

2011 CRB Advisory Committee Meeting February 23, 2011

Committee Members in Attendance

Toni Hardesty – Director of DEQ

Ty Iverson – North Idaho Grower – Vice Chairman
 Patti Gora-McRavin – environmental group – central Idaho
 Courtney Washburn – environmental group – south Idaho – Chairman
 Matt Gellings – eastern Idaho grower
 David Patrick – south central Idaho grower
 Tom Turco – substitute for Dale Stephenson – Health profession
 Andrea Boyer – Nez Perce Tribe
 Lester Higgins – Coeur d’Alene Tribe
 Kevin Greenleaf – Kootenai Tribe of Idaho
 George Robinson – Idaho State Department of Agriculture
 Mike McGown – U.S. Environmental Protection Agency Region 10
 Robert Wilkosz – Idaho Department of Environmental Quality

Committee members absent

Pat Martin – environmental group – north Idaho

Tenure of Committee Members

Ends March 1, 2011	Ends March 1, 2012
Andrea Boyer – Nez Perce Tribe	Lester Higgins – Coeur d’Alene Tribe
Patti Gora-McRavin – environmental group	Kevin Greenleaf – Kootenai Tribe of Idaho
Pat Martin – environmental group	Courtney Washburn – environmental group
Matt Gellings – eastern Idaho grower	Dale Stephenson – Health professional
Nathan Riggers – central Idaho grower	Tim Dillon – north Idaho grower
George Robinson - ISDA	David Patrick – South central Idaho grower
	Mike McGown – EPA Region 10
	Robert Wilkosz – IDEQ

Chairman

Courtney Washburn was elected as Chairman for this meeting. Ty Iverson was elected Vice Chairman and will serve as Chairman at the 2012 meeting.

DEQ CRB Staff Recommendations Presented to Committee

- Modify guidelines in the Operating Guide for observing burns
- Define what is not considered an adverse impact to an institution with sensitive populations
- Define a procedure to ensure burns do not create a hazard for travel on public roadway
- Evaluate the program concentration limit for ozone

Additional Recommendations to DEQ from Advisory Committee

- Modify guidelines in the Operating Guide for observing burns – add the following to DEQ’s recommendation
 - Contact ISP if not observing burns within 3 miles
- Define what is not considered an adverse impact to an institution with sensitive populations – add the following to DEQ’s recommendation
 - Evaluate delayed health effects (attendance records for schools, talk to school nurse/appropriate staff)
 - Evaluate visibility distance triggers
- Define a procedure to ensure burns do not create a hazard for travel on public roadway – add the following to DEQ’s recommendation
 - Train growers on requirements before burn season (specifically stopping distance requirement), work with ITD and local highway districts to assist growers in meeting this requirement
- Evaluate the program concentration limit for ozone – add the following to DEQ’s recommendation
 - Include health effects of ozone to evaluation process
 - Consider other ozone control measures
 - Evaluate the 1-hour PM2.4 emergency authority limit with ozone
- Use of different methods to reach ISP, develop a process to track and evaluate outreach to determine best methods.
- Evaluate burning on the weekends/holidays in the late fall burn season and present at 2012 meeting
- Add history and why Idaho has a CRB program onto DEQ’s website (training – education), especially for the benefit of South Idaho

Recommendations Approved by Director to be Implemented in 2011

1. Evaluate implications of allowing burning on the weekends and holidays. Present evaluation and any recommendation to CRB Advisory Committee at 2012 meeting
2. Modify guidelines in the Operating Guide for observing burns
 - DEQ staff will observe burns on approved burn days
 - DEQ staff will observe burns within 1 mile of ISP
 - DEQ staff will observe burns over 20 acres that are 1-3 miles from ISP
 - DEQ staff must justify and document when they will not observe burns less than 20 acres that are 1-3 miles from ISP
 - The north and south Idaho Smoke Analysts can grant exceptions to the above items – the exception must be documented and include an evaluation of the following:
 - Person conducting the burn – experience with burning and the program
 - Forecasted meteorological conditions
 - Field conditions
 - Terrain and local meteorological conditions
 - Availability of monitoring network
 - If DEQ staff does not observe fields within 3 miles of an ISP, then DEQ will notify the ISP(s) within 3 miles that a burn(s) is approved and that DEQ will not be in the area, then ask that the ISP contact DEQ if they observe smoke at their location.
3. Define what is not considered an adverse impact to an ISP
 - Below $20 \mu\text{g}/\text{m}^3$ (visibility is at least 10 miles) – visibility distance was changed from 5 to 10 miles
 - Conclude that no adverse impact occurred
 - No additional documentation needed unless DEQ received complaint from ISP
 - If complaint received from ISP, short evaluation will be documented.
 - $20 \mu\text{g}/\text{m}^3$ – $26.25 \mu\text{g}/\text{m}^3$
 - Conclude adverse impact unlikely
 - Short evaluation needed to determine whether an adverse impact occurred
 - If complaint received from ISP, full enhanced documentation and evaluation will be documented.
 - Greater than $26.25 \mu\text{g}/\text{m}^3$ (visibility is less than 10 miles) – visibility distance was changed from 5 to 10 miles
 - Adverse impact possible
 - Full enhanced documentation needed to determine whether an adverse impact occurred
 - DEQ will explore how delayed health effects might be taken into account in the evaluation of a possible adverse impact to an ISP by June 1, 2011.
 - DEQ will evaluate the procedure for measuring visibility and correlating that to $\text{PM}_{2.5}$ concentration during the 2011 burn season.

4. Define a procedure to ensure burns do not create a hazard for travel on public roadway
 - Ultimately, this is a Growers responsibility
 - General permit requirement developed by DEQ – “The permittee is responsible to ensure that adequate measures are taken such that the burn does not create a hazard for travel on a public roadway. (per IDAPA 58.01.01.621.02.c)
 - Use “Stopping sight distance as a function of speed” to determine if hazard was created. (from ITD)
 - If possible hazard was created (i.e., visibility is less than the appropriate stopping sight distance) the Grower must have an approved traffic control plan and followed it.
 - If no traffic control plan, or grower did not follow the traffic control plan, then possible violation occurred; DEQ will then follow enforcement procedures.
 - DEQ will train growers on requirement before burn season (specifically stopping distance requirement) and work with ITD and local highway districts to help get growers the information needed.
5. Evaluate the program concentration limit for ozone
 - Evaluation will include
 - Meteorological data on those days where ozone concentration is between 56.25 ppb (75% of NAAQS) and 67 ppb (AQI of 75)
 - Determine whether DEQ is not allowing burning on good or marginal burn days due solely to ozone concentration
 - Other options for addressing this ozone issue
 - Review and summarize the health effects of ozone from EPA documents:
 - Integrated Science Assessment for Ozone and Related Photochemical Oxidants (First External Review Draft) (EPA/600/R-10/076a) (March 2011)
 - The most recent Clean Air Scientific Advisory Committee (CASAC) recommendations for ozone.
 - Determine if change to 75% of the ozone NAAQS is needed, and if so, propose new value at the CRB Advisory Committee meeting in 2012
 - Evaluation, health effects summary, and any recommendation will be presented to the CRB Advisory Committee in 2012
6. Use of different methods to reach ISPs, track and evaluate outreach to determine best method(s)
7. Add history and why Idaho has a CRB program onto DEQ’s website (training – education), especially for the benefit of South Idaho where program history is so new.