

**SAN JOAQUIN VALLEY UNIFIED
AIR POLLUTION CONTROL DISTRICT**

COMPLIANCE MEMORANDUM

DATE: June 28, 2011

TO: Compliance Department Staff

FROM: Ryan Hayashi, Supervising Air Quality Specialist

SUBJECT: **Residual Approved Agricultural Burning**

The purpose of this memorandum is to provide guidance as to the proper procedures for handling burn requests to complete District approved agricultural burns on subsequent days.

Historically, the District has only authorized agricultural burning on a single day basis. Any disturbance of the materials on subsequent days was considered a new burn and therefore required a new burn authorization confirmation number. If there were no allocation allotted in the subject zone for that day, the permit holder would not be allowed to disturb the materials. In the majority of these cases, the purpose for disturbing the materials was to “push” in materials on the outskirts of the burn pile that did not previously ignite. The practice of churning the pile and adding unburned material reduces the amount of smoldering, resulting in a hotter and cleaner burn.

To address this issue, the District has developed the following procedures:

1. Permit holders wishing to complete authorized burn(s) on subsequent days are required to contact the District to request additional authorization on each day they wish to burn.
2. District staff must verify that the sole purpose of the request is to finish a previously authorized burn.
3. Once District staff verifies that the purpose is to finish an existing burn, they will ask the permit holder approximately how much material was left to be burned and then authorize the request through the Smoke Management System (SMS).
4. If the burn is approved, District staff will provide the permit holder with the new authorization confirmation number.

FYI-AGBURN-11.1

5. If there is partial allocation available for the burn request, District Staff will provide the permit holder with the confirmation number and will make a note in the SMS stating the District is allowing them to burn the entire residual amount they requested (This should be a rare occurrence).
6. If there is no allocation in the zone, District staff will advise the permit holder that their burn is authorized under the previous day's confirmation number and remind them that they cannot add any new materials that were not already part of the previous burn pile.
 - In these instances, staff will make an entry in the location of the requested burn in SMS, stating "The permit holder was given confirmation to continue burning the residual materials under confirmation # (previous confirmation #), given on (date confirmation was granted)".

Note: During fireplace curtailment season (November 1st through the end of February), the District does not give authorization for any agricultural burning in counties that are under a curtailment. In the aforementioned situation, the District will allow permit holders to complete already approved burns provided the steps listed above are followed.

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