

Incorporating Smoke Management Plans into Regional Haze SIPs (Arizona Perspective)

Smoke Management Planning Workshop

WRAP 308 Planning Committee & Fire Emissions Joint Forum
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Rule Requirements for 309 SIP

- ◆ Provide for an evaluation of state visibility impairment from smoke
- ◆ Provide for the inclusion of any existing smoke management programs (detailed)
- ◆ Provide for a statewide inventory and emissions tracking system
- ◆ Identify and remove wherever feasible any administrative barriers to alternatives to burning
- ◆ Provide for an enhanced smoke management plan that consider visibility effects in addition to health, nuisance (criteria based)
- ◆ Provide for the establishment of an annual emission goal for fire, excluding wildfire (cooperative)

Status & Authority

- ◆ Arizona had an “advanced” Smoke Management Plan in place
- ◆ Arizona had two fire rules in place
- ◆ Arizona needed statutory authority for RH fire programs
- ◆ Arizona had permit program for burning, but no tracking mechanism for ag (Rx only)
- ◆ Arizona had no formal structure for planning and community involvement

Arizona Approach

- ◆ Rely on SIP template to capture requirements, act as checkbox
- ◆ Include ESMP elements into existing fire regulations (see table 10-1, AZ RH SIP)
- ◆ Make sure Annual Emission Goal captures both ERTs and emission inventory tracking scheme to project emissions; agricultural burning
- ◆ Continuing process for alternatives to burning; fire emissions work group

309(g) and 308 Approach

- ◆ Arizona will be addressing its 8 remaining Class I areas under 309(g) = 308
- ◆ Allows for building on 309 long-term strategies and taking credit for them
- ◆ 308 requirements are more vague; forestry and agriculture
- ◆ Continue working with WRAP
- ◆ See how functional tracking really is; revisions to County (3) burn rules