



### **Exceptional Events**

Air Quality Management, Policy and Demonstration Tools

## Neil Frank USEPA/OAQPS/Air Quality Assessment Division

AQS Conference August 21, 2008





# New Exceptional Events Rule The Basics

- Sets criteria and process for EPA to agree to exclude eventinfluenced data when determining NAAQS compliance and design values.
  - Section 319 of the Clean Air Act, as amended by the SAFE-TEA-LU Act of 2005 required EPA to promulgate a rule to govern the review and handling of exceptional events data.
- Final rule published March 22, 2007 (Effective date = May 21, 2007)
- Scope: General rule which applies to all NAAQS.
  - CFR language defining NAAQS for ozone, PM2.5, and PM10 explicitly provides for exclusion of event-influenced data.
  - Preamble states EPA intention to effectively apply same scheme for other NAAQS also, via 107(d)(3) discretion.
  - EPA will formally extend the rule to other pollutants as NAAQS are revised, in time for new mandatory designations.
- Replaces previous EPA policy/practices.

## Definition of Exceptional Event

"The Criteria" for potential data exclusion [§ 50.14]

- Event affected air quality
- Event was either
  - Natural or
  - Caused by human activity and unlikely to recur at a particular location
- Event was not reasonably controllable or preventable
- Event was not:
  - Air mass stagnation
  - Inversion
  - High temperature
  - Lack of precipitation
  - Source noncompliance
- EPA Administrator has determined through the process established in the rule that it was an exceptional event.

### The Process to Justify Data Exclusion

### Section 50.14 of the EE Rule

- Treatment of Air Quality Monitoring Data Influenced by Exceptional Events
  - A State may request that EPA exclude data related to exceedances or violations of a NAAQS that are directly due to an exceptional event from use in regulatory determinations
    - By demonstrating to EPA's satisfaction that the event caused a specific air pollution concentration at a particular air quality monitoring location.
  - Demonstration to justify data exclusion
    - May include any reliable and accurate data
    - Must demonstrate a *clear causal relationship* between the *measured exceedance or violation* of the affected standard and the event.

### The Process to Justify Data Exclusion

Section 50.14 of the EE Rule

- Provisions for data influenced by emissions from certain fireworks
  - Fireworks significantly integral to traditional national, ethnic, or other cultural events including, but not limited to July Fourth celebrations.



## Notify the Public and EPA

- Notify public of the occurrence (or anticipated occurrence) of the event
- 2. Notify EPA by Flagging the data.
  - Flag data in AQS and provide event description by July 1 of following year.
    - Also provide initial event description
  - Give public notice and opportunity to comment.
  - Types of Flags
    - Request data exclusion
    - Informational only

## Old and New EE Qualifiers

<b>Exceptional Events</b>			
Code	Description		
D	SANDBLASTING		
F	STRUCTURAL FIRE		
Н	CHEMICAL SPILLS & INDUST. ACCIDENT		
I	UNUSUAL TRAFFIC CONGESTION		
J	CONSTRUCTION/DEMOLITION		
K	AGRICULTURAL TILLING		
L	HIGHWAY CONSTRUCTION		
М	REROUTING OF TRAFFIC		
N	SANDING/SALTING OF STREETS		
0	INFREQUENT LARGE GATHERINGS		
Р	ROOFING OPERATIONS		
Q	PRESCRIBED BURNING		
R	CLEAN UP AFTER A MAJOR DISASTER		
Z	Other event		

Natural Events			
HIGH WINDS			
STRATOSPHERIC OZONE INTRUSION			
VOLCANIC ERUPTIONS			
FOREST FIRE			
HIGH POLLEN COUNT			
SEISMIC ACTIVITY			
SAHARA DUST			

	Inform-	Request
	ational	Exclusions
Event Descripition	Code	Code
African Dust	IA	RA
Asian Dust	IB	RB
Chem. Spills : Industr. Accidents	IC	RC
Cleanup After a Major Disaster	ID	RD
Demolition	ΙE	RE
Fire - Canadian	IF	RF
Fire - Mexico/Central America	IG	RG
Fireworks	IH	RH
High Pollen Count	П	RI
High Winds	IJ	RJ
Infrequent Large Gatherings	IK	RK
Other	IL	RL
Prescribed Fire	IM	RM
Seismic Activity	IN	RN
Stratospheric Ozone Intrusion	10	RO
Structural Fire	IP	RP
Terrorist Act	IQ	RQ
Unique Traffic Disruption	IR	RR
Volcanic Eruptions	IS	RS
Wildfire-U. S.	IT	RT
Wildland Fire Use Fire-U. S.	IU	RU

## When May Air Quality Data be Excluded? "The Required EE Evidence" [§ 50.14 (3)]

- Demonstration to justify data exclusion shall provide evidence that:
  - The event satisfies the *Statutory Definition of Exceptional Event*
  - There is a clear causal relationship between the measurement under consideration and the event that is claimed to have affected the air quality in the area
  - The event is associated with a measured concentration in excess of normal historical fluctuations, including background; and
  - There would have been no exceedance or violation "but for" the event.
- Provided that all the Exceptional Event Rule requirements are met, EPA shall exclude such data from use in determinations of a NAAQS violation.

Note: The rule has special provisions regarding fireworks and prescribed fires. The preamble discusses other situations of interest.

### Submittal of The EE Demonstration

- Not later than the lesser of
  - 3 years following the end of the calendar quarter in which the event occurred
  - or 1 year before EPA plans to use the data for a regulatory decision.
- A State must submit the public comments it received along with its demonstration to EPA.
- In general, the type, amount, and detail level for presentation of evidence will vary by the circumstances for each event.

## Types of Data to Consider for EE evidence

- Event characteristics: type, size, location, duration, estimated emissions, press accounts, response agency records, photos, videos, etc.
- Comparisons to the concentration history at that monitor.
- Comparisons to nearby monitors.
- Diurnal patterns of concentrations, if available.
- PM2.5 composition data, if available.
- Satellite data products and related models.
- Weather data.
  - Wind direction and speed.
  - Weather maps.
  - Trajectories (HYSPLIT or other).
- Wind roses and pollution roses.
- Statistical models relating air pollutant to weather.

# New On-Line Tools to assist with assembly of evidence

Products of Rudy Husar, Washington University

- Graphics and access to relevant EE data sets
  - Trajectories, satellite images, spatial and temporal air quality displays, etc.

On-line tools are expected to remain operational as part

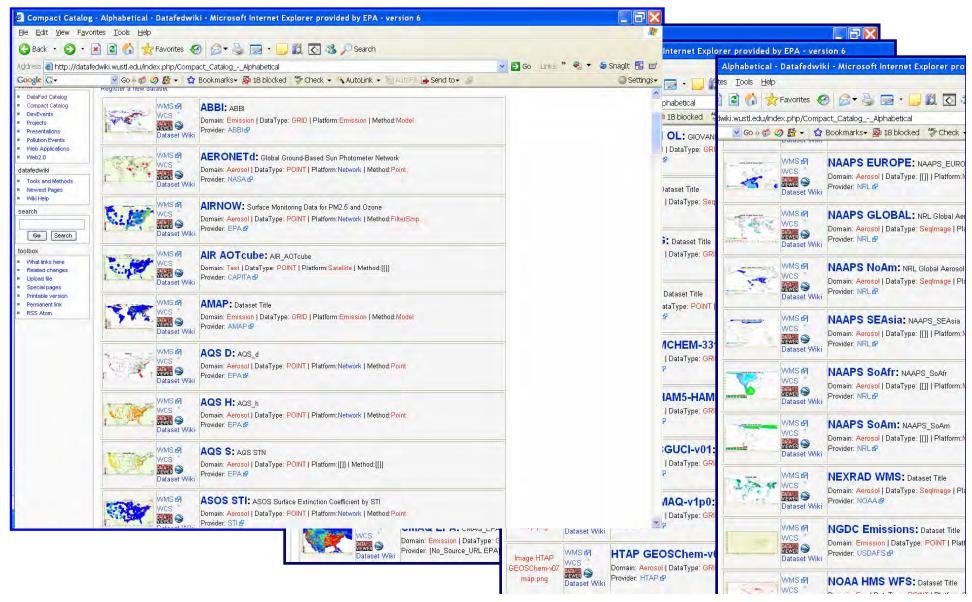
of "DATAFED.NET" and ESIP

(Federation Of Earth Science Information Partners)

- In particular, see:
  - Evidence for Flagging Exceptional Events
    - http://wiki.esipfed.org/index.php/Evidence\_for\_Flagging\_Exceptional\_Events
    - Analyst's Console.
  - EE Community Work Space
    - http://wiki.esipfed.org/index.php/Exceptional\_Air\_Pollution\_Event\_Analysis\_ Community\_Workspace

### **Catalog of Federated Datasets**

Air Quality, Emissions, Meteorology



### **Data Views Catalog:**

CATT\_FRMPM25\_Traj

FRMPM25\_diff

FRMPM25\_30DayMedian

FRMPM25\_Day

AIRNOW\_PM25

CATT\_FRMPM25

VIEWS SO4

VIEWS\_OCfCombined

MODIS\_Aqua\_RGB\_OnEarthJPL

MODIS\_Terra\_RGB\_OnEarthJPL

MODIS\_AOT

OMI\_AI

OMI\_NO2Trop

MOPITT\_CO

NAAPS\_NoAm\_AOT

NAAPS\_NoAm\_Sulf

NAAPS\_NoAm\_Dust

NAAPS\_NoAm\_Smok

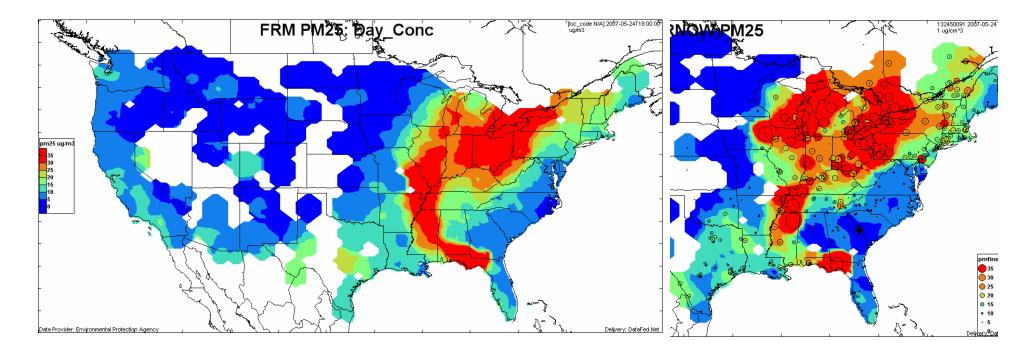
NOAA\_HMS\_FirePix

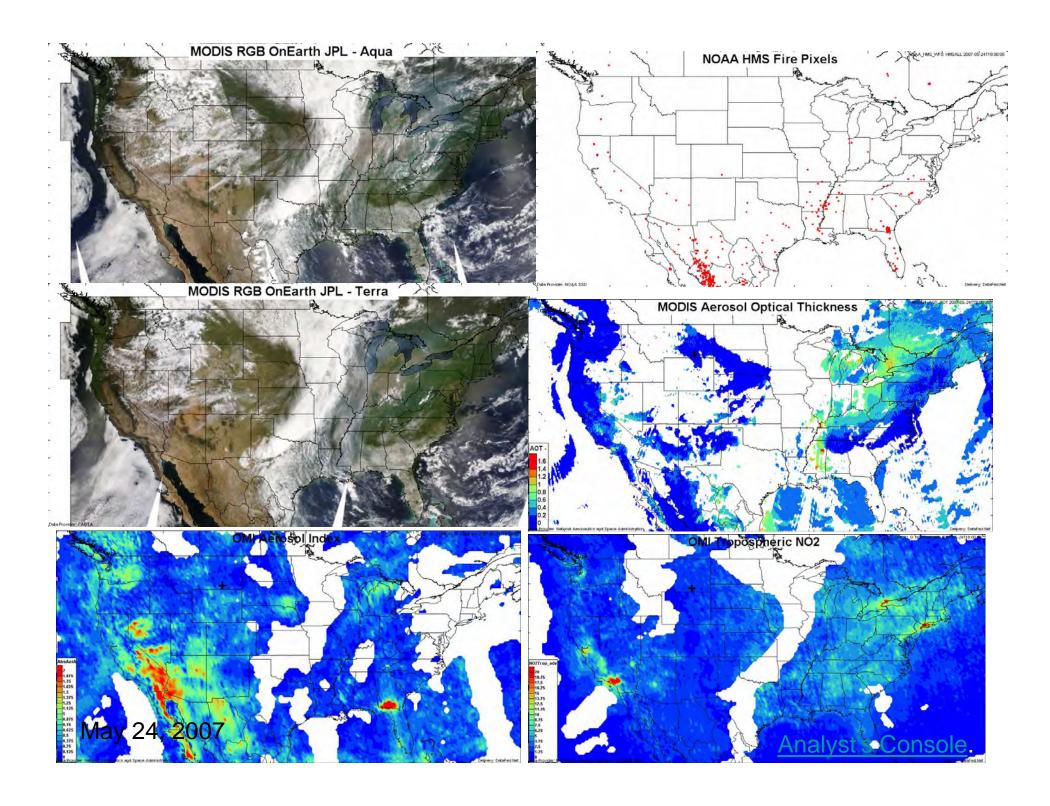
### **Analyst Console**

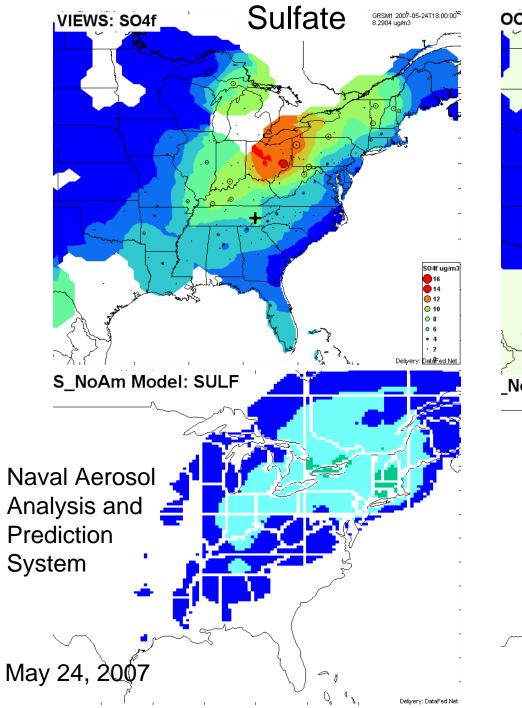
http://www.datafed.net/consoles/user\_consoles.asp?view\_states=ARC/FRMPM25\_Day\_map,ARC/MODIS\_map,ARC/MODIS\_Aqua\_ RGB\_OnEarthJPL\_map,ARC/OMI\_NO2Trop\_map,ARC/CATT\_FRMPM25\_Traj\_map,ARC/VIEWS\_SO4\_map,ARC/VIEWS\_OCfCombined\_map,ARC/NAAPS\_NoAm\_Sulf\_map,ARC/NAAPS\_NoAm\_Smok\_map,ARC/FRMPM25\_30DayMedian\_map,ARC/FRMPM2 5\_diff\_map&datetime=2007-05-24T18:00:00&Title=070524\_GA\_Smoke

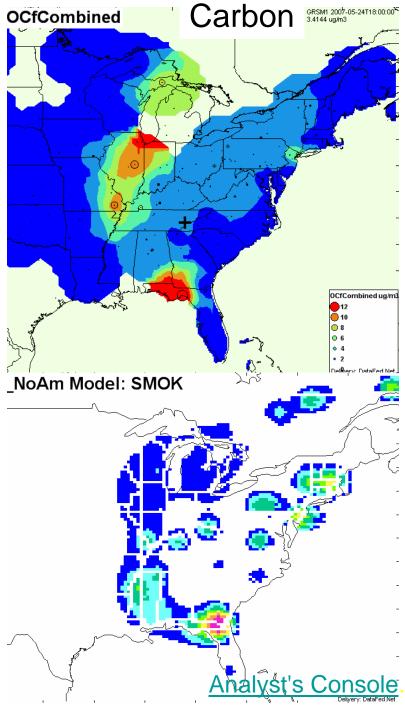
### FRM PM2.5

### AirNow PM2.5



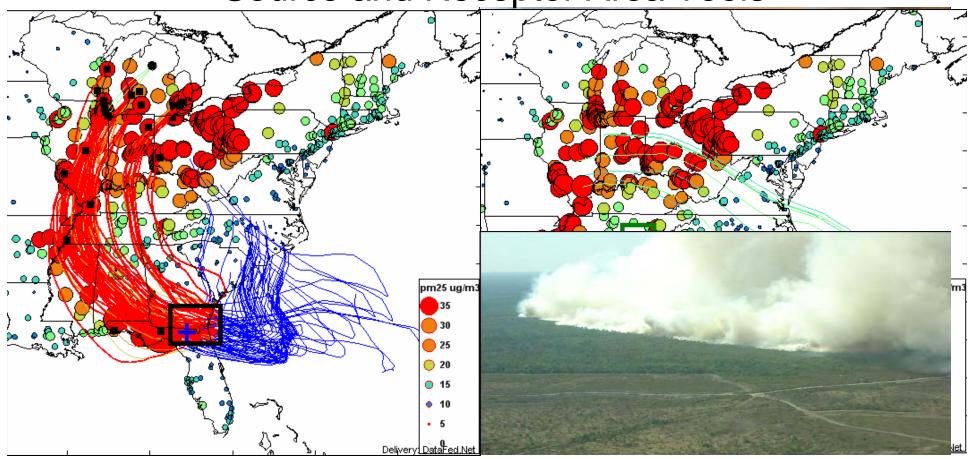






### To Describe Causal Connection (Transport)

Source and Receptor Area Tools

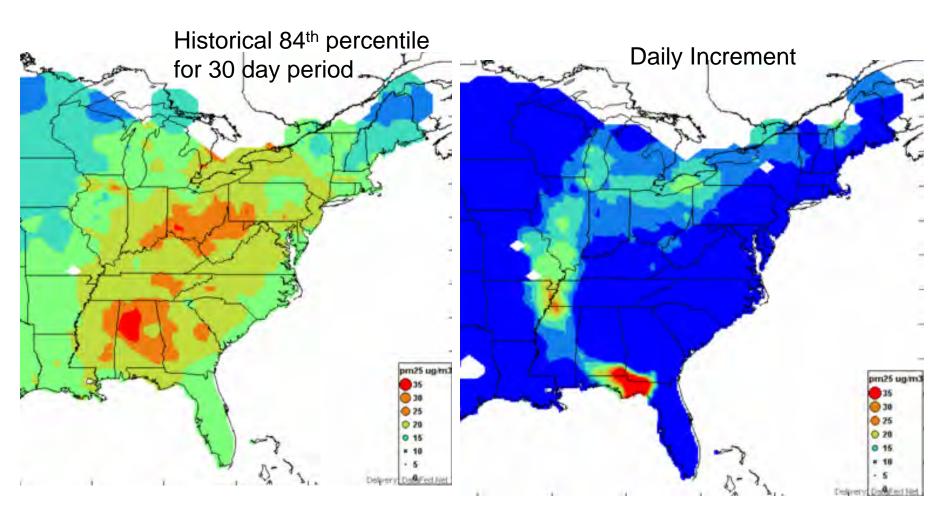


The user can move the rectangles

http://webapps.datafed.net/datafed.aspx?page=0705GAFire/CATT\_AQS\_D http://webapps.datafed.net/datafed.aspx?page=0705GAFire/CATT\_AQS\_D\_Rec

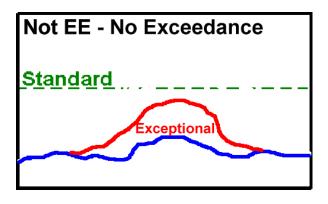
## To Compare with Historical Data

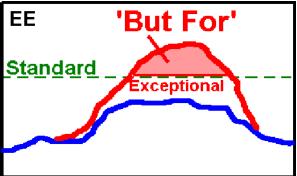
### **Concentration Anomaly Tool**



http://wiki.esipfed.org/index.php/Help:Using\_the\_Concentration\_Anomaly\_Tool

# The Analytical Challenge "but-for" evaluation







- •Only the red line is observable!
- •The blue line has to be inferred from other data:
  - Speciation
  - Continuous measurements
  - •Models?

