

TO: Air Quality Board
THROUGH: Bryce C. Bird, Executive Secretary
FROM: Joel Karmazyn, Environmental Scientist
DATE: June 5, 2019
SUBJECT: PROPOSE FOR PUBLIC COMMENT: Amend R307-204. Emission Standards: Smoke Management.

An interagency memorandum of understanding (MOU) between the Division of Air Quality (DAQ) and state and federal land managers has been in place since the 1990's to establish cooperation in providing data and coordination for smoke management for prescribed fires. The signatories to the MOU subsequently developed a Smoke Management Plan (SMP) that describes the operational procedures for prescribed fires on specific lands owned or managed by state and federal land management agencies in Utah. The SMP also details the responsibilities of the organizational structure developed to operate the SMP, including the Smoke Program Coordinator position. The SMP was approved by the Environmental Protection Agency on November 8, 1999, under the Interim Air Quality Policy on Wildland and Prescribed Fires. The requirements established in the SMP provide the framework for R307-204.

The primary purpose for amending R307-204 is to meet requirements set forth in 2019 H.B. 155, which states:

“In the rules made by the board...the board shall require the land manager to:

- (i) describe the use of a state, county, or municipal resource in the large prescribed fire or large prescribed pile fire;
- (ii) provide the division the burn plan for a large prescribed fire or large prescribed pile fire by no later than one week before the day of the burn window; and
- (iii) notify the division of a nonfull suppression event once a fire becomes a nonfull suppression event.”

Additionally, this amendment reduces redundancies and outdated portions of the rule, while also streamlining it. The significant revisions include:

- Removing outdated smoke policy terminology, such as, wildland fire use, and plan stages.
- Combining Section R307-204-6 with R307-204-7 and Section R307-204-8 with R307-204-9.
- Deleted outdated language regarding adjusting fire emission factors. DAQ inventory personnel adjust fire emission factors as per EPA directive.
- Removing conformity from the rule. On May 21, 1998, EPA issued an "Interim Air Quality Policy on Wildland and Prescribed Fires." Under this policy, federally prescribed fire projects would be considered to conform with the implementation plan if they are managed under a certified basic smoke management program. The SMP meets all of the criteria. The

interim policy is available on the Office of Environmental Policy and Assistance's web site at:

<https://www.epa.gov/general-conformity/general-conformity-training-module-35-demonstrating-conformity>

There is no relaxation of the technical requirements; therefore, there is no potential for backsliding.

Recommendation: Staff recommends that the Board propose amended R307-204 for public comment.