

# News Release

For immediate release  
10-11-11



**Attn: Local news and assignment editors**

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## **Air District seeks exemption for ozone exceedances** *Lion Fire emissions affected ozone levels in Sequoia National Park*

Today, the Air District submitted a written petition to the federal Environmental Protection Agency (EPA) formally requesting that the agency not count ozone violations experienced last summer at two high-elevation monitors located in Sequoia-Kings Canyon National Park. The text of the District letter to EPA is attached. District officials contend that a significant wildfire in Sequoia National Forest this past summer resulted in abnormally elevated 8-hour ozone readings at the Ash Mountain and Lower Kaweah monitoring stations, which should not count against the Valley in demonstrating compliance with federal standards.

The District petition is filed under the federal law that provides for exclusion of violations that result from natural and exceptional events. The event in question is the Lion Fire in Sequoia National Forest that scorched nearly 20,500 acres in close vicinity of the monitoring stations.

Under federal guidelines, natural events are occurrences outside the control of air quality management agencies that result in exceedances above health-based standards. When this situation occurs, the air management agency may petition EPA to have these exceedances removed from consideration for attainment of the standard.

In 2011, there were 99 days during which the 8-hour ozone standard was exceeded somewhere in the Valley. Of this total, there were 16 days when the Ash Mountain and Lower Kaweah stations were the only places in the Valley that violated the standard.

“The natural events exclusion in federal law exists exactly for incidents such as this,” said Seyed Sadredin, the Air District’s executive director and air pollution control officer. “Valley residents and businesses should not be penalized for violations over which we have no control.”

The number of days when the 8-hour or 1-hour ozone standard were exceeded in 2011 in each of the 8 counties in San Joaquin Valley are as follows:

-more-

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	8-hour <u>Standard</u>	1-hour <u>Standard</u>
San Joaquin County:	8	0
Stanislaus County:	21	0
Merced County:	12	0
Madera County:	16	0
Fresno County:	62	3
Kings County:	28	0
Tulare County:	77 (93*)	0
Kern County:	61	0

\* If all exceedances in the national park are counted

District officials also note that the Ash Mountain and Lower Kaweah monitoring stations, located at the elevations of 1,800 feet and 6,400 feet, respectively, are secondary stations and should not be used for assessing air quality conditions on the Valley floor. Unlike other air monitoring stations in the Valley that were sited in strict adherence to federal laws to ensure collection of data that is representative of the quality of air breathed by Valley residents, these stations were sited and installed by the national park for the primary purpose of measuring pollution levels at the park, which are primarily impacted by wildfires.

"These monitoring stations were not designed to measure air quality in population centers in the Valley and should not be used by the federal government to assess the Valley's attainment of the ambient air quality standards," Sadredin said.

District officials also announced that in order to prevent confusion and to provide more precise information to the public, future air quality forecasts and reports will distinguish between air quality data from the Sequoia National Park and those for the Valley. Under the new system, air quality data for high elevations in the park will be based on readings from the Ash Mountain and Lower Kaweah monitoring stations, and the Valley monitors will be used to report air quality for population centers and rural areas on Valley floor.

The District will follow its petition to EPA with extensive documentation of air-quality data and the circumstances that led to the exceedances. Federal law requires that the District demonstrate through "reliable, accurate data that is promptly produced" that an exceptional event has occurred. The law also requires that the District establish "a clear causal relationship" between a measured exceedance and the exceptional event demonstrating "that the exceptional event caused a specific air pollution concentration at a particular location."

Preliminary data shows 16 days potentially affected by Lion Fire emissions. But despite the fire, the air basin has seen a significant reduction in 8-hour and 1-hour ozone exceedances. In fact, the last three years have had the lowest total number of exceedances for ozone. The past two summers have been some of the cleanest on record for the eight-county air basin.

"Outside of this wildfire, the air basin had another exceptionally clean summer, for which the Valley residents and businesses must be commended," said Sadredin. "Of course, despite significant progress, the Valley still has the second highest number of 8-hour ozone violations in the nation behind Southern California."



October 11, 2011

Mr. Jared Blumenfeld  
Regional Administrator  
U.S. EPA, Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

**Re: Exceptional Event Exclusion of Air Quality Measurements from Ash Mountain and Lower Kaweah Air Monitoring Stations During 2011 Lion Fire**

Dear Mr. Blumenfeld:

The San Joaquin Valley Air Pollution Control District (District) would like to notify the U.S. EPA (EPA) of the District's intent to flag certain ozone data measured at two air monitoring stations: Ash Mountain (06-107-0009) and Lower Kaweah (06-107-0006) operated by Sequoia National Park. There are 16 days that the District will be requesting be considered as Exceptional Events in order to ensure that these measurements are excluded from regulatory considerations, and the District will follow the appropriate federal procedures with which to file these events (see table at end of letter for specific dates and information).

Based on our initial evaluation, measured values in Tulare County, and in particular these stations, were significantly impacted by a large fire (the Lion Fire) burning in the vicinity of these stations, resulting in a number of exceedances of the federal 2008 eight-hour ozone standard. The Lion Fire was caused by a lightning strike on July 8, 2011 and burned in the backcountry of the Sequoia National Forest. Burning until mid-September, the fire consumed approximately 20,500 acres, resulting in a large release of emissions, with both referenced air monitoring stations located 17 to 18 miles from the nearest edge of the fire. These sites are in elevated terrain, with Ash Mountain located at about 1,800 feet and Lower Kaweah at about 6,400 feet. In fact, for the 16 days being flagged, the air monitoring sites in question were the only sites with ozone measurements over the federal 2008 eight-hour ozone standard in the San Joaquin Valley Air Basin. In addition to these days, there is the potential that eight-hour ozone exceedances on additional days in Tulare County were caused by the Lion Fire; however, the District will not be pursuing exclusion of these days as Exceptional Events at this time.

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

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Mr. Blumenfeld  
October 11, 2011

As the District continues to see improved air quality and decreased ozone measurements, it has become increasingly important to carefully consider the role of the Ash Mountain and Lower Kaweah monitoring stations. As stated earlier, these stations are located at high elevations, with Ash Mountain located at the ideal height for ozone mixing. Given their location and elevations, these sites are generally not representative of air quality within Tulare County of the San Joaquin Valley. In fact, to address this issue, the District intends on creating a new forecasting zone for eastern Tulare County in order to prevent confusion and to provide more precise information to the public. These new future air quality forecasts and reports will distinguish between air quality data from Sequoia National Park and those for the Valley. Under the new system, air quality data for high elevations in the park will be based on readings from the Ash Mountain and Lower Kaweah monitoring stations, and the Valley monitors will be used to report air quality for population centers and rural areas on the Valley floor.

Unlike the extensive air quality monitoring network installed and maintained by the District and state Air Resources Board (ARB), these monitoring stations were installed by the National Park Service as special-purpose monitors, and not in conformance with the siting requirements outlined under Title 40 Part 58, Subpart G. Therefore, it is our understanding that EPA has not used these air monitoring sites to determine attainment status. Rather, EPA uses data from these sites to determine or confirm non-attainment boundaries and for the secondary federal standards. Given the non-regulatory status of these monitoring sites, please advise if a mechanism other than the flagging and exclusion of these days through the Exceptional Event process is the appropriate vehicle to address this issue.

We look forward to your prompt feedback, and working with you and other agencies to properly evaluate this issue under the appropriate mechanism.

Sincerely,



Seyed Sadredin  
Executive Director/Air Pollution Control Officer

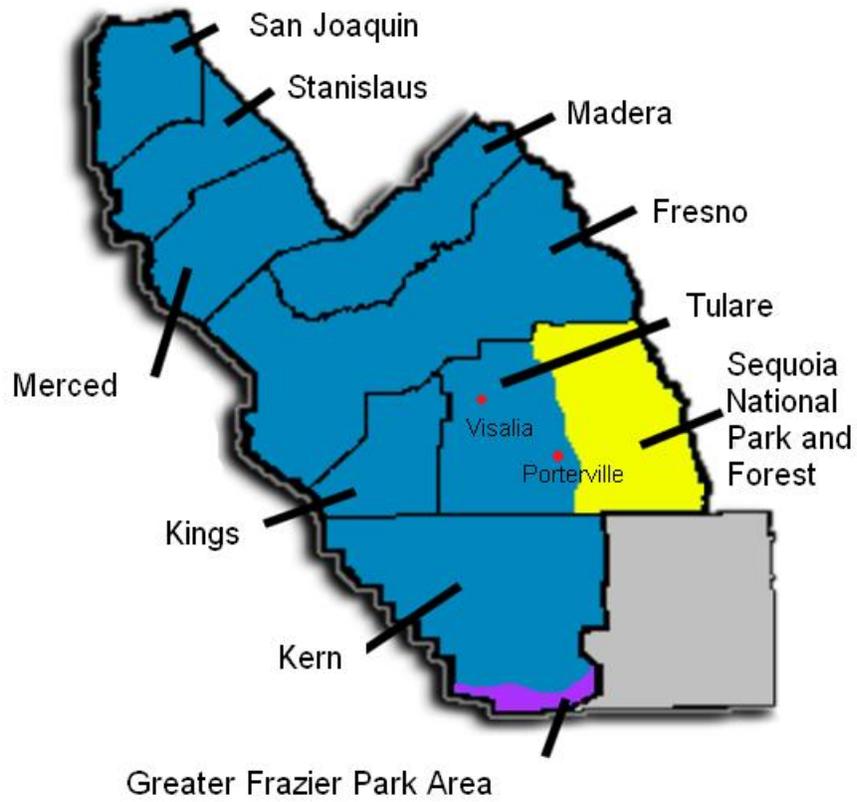
cc:

Lynn Terry, Air Resources Board  
Karen Taylor-Goodrich, Sequoia and Kings Canyon National Parks

Mr. Blumenfeld  
 October 11, 2011

**Exceptional Events Associated with 2011 Lion Fire**

Date	8-hr Ozone Exceedance at Ash Mt./Lower Kaweah (ppb)	SJV Air Basin High (not including Ash Mt./Lower Kaweah)	Site	Tulare County High (not including Ash Mt./Lower Kaweah)	Site
7/10	81	73	Edison	72	Porterville
7/11	78	66	Arvin DiGiorgio	61	Porterville
7/18	83	74	Porterville	74	Porterville
7/19	77	66	Porterville	66	Porterville
7/24	83	72	Clovis	72	Porterville
7/26	89	71	Parlier	66	Porterville
8/4	85	70	Arvin DiGiorgio, Edison	68	Porterville
8/5	86	68	Arvin DiGiorgio	65	Porterville
8/6	81	72	Clovis	72	Porterville
8/7	82	70	Porterville	70	Porterville
8/8	84	68	Clovis	67	Porterville
8/9	84	70	Porterville	70	Porterville
8/16	77	71	Parlier	68	Porterville
8/19	83	68	Maricopa	61	Porterville
8/20	78	67	Clovis	51	Porterville
8/22	86	74	Porterville	74	Porterville



The Valley Air District covers eight counties including San Joaquin, Stanislaus, Merced, Madera, Fresno, Kings, Tulare and the Valley air basin portion of Kern. Visit [www.valleyair.org](http://www.valleyair.org) to learn more.