

Yakima Regional Clean Air Agency

Comments for the proposed SMP:

Yakima Regional Clean Air Agency (YRCAA) has at least the following comments:

1. YRCAA understand that DNR analyzed the effects on air quality on large burn 100 tons or more, however, approving the burn a day before the burn happen is completely erroneous approach. DNR and all weather forecaster will agree that weather conditions changes and could deteriorate very fast. YRCAA has long experience in the forecast and the actual knowledge of our area. Conditions changes overnight very rapidly. Yakima County had a very bad smoke intrusion. What will happen if the burn approval will be the on the day before the burning? The possibility and probability of intrusion and NAAQS exceedances will increase dramatically. YRCAA strongly believe the burn approval must be done on the same day of the burn NOT the DATE BEFORE. Please make this change to the SMP.

2. Enforcement Responsibility:

In case of smoke intrusions into cities and counties, will the DNR only be responsible for the enforcement? The State and the Local Clean Air Agencies must be involved in the enforcement when violations occur. Enforcement by education only, may not have the desired outcome. How often the DNR did issued civil penalties as part of enforcement in the past 10 or more years? If my understanding is correct, none. If that is true, why this plan will be followed or should be and even be effective, and what benefits it will add to the SIP.

3. Area and topographies should be part the burn procedure/protocol as it effects smoke transportation. Multiple day burns will definitely affect those low or valley areas overnight, especially during inversions. Yakima county is known for almost daily inversion due to difference in day and night temperature. It is a semi-arid region. Hence, burning calls for the the west side and the east side of the mountain should be differentiated in the SMP.

4. Smoke intrusion caused by silvicultural burning:

If the approval of burning will be done a day or two before the burning, it will be less of a possibility to know where the smoke intrusion will be not as what stated in the SMP, it will be known. Again, approving the burn one day before the burn must delated from the SMP, and replaced by approval on the same day of the burn.

5. "If DNR determines that a smoke intrusion has occurred... from SMP" a report will be generated after 10 business days. If no deterrent/enforcement, a report only will not prevent smoke intrusion now or in the future and will not be helpful for areas with maintenance plan or nonattainment.

6. If the NAAQS exceeded because of the burn, and EPA denies the exceptional event demonstration by DNR, who will be responsible for the nonattainment issues in that area, if the area become a nonattainment? Is it DNR, the Local Clean Air Agencies (LCAA) or the State?

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