

Notes from WRAP, Fire Emissions Joint Forum meeting, June 15-18, 1999, Seattle, WA

(compiled by K. Jones)

Note: The FEJF meeting took place over four (4) ½ day sessions during the all-forums WRAP meeting; see attached meeting agenda.

First ½ day session, Tuesday PM, June 15th

Pete Lahm, FEJF Co-chair, opened meeting and described agenda (attached). Passed out list of FEJF task teams (TT's), initial TT leaders and members (attached).

Pete L gave update on FEJF membership. Stated need for more tribal involvement, as well as for environmental representative (Rick Brown no longer with National Wildlife Federation) and local government representative. Keith Jones, FEJF Co-chair, provided update on tribal participation (Northwest tribes showing an interest).

John Kennedy (by speakerphone) and Pete L provided update on Ken Woodard's (EPA-DC) survey of state smoke management programs (SMPs). Ken is using private contractor EC&R to compile basic information on SMPs for general information and to gauge compliance with EPA's Interim Air Quality Policy. Pete L stated contractor has requested all spatial/temporal information on all wildland, prescribed and agricultural fires from 1986-1992 (timed with IMPROVE data), a difficult request to fill and request is on hold. Illustrates point that surveys/questions need to be concise and reasonable and not duplicative. EC&R's survey was distributed for teams to review with opportunity to add and clarify questions as needed. Ken said he'd try to incorporate our ideas in surveys for remainder of contract.

Pete L discussed FEJF budget request to EPA approved by WRAP at March meeting of \$1,200,000 and stated it is unlikely we'll get whole thing; we need to plan on accomplishing work through collaboration/partnering with other groups and projects (e.g. EC&R project). Pete asked if TT's feel they have objectives spelled out well enough. Group answered, yes, through the detailed workplan we prepared and that team leaders reporting progress to FEJF will provide check against workplan objectives. TT leaders need to track work of other task teams and share information.

A review of TT work followed. It was reported by Coleen Campbell that the Basic Smoke Management Assessment and Clearinghouse teams might join forces and use EC&R's work to accomplish portions of FEJF tasks. Carol Whitman reported for Bryan Jenkins on Non-Burning Alternatives (Agricultural) TT. Mark Wagoner asked what will be done with information collected and stated that farmers already know what alternatives are available; a compilation is needed for reference. Comments made that you can't treat alternatives to agricultural burning as "one size fits all," and that "an alternative isn't an alternative if it doesn't work." Agreed that quality control and public review for FEJF is critical so flawed recommendations aren't made to policy makers and regulators who then adopt them blindly. Pete pointed out that the FEJF workplan and the Public Education and Outreach (PEO) TT charge address QA/QC so that

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flawed recommendations aren't made to WRAP. John K spoke on PEO TT work. "Storyline" of FEJF, meant to convey message/mission, is progressing and said he may have something for review by end-of-week. Pete L spoke for Mark Fitch regarding Enhanced Smoke Management Plan TT and reported that work hasn't started yet. Pete also reported that Colin Hardy has committed to assisting with work of the Best Available Control Measures (BACMs) TT. Pete stated that inner and outer circles of FEJF are free to get on and off different TT's as people find out more. Mike Ziolk reported on Fire Emissions TT. No one has yet been assigned to the Prescribed Fire Plan Assessment TT.

Sue Ferguson, USDA Forest Service, made presentation describing two (2) projects she's involved with funded through Joint Fire Science Program. Pete stated he has workplans for these projects and can make them available on request. One project assesses local, regional, and national risks to air quality and visibility impacts from wildland fire. Other project is to implement an improved Emission Production Model (EPM) to predict air pollutant source strength, heat release rate, and plume buoyancy from all fire environments and fuel types.

Pete L closed out ½ day meeting with presentation on July 28 to August 18, 1998 burn project on North Rim of Grand Canyon, in which transmissometers and other means were used to track visibility impacts of fire managed for resource benefits. Stated that a broad public education and outreach program accompanied project, and only two (2) complaints/inquiries were received over the project period.

Second ½ day session, Wednesday PM, June 16th

General issues discussion. Dennis Haddow, USFS, described suit filed against EPA for the recent NAAQS revisions. Suit claims that PM-2.5 standard was arbitrarily set by EPA. Coleen C suggested that regional coordination on smoke management and haze might be supported within her office, but that it is a decision to be made by legislators. Market Trading Forum "annex" report for SO₂ emissions does not include fire emissions; is focused on stationary sources. Dave Randall made comment that schedules/budgets for FEJF TT's will shift over time but that overall charges should not. Coleen said she is not clear if SMPs need to be part of SIPs.

Lengthy discussion of "natural visibility/background" and role of fire. Pete L stated this is addressed in Sec. 308 of Regional Haze Rule (RHR). Mark W asked if for portions of his land previously burned by Indian peoples, would this qualify as "historic emissions?" Comment made that RHR counts all emissions including prescribed natural fire and wildfire. Pete said EPA is interested to hear from us on issue of natural background. Also that EPA Interim AQ Policy had touched on question of how to treat fire as part of natural background through a "white paper" which was an informational document to the policy but was not offered as the EPA position. Dennis H said there is a federal land managers report that gives a range of natural background level estimates for eastern and western U.S., but doesn't single out fire effects. It was decided that Pete would bring up topic in whole WRAP forums meeting Thursday AM. (Bill L-USFWS representative) has done work on this topic and offered to be on work group if one is formed.

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Discussion on RHR sections. Sec. 309 contains Grand Canyon Visibility Transport Commission recommendations almost verbatim. It is a state decision whether to go with Sec. 308 or 309, but to go 309 state must show what effects are to all Class I areas (presently Utah is only state that has done this analysis). A state can go with 308 as part of a regional planning effort (could use WRAP as this vehicle) or 308 alone, or go with 309. Pete L stated the WRAP is not tied to 308 or 309 and the FEJF shouldn't let this decision on the part of states affect its work.

Looked at portions of 40 CFR Part 51 regarding implementation plans pertinent to fire. Dave R pointed out that pg. 214 refers to addressing smoke impacts during permitting and that the FEJF workplan doesn't go that far. Group decided to consider this in TT work when necessary.

Then split into two groups, one to review EC&R's survey questions for Basic Smoke Management Program review, the other to discuss BACMs. Scott Kuehn took lead on former group and additions/changes were suggested that will be sent to Ken Woodard. Latter group decided that the term BACM is confusing when referring to fire emissions as BACM is term used for industrial stationary sources; Best Management Practices (BMPs) will be used in future in place of BACM.

Bill Auberle made brief presentation on International Projects Committee of the WRAP, just formed in March. Don't have a workplan but will serve needs of individual forums upon request for Mexico and Canada issues. Committee is meeting in August.

Third ½ day session, Thursday PM, June 17th

More discussion on what is meant by "natural background" and who is taking lead on issue following Pete L's question to larger group in AM and response from Shawn Kendall that this will be addressed over next 1-2 years through RHR Sec. 308/309 work. Dennis H stated that we now have a "60-year glide path" but to where? Not knowing potentially hurts us eyes of public. (State of Wyoming representative) emphasized that the fire fraction of natural background is a critical question. Group supported idea that Pete will press IOC/TOC, Shawn K and other forum co-chairs on need to know *who* and *by when* issue will be addressed.

Newly formed Northwest Air Managers group is made up of states of ND, WY, MT, ID, OR, and WA, and probably NV in near future. Comment had been made at larger group session that tribes will have a difficult time with limited staff serving on this group in addition to WRAP.

Coleen C and Scott K reported out on BSMP breakout group. Coleen had talked with Ken W in AM. Ken said he is focusing through the survey (the EC&R contract) on southern and western states but is open to other states and tribes being added. Ken said contract is up at end of September. BSMP TT will provide to Ken a request for additional states/tribes to be included, which will include southeastern tribes.

Pete L asked Carol W if Agricultural Air Quality Task Force (AAQTF) had done a survey of agricultural burning and SMPs similar to Ken W's. Answer was no, but Coleen C said WESTAR had completed an agricultural smoke management survey (available from Pete on request).

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Discussion on how to get BIA/tribal SMPs and basic information on reservation lands burning. Keith J will discuss with John Cox of Tribal Data Development Forum. Dave R has information on EPA Region 8 and 10 tribes and offered to help. (Carl G.-BLM) offered to help in this regard from federal land managers (BIA) side. Noted that EPA tribal air quality program coordinators would also be of help.

Shelley Nolde gave update on Non-burning Alternatives (Wildlands) TT and her project work with WGA. Has organized a steering group consisting of states, counties, private interests and FEJF members. Two primary deliverables to project: 1) displaying decision path to using an alternative to burning (or not), which should help with questions from public on need to burn, and 2) identifying administrative barriers to use of alternatives. Another product will be developing an implementation plan (how to get out to target users) for these deliverables. Shelley stated that through NEPA federal land managers have had a process to follow for years but has not worked well for addressing potential air quality effects. Similar to NEPA, WGA project can't provide criteria to cover all situations but can lay out process to follow.

Tom Moore, Arizona DEQ, and Bob Bachman, USFS, of the Ambient Reporting and Monitoring Forum (AMF) joined the FEJF meeting, as did Tony Van Curen, CARB, of the Modeling Forum (MF). Tom stated there will be two (2) primary work products of AMF: 1) developing structure for web site database to post ambient and sampling emissions information, and 2) focusing on Class I monitoring network (IMPROVE), information on visibility conditions annually and every 3-5 years information on visibility impairments for all Class I areas. Tom stated that IMPROVE is growing from 20 to 110 sites nationally.

Bob B described the community-based nephelometer system operated in northeast Oregon by Oregon DEQ and funded by USFS. System is in place to monitor smoke effects and is effective in showing origin of smoke effects. Stated that he feels NEPA process may lead to clarity on "natural background" issue eventually. Regarding issue of natural background, Tony VC stated that we've been manipulating environment for 50,000 years and natural levels will never truly be known. Suggests instead trying to establish a "reasonable visibility management goal."

Pete L asked if AMF is looking at other individual monitoring networks currently in place around western U.S. which can be used to support smoke management or other programs. Tom M noted it was not in the current workplan. Pete also asked where does meteorological monitoring fit into the IMPROVE expansion? Apparently the network of aerosol samplers doesn't include meteorological monitoring. Tom M stated that availability of meteorological information presently isn't factored into site selection for IMPROVE stations. Four (4) criteria are proximity to Class I area, ease of access to site, power availability and site security. Bob B said that fine scale (4 square kilometer) meteorological modeling is being done in northwest now and we'll see more improvements in future. Mike Z emphasized importance of continued support of RAWS stations (operated by a variety of agencies) for use in air quality and smoke management data collection and use.

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Tony VC stated that AMF web site development should provide links/information to smaller monitoring systems and it would be of great benefits to have real-time data on all transmissometers and other instruments collecting data. Pete stated that this type of data could be crucial to ESMP's. Important for FEJF and other forums to have access to information of this type and there is much more to discuss between WRAP forums in terms of information sharing, data collection, providing links between systems, etc. Tony also said he is looking at development of simple modeling tools for analyzing smoke contributions to regional haze.

PM session concluded with general FEJF discussion. Pete L stated that the tasks and budgets established at our Salt Lake City meeting remain. Pete is working with IOC/TOC on issue of dollars to fund travel of stakeholders lacking a travel budget. Shelley N discussed need for specific procedures for preparing RFPs, contracts, etc. and suggested we discuss with John Leary, WGA. Also suggested that we stress deadlines/timelines for TT leaders.

Pete L stated that Mike McCarrison (USFS) will lead Prescribed Fire Plan Assessment TT on interim basis.

Fourth ½ day session, Friday AM, June 18th (Reported by Darla Potter-Wyoming)

1.BMP Collaboration Task Team wrapped-up discussions and has a conference call planned with Collin Hardy for next Friday, June 25.

BSMP Assessment Task Team will draft a letter and suggested changes to EPA's SMP evaluation questions.

John Leary (WGA) addressed the group on the RFP process and budget.

- The EPA Grant money for FY99 is "2 year" money that will spill over into next year so there is not a September 30, 1999 cutoff for signing contracts.
- The forums can put RFPs out before the money arrives from EPA (the mobile source forum is doing this).
- A contract cannot be signed before the money is received from EPA.
- Rich Halvey should have a boiler plate to follow for RFPs and contracts.
- Most RFPs need to go through an open bidding process.
- There is a contract cutoff level (\$25,000 according to Rich Halvey) that would allow a sole source contract without going out for bid but a sole source justification would have to be presented.

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- He was not aware of any RFPs on the WRAP website that could be used for an example.
- The RFP needs to be on notice for 30 days.

Pete Lahm will post the revised FEJF budget as given to WRAP on the www.airsci.com website when provided.

Rich Halvey (WGA) addressed the group on the RFP and contracting process.

- Some reasons for sole source justification are 1) proprietary process, 2) add-on to other work, 3) only people that can do the work, and 4) adjunct work to previous work.
- For a level-of-effort contractor for EPA it may be difficult to get more time/work from the contractor.
- It is probably hard to “give the money back” to EPA to help with the existing contract.
- There should be flexibility in using the EPA Grant money as long as progress is shown for the 4 identified tasks.
- As long as the RFPs include dates, deliverables, and cost information Rich should be able to do the rest of the work.
- The FEJF needs a “formal” process for saying that the contractors work has been done to the satisfaction of the forum (i.e., more than just a phone call).
- Time and materials contracts are o.k.

Timing

- RFPs out on street 30 days
- response and evaluation process
- Allow at least 3 months from RFP to contract letting
- RFPs published in CBD, webpage, and mailed to certain potential contractors.

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- RFPs and supporting information needs to go to Pete and Keith (FEJF Co-Chairs) so that it can be reviewed and forwarded to Rich. (This process of review by the co-chairs and possible distribution to the FEJF will add approximately 30-60 days to the 3 month time frame that follows.)

Tom Webb (EPA R9) addressed the group as the Grant Project Officer.

If the EPA Grant money is cut from that requested, the priorities for the money will be placed with the Annex and SIP support work.

Written mid-year project progress reports from Rich Halvey or WGA/WRAP may be requested. This won't be to the detail that the FEJF should worry about building it into any contract.

Pete mentioned that a reporting/tracking contractor may be necessary for some of the forum workshops, but not necessarily a facilitator. Pete should contact John Leary about this need.

Pete will ask again for clarification of the use of funds for travel of key forum participants who are not forum members. Rich and Tom stated that the forum may need to look outside the box for other travel funding.

The FEJF co-chairs should receive copies on all drafts of task team work (even joint collaborations with WGA) as it goes forward so that they are not "surprised" by work progress and products.

The FEJF will continue to use the Air Sciences website (www.airsci.com) to post FEJF information. A link from the WRAP website will be pursued.

The next "meeting" will probably be conference calls and task team meetings instead of a large FEJF meeting with break-out groups due to membership overlap in the various task teams. Therefore the task teams need to develop a plan of action.

Joint meeting with Emissions Forum

- Emissions quantification and tracking for smoke needs to include spatial and temporal resolution and the tracking of emission reduction techniques.
- The intent of the emissions forum is to look county by county, category by category, for the emissions source characterization and then look at an annual, seasonal, and monthly breakdown.
- For modeling, smoke impacts will probably be assessed using a "background" value until a daily modeling effort is initiated.

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- The emissions forum should provide the FEJF with the emissions inventory needs framework and the FEJF will then need to determine what information to feed to the emissions forum.
- actual emissions will be used for the baseline year and needs to be assembled by the end of 2000 by the emissions forum.
- FEJF needs to convey to Modeling Forum the following two concerns/issues.
- Fire baseline from 1999 will not be available in the detail necessary in this time-frame especially as we are already half way through 1999.
- Projected smoke information can probably be predicted for the emissions forums needs in that timeframe.
- FEJF needs to put land managers and states on notice that the fire emissions information needs to be assembled and what information is required for the various fire categories