

1 **West Silver Valley**

Non Attainment Plan - Reduction Discussions

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2 **Control Measures for WSV NAA SIP (1)**

- DEQ identified 19 stoves had been replaced since 2013 and prior to 2016. Reductions from these replaced stoves will be taken in the attainment plan analysis.

3 **Control Measures for WSV NAA SIP (2)**

- DEQ's technical analysis indicated an additional 35 wood stove replacements occurring in the City of Pinehurst would provide reductions for the SIP to contribute to the demonstration of attainment of the 2012 Annual PM2.5 Standard by 2019

4 **Control Measures for WSV NAA SIP (3)**

- DEQ's technical analysis also identified Federal vehicle and fuel standards being phased in through 2017 would provide reductions for the SIP to contribute to the demonstration of attainment of the 2012 Annual PM2.5 Standard.

5 **Control Measures for WSV NAA SIP (3)**

- The last reduction for this SIP is the voluntary allowances for SIP. The EPA will allow the use of these reductions but only up to 6% of the total reductions needed for the SIP attainment demonstration (The WSV NAA needs 0.36ug reductions to demonstrate attainment, therefore DEQ can claim 0.02ug reductions from voluntary measures).

6 **Additional Reductions for WSV NAA**

- The Targeted Airshed Grant provides funding for other reductions that are not eligible for the attainment plan. These include:
 - An additional 153 woodstove replacements
 - Dry-Wood use program
 - Home weatherization
 - Education and Outreach

7 **Disclaimer**

- DEQ believes the control measures identified above are appropriate and do conform to SIP Implementation Rule Requirements as DEQ has interpreted them, however changes in law continue to occur and the plan will still need to be approved by the EPA based on the rules in place at the time of submittal.

8 **Control Measure Consequences**

- Because the community would not establish local open burning and woodstove reduction ordinances in support of this SIP DEQ and the community have effectively "picked clean" the low hanging fruit for reduction techniques in order to demonstrate attainment for the 2012 PM2.5 Annual Standard.

9 **Future Concerns**

- If the community fails to achieve/maintain the annual standard or the 24 hour daily standard in the future (another expected in 2018) the community and DEQ are likely left with woodstove and open burning restrictions as some of the only viable "permanent and enforceable" reductions available... if another SIP is required.

10 **Community Efforts**

- The community has done a great job in engaging the issue, supporting outreach and education efforts, and highlighting burn condition notifications in the local media. The community must continue to be proactive in getting the word out to the public about proper wood burning practices and best smoke management practices in order to maintain the current momentum and avoid future non-attainment designations. As stated above there is little to no easy fixes left on the table at this time for future SIPs if needed.

11 **Pinehurst Monitor Data Attached
Data Preliminary - Not Official
*2016 through October 21**12 **Exceptional Event Considerations**

- The EPA recently issued their *Treatment of Data Influenced by Exceptional Events* final rule. This rule requires areas that identify wildfire smoke impacts or are prone to wildfire impacts (recurring events) MUST have a mitigation plan in place within 2 years of notification by EPA that the area is subject to a mitigation plan to provide the possibility that any wildfire smoke impacts would be available for treatment as an Exceptional Event (EE).

13 **More Exceptional Events Considerations**

- This rule clarifies that prescribed fire is a human-caused event eligible for treatment as an exceptional event. Measures must be in place including:
 - A Resource Management Plan to satisfy the frequency of events and not reasonably preventable “tests”
 - Basic Smoke Management Practices (BSMP) must have been employed. BSMP is specific in rule.
 - Requirements that collaboration is occurring between air agencies, land managers, and burning community