




Exceptional Events: An Oregon Perspective

October 18, 2023
NACAA Fall Forum

The Exceptional Events Resources

- 2016 EE Rule
- EPA Guidance Documents
- EPA Regional Contact
- In-House Subject Matter Experts on EE elements



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

SEP 16 2016

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

MEMORANDUM

SUBJECT: Guidance on the Preparation of Exceptional Events Demonstrations for Wildfire Events that May Influence Ozone Concentrations

FROM: Stephen D. Page, Director
Office of Air Quality Planning and Standards

TO: Regional Air Division Directors, Regions 1 – 10

The purpose of this memorandum is to distribute a non-binding guidance document titled, "Guidance on the Preparation of Exceptional Events Demonstrations for Wildfire Events that May Influence Ozone Concentrations."

The EPA Headquarters and EPA Regional offices collaborated in the development of this guidance to assist air agencies preparing exceptional events demonstrations for wildfire influences on ozone concentrations that meet the requirements of Clean Air Act section 319(b) and the Exceptional Events Rule signed on September 16, 2016, and posted on the EPA's Web site at <https://www.epa.gov/air-quality-analysis/treatment-data-influenced-exceptional-events>. This guidance document provides three different tiers of analyses that apply to the "clear causal relationship" criterion within an air agency's exceptional events demonstration. This document reflects input received from interested parties during the public comment period that closed on February 3, 2016.

Please distribute to air agencies in your Region. If you have any questions concerning this document, please contact Lev Gabrilovich at (919) 541-1496 or gabrilovich.lev@epa.gov.

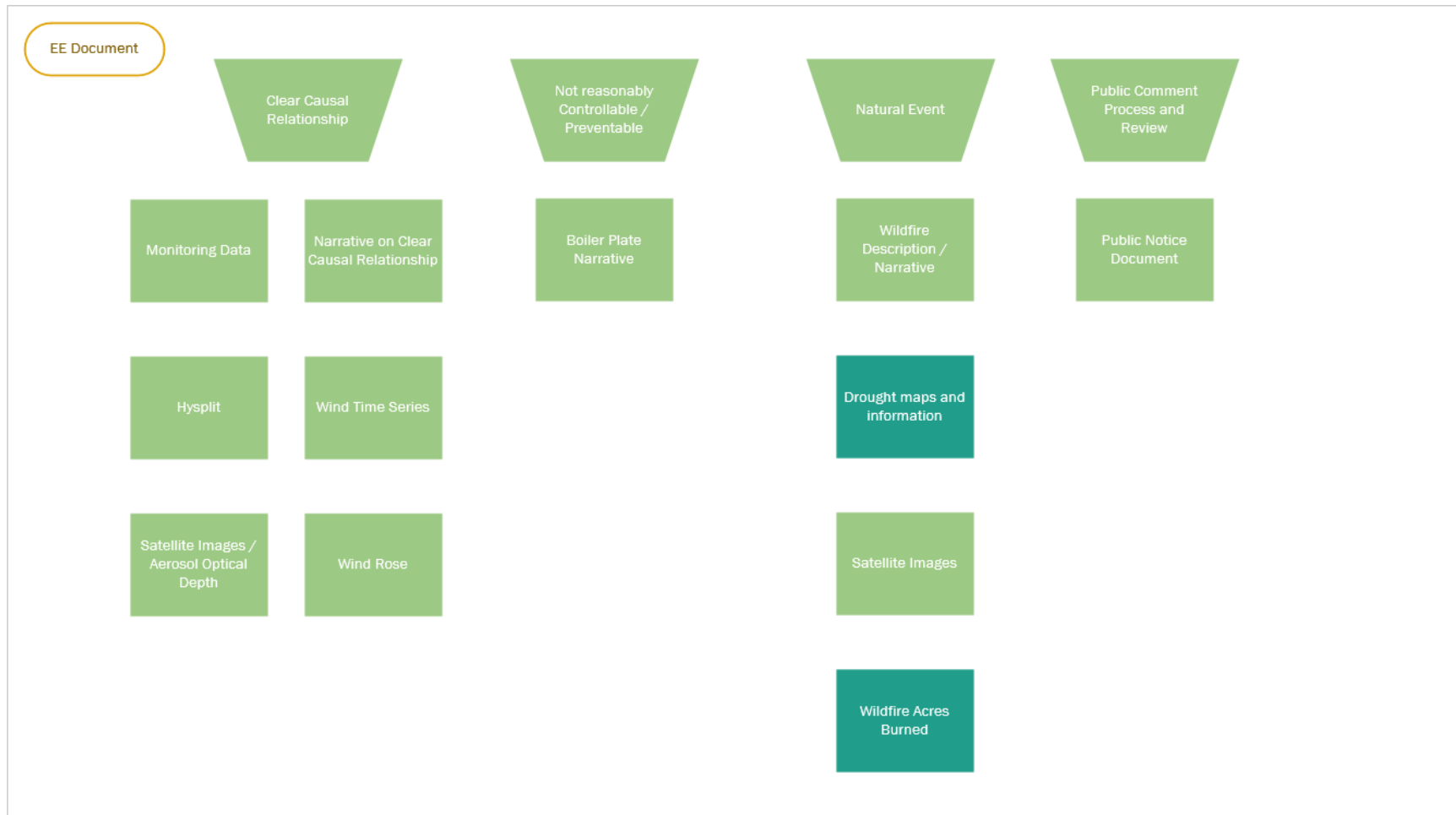
Attachment

Internet Address (URL) • <http://www.epa.gov>
Recycled/Recyclable • Printed with Vegetable Oil Based Inks on Recycled Paper (Minimum 25% Postconsumer)

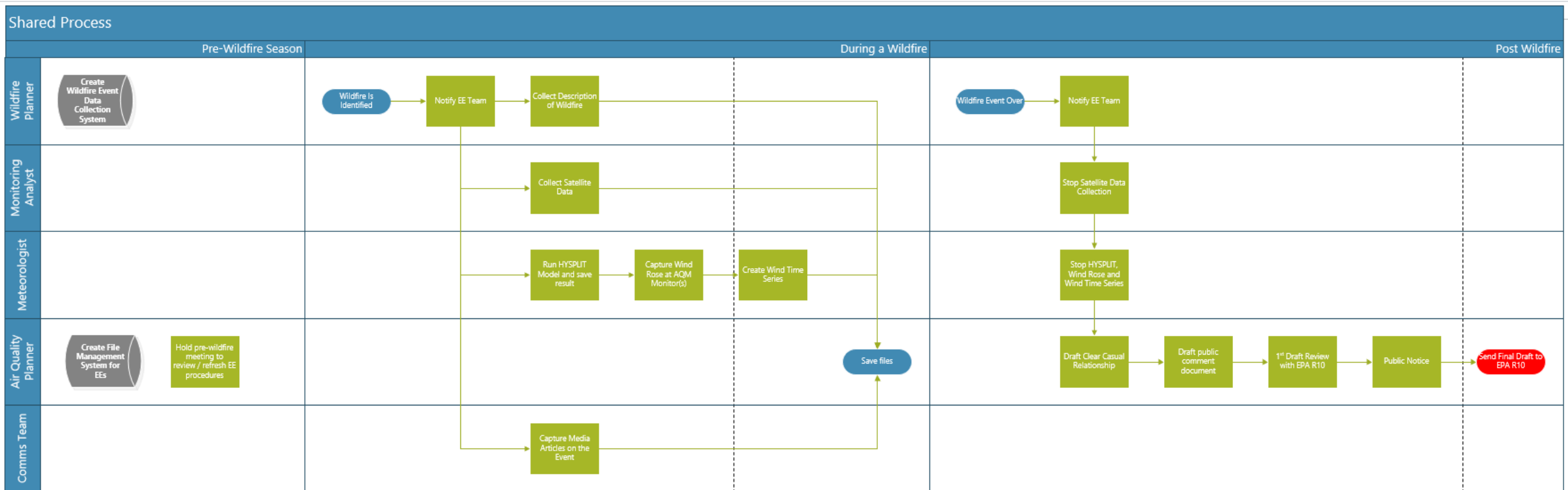
Poll

- Have you discussed exceptional events with your EPA regional contact in the past year?
- Do you know who at your EPA regional office will review your EE submittals?

Conceptual Model



EE Workflow Planning



Poll

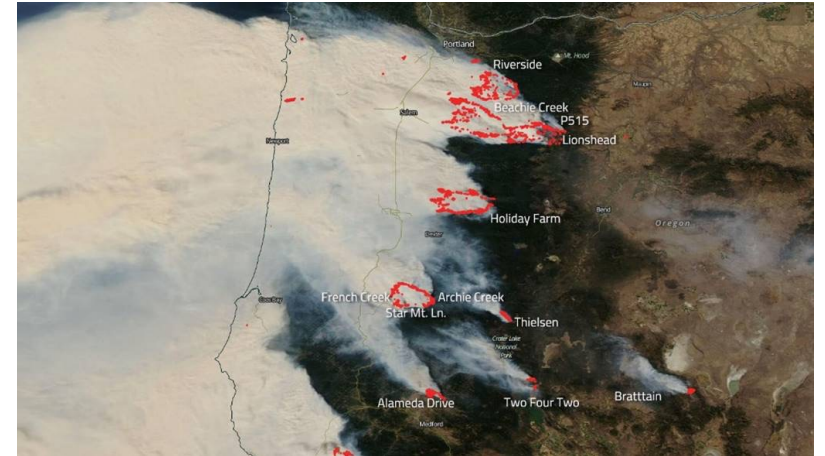
- Have you had a conversation with your local / state counterparts about exceptional event development and workload sharing?

Pre-Wildfire Season

- Organize Templates
- Bring together EE Team
- Plan for EE Drafting, Public Notice, EPA Regional Coordination

During Wildfire Season

- Maintaining ambient monitors
- Support wildfire response efforts
 - Tracking smoke impacts
 - Tracking acres burned and fire response
- Collecting Data
 - Satellite Data
 - ARA Reports, Media Articles, etc.



Post-Wildfire Season

HYSPLIT

Wind Time Series

Satellite Images

Figure 9C. September 12, 2020 HYSPLIT 24 Hour Backwards & Forwards Trajectory from Klamath Falls (Please note "KFP" identifies the monitoring location in Klamath Falls)

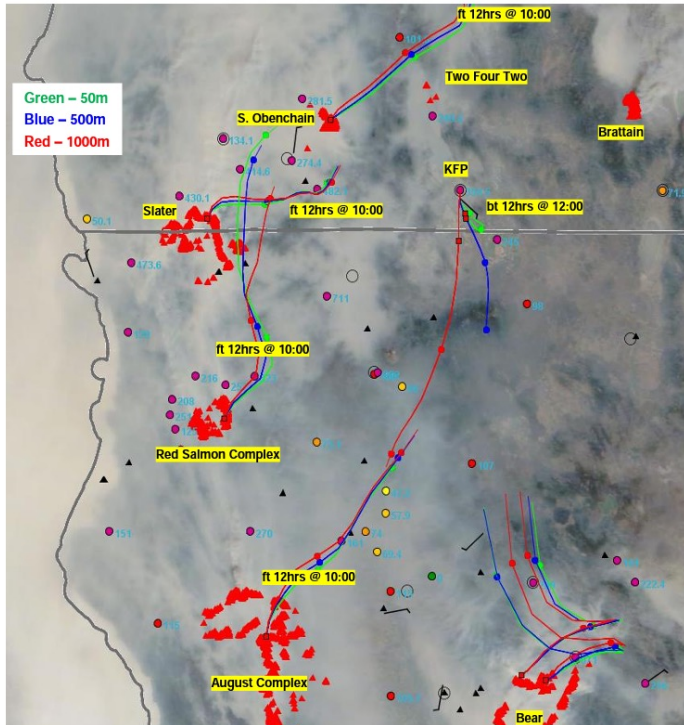


Figure 9A. Klamath Falls September 4 - 19, 2020 PM2.5 and Wind Time Series

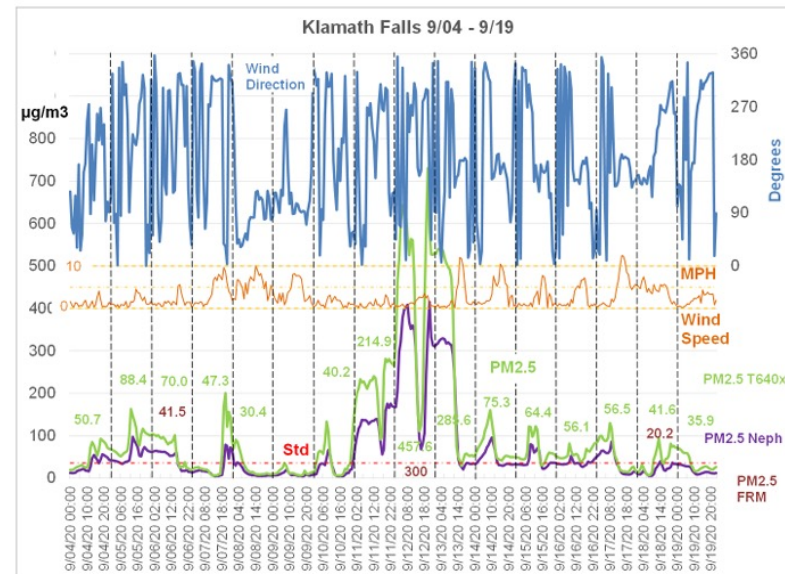
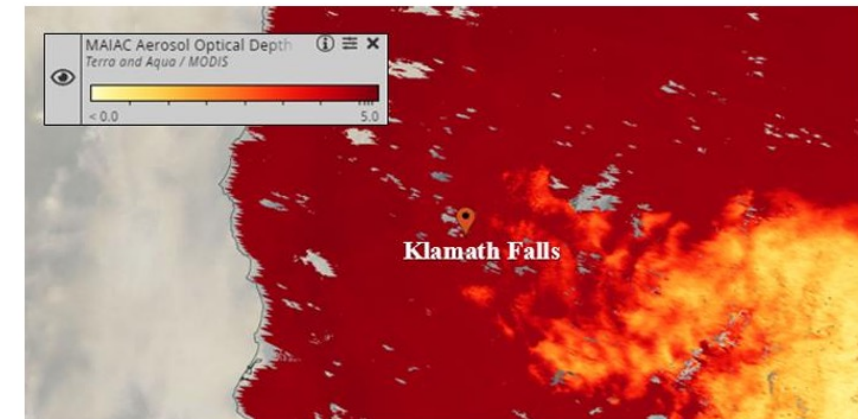


Figure 9B. September 12, 2020 Satellite Photo with Aerosol Optical Depth of Smoke Over Klamath Falls



Poll

- Select all of the products used in an EE that your EPA office requires as part of your submittal:
 - HYSPLIT
 - Satellite Photos
 - Wind Time Series
 - Other

EE Drafting

- Notify EPA of estimated regulatory significant days
- Draft narrative for clear causal relationship
- EPA regional office review
- Public Comment
- Submittal

Things to Consider

- Averaging period matters
- Nonattainment... unless
- Pollutants are not created equal
- Team, team, team
- Plan next year this year
- Innovate!

Questions?

Michael Orman

Air Quality Planning Section Manager

Michael.Orman@DEQ.Oregon.gov

2020 Klamath Falls Exceptional Event Demonstration [link](#)

Title VI and alternative formats

DEQ does not discriminate on the basis of race, color, national origin, disability, age or sex in administration of its programs or activities.

Visit DEQ's [Civil Rights and Environmental Justice page](#).

[Español](#) | [한국어](#) | [繁體中文](#) | [Русский](#) | [Tiếng Việt](#) | [العربية](#)
Contact: 800-452-4011 | TTY: 711 | deqinfo@deq.state.or.us