Attainment of the NAAQS*), suggesting that this will address exceptional events that do not fall into the list of five proposed in the Rule. However, because this guidance will not be available before the Exceptional Event Rule revisions are final, states cannot rely on it to address the above concerns. While the forthcoming guidance may provide other options, without knowing what will be in this document, and for states that must rely on requirements within a rule, the Rule should contain the option to consider other events for exclusion on a case-by-case basis.

Finally, EPA is proposing to further restrict the applicability of the Exceptional Events Rule by stating that it does not expect to act on demonstrations in an unclassifiable or attainment area, unless the area could become nonattainment. Again, WESTAR maintains that EPA should allow demonstrations in an unclassifiable or attainment area based on compelling reasons.

Timing

WESTAR believes that EPA should make a timely determination on all submittals that meet the criteria in the proposed Exceptional Events Rule, or that the state and EPA have decided on a case-by-case basis to consider. This was EPA's intent when it drafted the, *Interim Guidance on the Preparation of Demonstrations in Support of Requests to Exclude Ambient Air Quality Data Affected by High Winds Under the Exceptional Events Rule* in May, 2013. On page 33 of that document, EPA proposed to conduct a complete an initial review and send a letter to the state, "outlining preliminary assessment of completeness of package/need for additional Information" within 120 days of receipt of the demonstration. EPA further proposed that states would then have 60 days to respond. WESTAR requests that EPA include, within the proposed Exceptional Events Rule, a similar timeframe under which EPA must respond to state submittals with a completeness letter and note any additional information that is needed. WESTAR also proposes that EPA include, within this proposed rule, a 12 month deadline from the date the submittal was received in which EPA must concur on a submittal or explain why they cannot.

EPA is also proposing to terminate review of its backlog of exceptional event demonstrations due to passage of time. WESTAR believes it is essential that states be allowed to review the backlog and work with their EPA Regional Office to retain packages that they believe have “compelling” reasons for action under the Exceptional Events Rule.

Dispute Resolution Process

As noted in our previous comments, WESTAR continues to believe that the Exceptional Events Rule should contain an administrative dispute resolution process to resolve disagreements over concurrence or approvals before a significant regulatory action is taken. We agree that establishing early and regular communication with EPA regional office staff is a positive step. As part of this communication process, we support EPA’s proposal regarding requirements for initial notification of exceptional event requests states expect to pursue. This initial notification will help establish a dialog between EPA and states regarding expectations for subsequent documentation that will support development of approvable demonstrations.

However, situations may still occur where states will disagree with an EPA Regional Office action to disapprove a demonstration package. We therefore reiterate our recommendation for EPA to develop an administrative dispute resolution process. This process should ensure that states have the ability to present their concerns to EPA Headquarters staff directly, or could alternatively involve a third party with technical expertise to provide for an independent review of the documentation prepared by a state and the EPA Regional Office assessment. Given the importance of this issue, WESTAR offers our assistance in working with EPA staff to develop an effective dispute resolution process.

Attachment 2

WESTAR comments on the *Draft Guidance on the Preparation of Exceptional Events Demonstrations for Wildfire Events that May Influence Ozone Concentrations*

Introduction

In conjunction with the Exceptional Events proposed rulemaking, EPA concurrently released and is seeking comment on the *Guidance on the Preparation of Exceptional Events Demonstrations for Wildfire Events that May Influence Ozone Concentrations*. WESTAR and EPA have worked together for years to find workable solutions to the inherent challenges and complexities of documenting evidence of ozone exceptional events. We recognize and appreciate the effort EPA has made in drafting this guidance as an aid to states. However, our assessment of the level of resources necessary to meet the requirements outlined in this guidance is that, in fact, some air quality regulatory agencies do not have the technical abilities or access to the resources and data requirements to comply with the guidance.

Broadly speaking, the proposed guidance is written from the perspective of one or two local fires affecting one air monitor. This does not address the complexity and intricacies of the regional conditions prevalent in the western US. For example, page 8 requires the mapping and inventory of wildfires every day a NAAQS exceedance occurs. During the western wildfire season, dozens to hundreds of wildfires are common. In the summer of 2015, as many as 800 wildfires burned simultaneously in western North America.

The guidance further requires that states conduct emissions analysis for each wildfire for each day. That data are currently extremely difficult to obtain, especially for downwind states. The data gathering and analysis requirements present an extreme resource drain and would not be achievable by some air quality agencies.

EPA states in the preamble to the proposed rule that it will not establish a statistical bright line for an event, yet the guidance requires that the monitored value exceed 99 percent of the historic data for a Tier 2 assessment to be undertaken. This sets a very high bar and a statistical bright line. We support a tiered approach, but do not support a bright line dividing the tiers, but rather a requirement that states submit more detailed supporting documentation. We believe that air quality agencies should be able to submit demonstrations no matter the statistical percentile, so long as wildfire is a contributor to an ozone exceedance. As mentioned in comments on the proposed rule, EPA should provide an option for states to work with their respective Regional Offices and submit demonstrations other than the five types listed in the draft that may have regulatory significance for the states.

The sample documentation in EPA's proposed guidance also includes CMAQ modeling. CMAQ modeling is a resource-demanding, costly, and time-consuming task and therefore this level of analysis is counter to a streamlining objective for all but the

most complex events. In support of these broad concerns about the guidance, we offer the following specific comments and recommendations to EPA.

Tiered Approach

WESTAR supports the tiered approach, however, it needs to be clarified or potentially modified. While we agree that EPA's proposed approach is beneficial in evaluating when certain events clearly qualify for a given tier, the criteria should not limit applicability as there may be additional situations where a lower tier level of analysis may be appropriate. WESTAR would be happy to work with EPA on developing a broader suite of criteria and procedures to support the tiered approach.

Tier 1 It appears that the first tier is intended for the least complicated cases, but it seems that in trying to keep it simple, EPA created a tier that may be too limiting. This tier may work well for events in the low ozone season and would potentially only require the use of time-series plots (in addition to other basic information linking the concentrations with the event). However, if the reason for Tier 1 is to include all those events that can be proven to be significantly higher than historical observations, EPA should leave the option to use Tier 1 to the states. Tier 1 should be an option to be used independent of when the event occurs (i.e. whether in low or high seasons), the magnitude of the ozone concentration increase due to the event, and the method used to prove it. As noted above, the 5-10 ppb threshold should not be an absolute metric. The amount that the event day value is over a nonevent day concentration should be part of the weight-of-evidence and not automatically disqualify the event from Tier 1 treatment. Also, there are less complex statistical approaches that could be used to show that specific values are indeed outliers when considering historical data, including comparison to observations taken under similar weather conditions (an approach currently included only in Tier 3), linear regression and distribution analysis, among other approaches.

Tier 2 The value of Q/D greater than 100 appears to be arbitrary and a generic factor which may be effectively creating a two-tiered system (Tier 1 or Tier 3). Considering the current limitations of Tier 1, it seems that states may end up with a requirement to undertake a Tier 3 demonstration most of the time. In addition, requiring agencies to supply "at least one piece of additional evidence to support the weight of evidence..." (page 19) may place an undue burden on smaller agencies with limited resources (e.g. without the capability to include CO, NO_x, speciation, or light extinction data).

Tier 3 Similar to the concerns discussed for Tier 2 as noted above, some of the analyses required for Tier 3 demonstrations may place an undue burden on smaller agencies with limited resources.

Another concern WESTAR has about the tiered approach is that it appears new monitors (e.g. ozone monitors with less than five years of data) would automatically require a Tier 3 level analysis. Some locations do not have a five-year historical record and the event otherwise may meet the Tier 1 criteria. EPA should allow for the use of

data from monitors with less than five years of data to make weight-of-evidence determinations about the level of effort needed for the demonstration (i.e., which Tier is required). We are willing to work with EPA to develop metrics for differentiating the tiers.

Historical Exceptional Events

The Tier 1 and 2 approaches appear to rely on the deviation from historical observations as one of the criteria used for proof of event-related exceedances. In order to establish the historical background, historical event-related observations should be removed from the dataset (as suggested by the proposed guidance). Considering that historical observations may cover several years (five or more, under the proposed guidance), it is likely that a large number of exceptional events that occurred long before the period of regulatory determination (usually three years) may need to be evaluated and excluded. EPA should clarify the level of scrutiny and hence the level of evidence that the states need to provide for the determination of these historical exceptional events. If EPA is requiring the same level of evidence as described in the guidance, is EPA expecting single, complete exceptional event package applications for each one of the historical events? Would EPA act on these events even if they are beyond the normal range of time for a regulatory determination?

It is also possible that states may have submitted demonstrations for several of these events already, but EPA has not acted on them. The proposed Exceptional Events Rule proposes to terminate review of the EPA backlog. We are requesting that states be able to review and confer with EPA on whether EPA should still act upon any of these historical demonstrations. EPA should clarify if this implies that states will need to re-submit these historical exceptional event packages.

Concerns about SMARTFIRE/BlueSky NEI Emissions

EPA's sole source approach to using the SMARTFIRE/BlueSky system as a source of fire emissions offers several advantages, namely that it is operational and has up-to-date fire activity and archived emissions information for the western United States. However, being an operational/forecast system for day-to-day smoke management planning, it necessarily relies on information that is available in near real-time, and does not include performance evaluation or retrospective analyses as additional and/or refined information becomes available beyond the immediate forecast period. Careful retrospective analyses are a necessary attribute of exceptional event demonstrations.

Since the SMARTFIRE/BlueSky system is operated by the U.S. Forest Service, and EPA provides no support for the ongoing development and maintenance, especially at the national scale needed for exceptional events analyses going forward, it is a significant concern that EPA would assume the system will be operating with sufficient robustness and completeness to address the states' needs. With the purpose of SMARTFIRE/BlueSky focused principally on the important task of operational smoke

forecasting, emphasizing the impact of fire on PM rather than ozone, it is likely that additional improvements and ongoing resources will be needed to support retrospective wildfire and ozone exceptional events analyses. We urge EPA to support improvements to SMARTFIRE/BlueSky for the applications intended in the guidance.

More specifically, the tiered approach in the guidance relies on Q (daily VOC + NOx emissions) to determine the level of detail required for an exceptional event demonstration. The value of Q is highly uncertain because it relies on multiple factors (e.g., fuel loading, fire size, combustion completeness, emission factors, moisture, etc.) that are rarely (if ever) determined with great accuracy. However, the estimate of Q will directly influence the Q/D value and thus determine the tier approach that is needed for an exceptional events demonstration.

The current version of SMARTFIRE/BlueSky produces highly variable emissions estimates. For example, depending on the fuel type chosen, the NOx+VOC emissions can range from 0.002 to 5.48 tons/acre, as shown in the table below excerpted from the fuel beds available in BlueSky/FCCS.

	50,000 Acre Fire Tier 1 Threshold Distance (km)	"Q" (NOx + VOC) Emissions tons/acre
Wheatgrass - Cheatgrass grassland	1	0.002
Idaho fescue - Bluebunch wheatgrass grassland	5	0.01
Sagebrush shrubland	35	0.07
Western juniper / Sagebrush savanna	50	0.10
Urban (aka Other)	70	0.14
Ponderosa pine savanna	120	0.24
Interior ponderosa pine forest	130	0.26
Pacific ponderosa pine - Douglas-fir forest	190	0.38
Douglas-fir / Oceanspray forest	255	0.51
Douglas-fir - ponderosa pine forest	305	0.61
Loblolly pine - Shortleaf pine - Mixed hardwoods	405	0.81
Bluebunch wheatgrass - Bluegrass grassland	520	1.04
Pacific ponderosa pine forest	595	1.19
Ponderosa pine - limber pine forest	650	1.30
Interior ponderosa pine - Douglas-fir forest	665	1.33
Douglas-fir / Ceanothus forest	880	1.76
Douglas-fir - White fir - Interior ponderosa pine	1,040	2.08
Black cottonwood - Douglas-fir - Quaking aspen	1,105	2.21

Douglas-fir - Western Hemlock - Western redcedar / Vine maple	1,150	2.30
Red fir forest	1,715	3.43
Redwood - Tanoak forest	2,335	4.67
Western hemlock - Douglas-fir - Western redcedar / Vine maple	2,740	5.48

The fuel bed in FCCS that SMARTFIRE points to can often be incorrect, especially near the rural/urban interface and near agricultural lands, which are categorized as “urban” (or “other”) in FCCS. Simply updating the fuel type in BlueSky between two options results in very large differences in the effort to support an exceptional event.

In addition, SMARTFIRE/BlueSky is only valid for single-day fires because there is no provision for redefining the fuel loading in an area that burned on the preceding day. It only accounts for the combustion of the short-lived fuels like duff and litter and a small portion of the longer-lived fuels. Because BlueSky does not consider the combustion of longer-lived fuels beyond the first day, it underestimates the total emissions for days following the first day.

Alternatives to BlueSky

Given the concerns regarding use of the BlueSky framework discussed in the comment above, WESTAR recommends that provisions be included in the guidance to allow the use of alternative methods for estimating emissions to the SMARTFIRE/BlueSky NEI methodology such as the WRAP Fire Emissions Tracking System (FETS), and other simpler emission estimation methodologies.

The guidance states that "air agencies can provide fire event emissions and activity data as part of an exceptional events demonstration that the state believes more accurately characterize the event than the information contained in the NEI, provided those emissions and activity data are well-documented and supported." In regards to non-NEI years "... the EPA encourages the use of ground-based observations and local fuel information whenever possible as these factors can significantly improve the resulting estimates of fire emissions." EPA goes on to state "To estimate fire-related emissions in non-NEI years, air agencies may use other techniques to represent fire emissions, especially methods that have been agreed upon by multiple public agencies (e.g., <http://www.airfire.org/data/playground/>) or emission estimates that reside in the published literature." (page 18). The BlueSky playground that EPA links to gives the same emissions as SMARTFIRE/BlueSky. Given that alternatives to BlueSky for estimating emissions in the west will often be necessary, WESTAR recommends that the guidance provide a process for states to work with EPA to allow use of alternate methodologies and data sources. Two such examples are described below:

- WRAP Tools

No mention is made of the WRAP's FETS or WRAP Tools analysis platform (<https://wraptools.org/>) that were built primarily to support retrospective analyses. The data, tools, and visualization capabilities for analyzing ozone impacts from fire are documented in the final report for the Deterministic and Empirical Assessment of Smoke's Contribution to Ozone (DEASCO₃) project completed in late 2013, at: https://wraptools.org/pdf/11-1-6-6_final_report_DEASCO3_project.pdf. Most western states, as well as EPA Region 8 and OAQPS staff have participated in multiple user trainings in 2013-14 for the DEASCO₃ project, which includes the ability to directly relate observed ozone concentration data from the AQS and CASTNET networks with best estimates of prior and concurrent fire emissions classified by fire type (wildfire, prescribed fire, and agricultural fire). WRAP Tools also includes FETS, a fire emissions activity and emissions inventory system (<http://wrapfets.org/>). The WRAP FETS was implemented beginning in 2007 to provide regional fire activity and emissions tracking for both planned and unplanned fire to support implementation of the Regional Haze SIPs across the west to comply with Regional Haze Rule tracking requirements, and has had extensive participation and direction from western state smoke management programs. FETS data are currently being updated through 2015, including providing 2014 fire activity data as inputs to the EPA 2014 fire NEI effort. The WRAP Tools system does not have data newer than 2012 available for analysis at this time, but offers the distinct advantage of combining several strands of necessary data together in one environment for efficient analysis.

- Other Methods

Another alternative to BlueSky would be to use the fuel loading from FCCS (used in BlueSky) in combination with simple assumptions of combustion completeness and emission factors, similar to the way agricultural fire emissions are determined in the NEI. A simple method like this would benefit both EPA and States, because it provides transparent and repeatable emissions calculations.

It is also of great concern that EPA presents the SMARTFIRE/BlueSky system as the only option for acquiring emissions information without acknowledging it can provide no assurances it will continue to be available in the future. It is to the benefit of both EPA and the states to have fire emissions tools available to support these types of exceptional event air quality analyses because they can significantly reduce the burden of performing a demonstration of sufficient detail. A concerted effort must be made to ensure that multiple tools are identified in the guidance and supported so they may continue to be relied upon in the future. It is also imperative that the guidance discuss what other emissions calculation methods will be acceptable, as well as how much justification will be needed when using alternatives to BlueSky.

Ideally, EPA should work with the state and federal fire-reporting agencies to develop a database of daily emissions for each significant wildfire. Such a database would provide states the opportunity to share updated emissions information and thus decrease the resources needed to develop exceptional event demonstrations.