

WRAP FEJF Meeting
November 30 – December 1, 2005
Seattle, WA

COMPREHENSIVE LIST OF ATTENDEES

FEJF Members:

Darla Potter, WDEQ-AQD, FEJF Co-Chair; Mark Fitch, AZ Interagency SMP, FEJF Co-Chair; Dave Randall, Air Sciences Inc.; Bob Palzer, Sierra Club; Bob Habeck, MT DEQ; Pat Shaver, USDA NRCS; Kara Paintner, USDOJ NPS; Andrea Boyer, Nez Perce Tribe; Tom Webb, USEPA R9

Outer Circle Participants:

Paul Schlobohm, BLM NIFC; Jim Russell, FS / BLM; Suraj Ahuja, USDA-FS; Thomas Dzomba, USFS; Pete Lahm, USDA-FS; Steve Body, USEPA Region X; Angel McCormack, USEPA Region X; Deb Wolfe, MT DEQ; Ron King, AK DEC; Chet Sergent, NV BAQP; Sarah Gallup, CO APCD; Lisa Riener, Quinault Tribe

Other WRAP Participants:

Don Arkell, WESTAR, State Caucus Coordinator; Ken Cronin, NTEC, Tribal Caucus Coordinator; Tom Moore, WGA, WRAP Technical Coordinator

By Phone:

Christi Gordon, USDA-FS; Jill Glass, CARB; Mike Ziolk, OR DOF

PLEASE NOTE: These meeting notes have been prepared to capture questions, comments, and discussion on the various meeting topics. Please refer to the presentations and documents posted in association with this meeting for greater detail.

NOVEMBER 30, 2005 8:00 am – 5:00 pm

Introductions (All) & Agenda Review

FEJF Status (Darla Potter)

- Membership Vacancies
 - A Tribal position on the wildland side is open.
 - An Academic position on the wildland side is open.
 - A General Public position on the wildland side is open.
- Co-Chair [*See resignation posted on the FEJF website.*]
 - Darla Potter announced her resignation as FEJF Co-Chair. The resignation is as a result of Wyoming facing increasingly expanded and complex air quality issues and the determination that the Wyoming DEQ can no longer afford the increased staff time necessary to provide leadership for the WRAP.
 - The FEJF must identify a candidate to work in conjunction with Mark Fitch

- Ideal to have a co-chair approved by the IOC and TOC so that the transition would take place by the March 2006 meeting.
- Any suggestions or interest should be directed to Tom Moore, Mark Fitch or Darla Potter.
- Upcoming WRAP Meetings
 - The next WRAP Board Meeting is scheduled for December 14-15, 2005 in Palm Springs, CA.
 - WRAP Workshop on Reasonable Progress Goals and the Sources and Control Options for Sulfate and Nitrate scheduled for January 10-11, 2006 in Tucson, AZ.
 - WRAP Planning Team meeting scheduled for February 22-23, 2006 in Salt Lake City, UT.
 - WRAP Workshop on Carbon and Fire – to be discussed later in the meeting - anticipated to be in May.

Inter-RPO 2002 National Wildfire EI (Dave Randall, Air Sciences, Inc.)

[See presentation posted on the FEJF website.]

- As the request by EPA to revise the SCC codes used by the WRAP is a fairly recent request (i.e., within the last two days), agreement to have the Phase III/IV Task Team consider the refinement of the SCC codes, per EPA's request, as well as application of the revised SCC codes to the Phase IV EI.

Evaluation of Existing Fire Tracking Systems (Dave Randall, Air Sciences, Inc.)

[See presentation posted on the FEJF website.]

- Pete expressed that there may be interest for a FTS that is an Inter RPO system. Some additional funding may be available if this is pursued.
- This is contrary to the major direction of the FEJF FTS to keep it simple to start, and then expand in the future as necessary.
- Need to have FTS breakout to launch the next steps at the March meeting
- Need to post the Workplan on a FTS Task Team page on the FEJF

Regional Coordination Guidance (Deb Wolfe)

[See presentation posted on the FEJF website.]

- Please confirm what is meant by "Burn Type"
- Why use of fuel loading versus emissions? Because everyone, even a new hire, should be able to provide a fuel loading estimate where they would not be able to easily estimate emissions.
- Think of the five basic elements as "currency" that is traded between burners and regulators, which can be augmented as we go into the future.
- Public involvement – Does the Guidance address the lack of intra-state coordination? No, the focus of the Guidance is inter-jurisdiction coordination. Intra-state coordination is recognized as being very important, however, the focus of the Guidance is on a regional basis.
- Open burning is not within the purview of the FEJF and therefore not within the purview of the Guidance. The overall applicability of the Guidance should be stated so that it is clear that it does not apply to open burning.

- The Guidance is focusing on the basic elements (e.g., think of it as a phase 1). Adding meteorological information, air stagnation advisories are more complex elements (e.g., think of it as a phase 2).
- Concern raised about “conduct joint enforcement” being a non-starter that may raise the hackles due to state and tribal sovereignty. Suggestion not to waste too much time worrying about topics like that now, can be kept on the list for future voluntary coordination.
- California has 13 air pollution control districts and not all of them follow the same regional coordination process.
- On the 2nd to last slide “Summary of Guidance Document”, change the second bullet to “...reduce planned fire emissions” as it is not just limited to “anthropogenic” events.
- The Guidance is envisioned to be a dynamic document, not a static document.
- Can the Guidance specify three initial coordination areas? E.g., 1) areas bordering jurisdictions that can be affected, 2) tribal area within or exterior to states that can be affected, 3) distance to coordinate regionally. Incorporate where coordination needs to take place to identify the proverbial playing field. Suggest “pods” of coordination groups. See the spatial applicability of the Guidance document that has been prepared to date.

WRAP-FEJF Outreach Materials for Regional Haze Implementation Planning (Darla Potter)

When the §309 Regional Haze Implementation Plans were being prepared through stakeholder outreach, the WRAP – FEJF and §309 states prepared some outreach materials for fire. Two such outreach documents are:

- Smoke Impacts and Regional Haze
 - One page flyer prepared by the WRAP Communications Committee and WRAP FEJF to be distributed by states to regional haze stakeholders.
- WRAP Activities Related to Fire Emissions
 - More detailed document (this version was prepared by Wyoming from a document prepared for use in Arizona) to be distributed by states to fire stakeholders.

Should the attached outreach materials be modified by the FEJF for the §308 Regional Haze Implementation Planning process? Yes. The documents may be particularly helpful to the Implementation Workgroup.

Suggested modifications.

- Smoke Impacts and Regional Haze
 - Co-chair information
 - Website information
- WRAP Activities Related to Fire Emissions
 - Add Executive Summary (1 page) that is a bulleted list of FEJF workproducts
 - Add 308 regulatory language
 - Add section on Guidance:
 - Natural / Anthropogenic
 - Regional Coordination
 - Feasibility Criteria
 - Update technical documents section:

- Add Alternatives on Wildland – final
- Delete Alternatives to Burning Whitepaper
- ERT Work
- EI: Phase I, II, III, IV
- InterRPO Wildfire EI
- Sensitivity Runs
- FTS
- FETM Review

Phase III & IV Emissions Inventories (Dave Randall, Air Sciences, Inc.)

[See presentation posted on the FEJF website.]

- What are the seasons? Based on the literature. Winter – December, January, February; Spring – March, April, May; etc.
- Has EPA bought off on the ERT seasonal suites?
 - Have EPA review the regional seasonal ERT suites.
 - Tom Webb – suggestion that when there is something for EPA to review, use a conference call to present it to EPA to present it for discussion and setting a deadline for response.
 - Have Tom Pace review the ERT regional seasonal ERT suites.
- Remember, that the 2018 results will present a range of scenarios not just one magic number.

Monthly conference calls

- The idea of having monthly conference calls to check on the status of the active FEJF tasks was discussed and supported. The concept is for these calls to last 1 hour and focus on status updates for ongoing tasks.
 - The monthly conference calls will be held the 4th Tuesday of the month at 10 am MTN.
 - Upcoming conference calls
 - December 20, 2005 (moved to 3rd Tuesday due to the holidays)
 - Testing of EDMS with the fire EI – results (invite Paula Fields)
 - FEJF Workplan and Budget
 - January 24, 2006
 - Model Assessment Tasks: RMC Sensitivity Runs Phase II – small fires & plume rise (January conference call)
 - No call in February due to meeting
 - March 28, 2006
 - April 25, 2006
 - May 23, 2006 *[Cancel due to Carbon/Fire/Dust Workshop]*
 - June 27, 2006

Schedule Next Meetings

- Spring 2006
 - March 7-8, 2006
 - Albuquerque, NM – suggested La Posada De Albuquerque, which is downtown
 - Breakout sessions

- Fire/Carbon/Dust Workshop
 - May 17-18, 2006 [*Date Conflict for DEJF – Moved to May 24-25*]
 - Sacramento, CA
- Summer 2006
 - July 11-12, 2006
 - ID Coeur d’Alene, NV Lake Tahoe, OR Portland (McMenamin’s Edgefield)
- Fall 2006
 - Mid- to Late- October
 - In conjunction with AK fall fire review
 - Anchorage, Alaska
- FEJF Meeting Topics
 - Based on task deliverables
 - Consider interactions with other Forums or Workgroups
 - Active Task Topics
 - Inter-RPO Wildfire Emissions Inventory, including additional tasks (March?)
 - ERT Technical Tool Development (March)
 - Regional Coordination of SMPs (March – breakout session?)
 - Fire Tracking System (March – breakout session)
 - Phase III & IV Emissions Inventory – final presentation (March)
 - Model predicted impacts – differences between EIs (March)
 - Fire/Carbon/Dust Workshop (March – breakout session?)
 - WRAP Topics as Related to Fire
 - Regional Haze Implementation Plan technical update
 - Attribution of Haze
 - Technical Support System
 - Regional Modeling
 - FEJF Workplan and Budget (March – results from WRAP Planning Team meeting)

WRAP Carbon/Fire/Dust Workshop (Tom Moore / Lee Alter)

- Objective – stems from RHR and reasonable progress demonstration, pollutant specific criteria, measurements and trends,
 - Break down by pollutant, bring in summary format for all information that the WRAP has learned about that pollutant - Fire and Carbon, Dust
 - Monitoring
 - Emissions
 - Modeling
 - Sensitivity analyses
 - Which data sources more certain than others
 - How do we know that the strategy is reasonable
 - Educate
 - What is important
 - What is the bottom line
 - What do we know about the EIs

- How do we go from the EIs, to the modeling, to how to write the implementation plan
 - What are the coordination issues
 - What we know about fire and carbon
 - Paint the big picture
 - Weight of evidence
 - TSS online by that point in time
 - CoH (carbon)
 - AoH (carbon)
 - Other sources of carbon
 - EPA reasonable progress guidance – fire/dust entirely different animal
 - What do we know enough about to put in the implementation plan, what don't we know and need to look at further for future implementation plan
- Tentative Dates: May 17-18, 2006 [*Date Conflict for DEJF – Moved to May 24-25*]
 - Suggested location: Sacramento, CA
 - advantageous to the target audience to have fire/carbon/dust during the same workshop
 - one day fire / one day dust
- FEJF participation will be key to the success of the workshop
 - FEJF organize and present to inform those working on the planning process, administrators and leaders working to achieve planning and implementation of the regional haze rule
 - Pairs and groups of people who do the burning in the same room, what is happening on the land management side as well as the regulatory side
 - Keep it simple and understandable
 - Target audience: implementation workgroup (regulatory side of states/tribes who don't have a lot of knowledge about a specific source category)
 - Identify the Speakers / Agenda
 - Another set of eyes on the results and how to present them
- FEJF Task Team: Bob Habeck, Darla Potter, Mark Fitch, Kara Paintner, Jim Russell, Dave Randall
 - 1st Conference Call after the Reasonable Progress / Sulfate / Nitrate workshop - January 18, 2006 10 am MTN

Natural / Anthropogenic Guidance (Bob Habeck)

- Overview – Nov 21, 2005 conference call
- Review changes made to Process Paper
- Review changes made to Guidance
- Further changes to Guidance agreed upon at the meeting in Section 3.5 (page 12)
 - Delete "...related to smoke management"
 - Delete last two bullets
 - "Following incident, burner and regulator conduct after action review.
 - Regulator takes appropriate air quality management action."
 - Translate remaining four bullets into sentences in the previous paragraph to read as follows

- “Burners and regulators are encouraged to work cooperatively before, during, and after an escaped prescribed fire incident. The recommended coordination process is that following an escaped prescribed fire incident, the burner takes appropriate fire management action and, as soon as practicable, the burner notifies the regulator of the incident. The burner and regulator share information during and after the escaped prescribed fire incident regarding categorization.”
- Consensus Agreement to finalize the Guidance

FEJF Workplan and Budget (Darla Potter / Mark Fitch)

- It is time again to reevaluate the FEJF Workplan and Budget given that no new monies for contractor support are in the immediate future
- Initial thoughts
 - Reallocate \$25,288 for Assessment of Apportionment Methods
 - Retain \$25,000 for Smoke Management Technical and Policy Workshop
 - Reallocate \$42,700 for Regional Coordination of SMPs
 - Need \$50,000 - \$60,000 for Fire Tracking System
 - Lack of certainty on retaining or reallocating \$60,000 for User Guidance and Review of Feasibility Criteria for WRAP Fire Policies.
 - Feasibility criteria is addressed to a certain degree in the Alternatives to Burning reports – one on Wildland and one on Agricultural land
 - Need to address funding for Air Sciences Inc. development of ERT Technical Tool.
 - Need to address funding for Air Sciences Inc. Preparatory (and possibly interpretation) work for the Sensitivity Analyses for small fires and plume rise.
- Need to identify a list of unanswered questions / ongoing evaluation / etc. that will need to be addressed in the future once smoke management programs, fire tracking, use of ERTs, etc. has been implemented on the ground and we are starting to make progress under the regional haze rule implementation plans.
 - Topics identified in previous workplans that remain unanswered
 - Effects of Smoke Management Techniques in Reducing Regional Haze Impacts at Class I Areas
 - Agricultural Alternatives to Burning Report Expansion (additional examples)
 - International Emissions
 - Biomass Utilization Assessment
 - Ongoing updates and modification of FEJF Guidance, to be identified as the need arises
 - ESMPs
 - What criteria
 - How different/same
 - Application of
 - Is it OK
 - Further strategies and feasibility for emission reductions
 - How states/tribes might customize ERT suites
 - Is any further guidance needed by 308 states/tribes?

- 1st set of regional haze implementation plans
 - Research will catch up to the numbers which will be captured in the process of implementing ESMPs, FTSS, N/A categorizations, ERT usage, etc.
 - 309 plans different from 308 – how to factor that in – will take more experience
- 2nd set of regional haze implementation plans
 - More information on ERTs
 - Generate need to develop more up to date ERT information

DECEMBER 1, 2005

Open discussion of the role of fire in relation to the other sources for regional haze

{The notes below are also relevant for consideration for the Fire/Carbon/Dust Workshop.}

- Identify specific questions that we want answered from the technical analyses
- Interpretation of the modeling results is key
- Role of fire in relation to the other sources for regional haze (monitoring and modeling results)
- 1st set of 308 plans may be an explanation about the role of fire in degrading visibility, in the 2nd set of plans more strategies for fire may be realistic when it is determined where and how to focus our efforts
- Explain what is important to know about fire in our own words
- Audience has different expectations: states, tribes, land managers, etc.
- Preliminary information that FLMs can take back and identify timelines for when change in smoke management will need to occur
- Realign way of thinking with burners that AAQS are just as important as visibility protection
- State by state, tribe by tribe coordination and determination of requirements for the regional haze implementation plans
- We already know that fire will be increasing and that aggressive implementation of ERTs needs to start occurring

Emission Reduction Technique Technical Tool (Mark Fitch / Dave Randall)

- Effort to date focused on compilation of ERT percent reduction and frequency of use information into a form that can be utilized in the emissions inventories
- Next step take what we have for organized information and make it useful at the smoke managers desk level
- What form does the ERT technical tool need to be? Paper look-up table
 - Ability to give burners credit for ERT use
 - ERT emission reductions need to be “buyoffable”
 - Identify easy to complex ERTs
 - Identify ERT bundles or suites
 - Need to have both the ERT Emission Reduction Factors table (each individual ERT and emission reduction percentages) as well as ERT regional seasonal suites (emission reduction percentages and frequency of use)

- General guidelines about how to combine ERTs so that jurisdictions can “roll-their-own” ERT bundle or suite and determine the appropriate emission reduction percentage: fuel reductions are additive
- Needs to be used in the FTS
- Verifiable by EPA
- Reliable
- Consistency
- Excel spreadsheet
- Air Sciences will take a shot at refining the ERT look-up table
- Rollout / information sharing / training / communication

Regional Coordination Task Team Breakout Session (Deb Wolfe)

[See version 6 document posted on the FEJF website.]

Participants: Deb Wolfe, Bob Habeck, Andrea Boyer, Lisa Riener, Ken Cronin, Bob Palzer, Mike Ziolk (phone), Christi Gordon (phone)

- Working session focused on version 6 document refinement using redline/strikeout to reflect revisions and wordsmithing.

Technical Breakout Session

Participants: Mark Fitch, Darla Potter, Dave Randall, Don Arkell, Tom Moore, Chet Sergent, Sarah Gallup, Pat Shaver, Thomas Dzomba, Pete Lahm, Jim Russell, Paul Schlobohm, Kara Paintner

Phase III/IV Task

- Review of Phase IV Projection EI information presented on November 30
- Distribution of wildfires is not dependent on the distribution of WFU, as discussed at the November 1-2 Technical Workshop #2
- A lot of confusion between “Base Case” and “Baseline” – proposed solution “2018 Base Case” “’00-’04 Baseline”

SCC Codes

- Review of request from Tom Pace, EPA OAQPS
- Discussion of request
- Pete contact Tom Pace to determine what the definition of “flaming” and “smoldering” is for the purposes of the SCC codes
- Decision
 - Modify EPA SCC table to meet the WRAP FEJF’s needs
 - Export Phase IV files to RMC with WRAP FEJF SCC Codes used for all previous EIs
 - Export Phase IV files to EDMS with EPA SCC Codes

EDMS Fire Specific Testing Results (Tom Moore)

- Test is underway
- Draft report delayed so no results to present today
- Send out draft report prior to the December conference call

- Invite Paula Fields to be on the December conference call to present the results

Regional Haze Implementation Plan Technical Update (Tom Moore)

Technical Support System

[See two presentations from AoH November 16-17, 2005

<http://www.wrapair.org/forums/aoh/meetings/051116m/index.html>

TSS Scoping Study Results

Sample TSS Pages]

- January beta version should be ready to test drive in the first half of 2006
- Need to look how fire emissions should be displayed – similar time steps and units to other sources (point / area / mobile)

Attribution of Haze

[See presentation from AoH November 16-17, 2005

<http://www.wrapair.org/forums/aoh/meetings/051116m/index.html>

Weight of Evidence Discussion]

Regional Modeling