



## **Verification of Continued Attainment in Limited Maintenance Areas (2024)**

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### **Air Quality Program**

Washington State Department of Ecology  
Olympia, Washington

June 2024, Publication 24-02-018

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### Related Information

2024 Ambient Air Monitoring Network Plan

Publication 24-02-018(hyperlink when published)<sup>1</sup>

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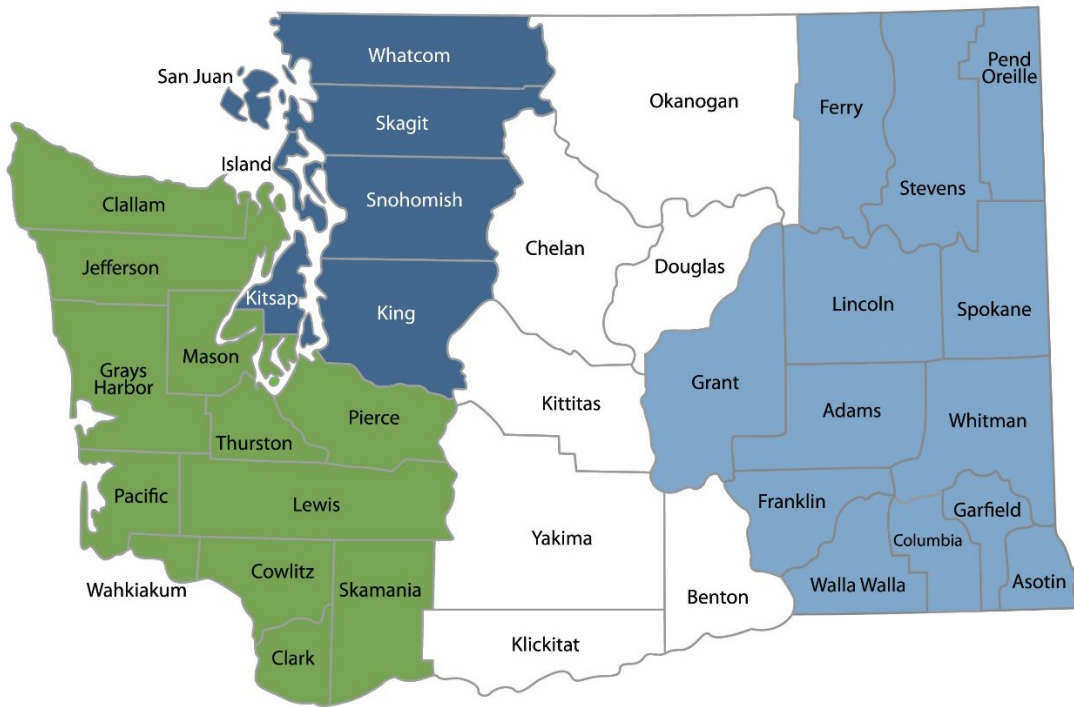
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<sup>1</sup> <https://fortress.wa.gov/ecy/publications/SummaryPages/2202013.html> (not yet available)

<sup>2</sup> [www.ecology.wa.gov/contact](http://www.ecology.wa.gov/contact)

# Department of Ecology's Regional Offices

## Map of Counties Served



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Region	Counties served	Mailing Address	Phone
<b>Southwest</b>	Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Mason, Lewis, Pacific, Pierce, Skamania, Thurston, Wahkiakum	P.O. Box 47775 Olympia, WA 98504	360-407-6300
<b>Northwest</b>	Island, King, Kitsap, San Juan, Skagit, Snohomish, Whatcom	P.O. Box 330316 Shoreline, WA 98133	206-594-0000
<b>Central</b>	Benton, Chelan, Douglas, Kittitas, Klickitat, Okanogan, Yakima	1250 West Alder Street Union Gap, WA 98903	509-575-2490
<b>Eastern</b>	Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Spokane, Stevens, Walla Walla, Whitman	4601 North Monroe Spokane, WA 99205	509-329-3400
<b>Headquarters</b>	Statewide	P.O. Box 46700 Olympia, WA 98504	360-407-6000

# Verification of Continued Attainment in Limited Maintenance Areas (2024)

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Washington State Department of Ecology  
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DEPARTMENT OF  
**ECOLOGY**  
State of Washington

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# Executive Summary

This document summarizes the calculations for verification of continued attainment of National Ambient Air Quality Standards (NAAQS) in Washington’s Limited Maintenance Areas.

## Maintenance Areas

Washington has five maintenance areas for criteria pollutants as of July 1, 2024. Only those areas that qualified for the Limited Maintenance Plan approach must submit verification documentation. These maintenance areas are marked with an (\*). Maintenance areas demonstrate continued attainment of the NAAQS either through monitoring or through EPA-approved alternate methods. These methods are summarized in Table 1.

Table 1. Current Washington maintenance areas and methods of demonstrating NAAQS attainment

Maintenance Area (Pollutant)	End of Maintenance Period	NAAQS Attainment Method
Wallula (PM <sub>10</sub> )	9/26/2025	Burbank-Maple St PM <sub>10</sub> monitor (530710006)
Spokane (PM <sub>10</sub> )*	8/30/2025	Spokane-Augusta PM <sub>10</sub> monitor (530630021) until March 2021; Spokane-E Broadway Ave PM <sub>10</sub> monitor (530630017) as of April 1, 2021
Yakima (PM <sub>10</sub> )	3/10/2025	Yakima-4 <sup>th</sup> Ave S PM <sub>10</sub> monitor (530770009)
Tacoma (PM <sub>2.5</sub> )	3/12/2035	Tacoma-L St PM <sub>2.5</sub> monitor (530530029)
Spokane (CO)*	8/30/2025	Modeled onroad, nonroad and residential wood combustion CO emissions

\* indicates Limited Maintenance Areas where submission of verification documentation is required.

## Spokane County PM<sub>10</sub> Maintenance Area

The design values for the Spokane County Maintenance Area are based on FEM PM<sub>10</sub> monitoring data from the Spokane-Augusta Ave (530630021) and Spokane Valley-E Broadway Ave (530630017) monitoring sites in Spokane, Washington. Spokane Valley-E Broadway Ave became the designated PM<sub>10</sub> monitor for the Spokane County PM<sub>10</sub> maintenance area on April 1, 2021. The PM<sub>10</sub> data from the Spokane-Augusta Ave and Spokane Valley-E Broadway Ave sites were combined for the purpose of National Ambient Air Quality Standard (NAAQS) compliance and limited maintenance plan (LMP) eligibility in this document.

In 2020, 2021, 2022, and 2023, the western United States and Canada experienced severe wildfire seasons, resulting in significant wildfire smoke impacts that caused:

- Eight PM<sub>10</sub> exceedances on September 12, 13, 14, 15, 16, and 18, 2020; and August 19 and 20, 2023. The exceedances affect the LMP design value and the NAAQS design value.
- Six elevated PM<sub>10</sub> concentrations: September 17, 2020; August 2, 12, and 13, 2021; and September 12 and 13, 2022. These concentrations are eligible for exclusion from LMP design value calculations following the guidance in the EPA memorandum “Additional Methods, Determinations, and Analyses to Modify Air Quality Data Beyond Exceptional Events.”<sup>3</sup>

Ecology placed informational flags (“i-flags”) in EPA’s Air Quality System (AQS) database on all hourly PM<sub>10</sub> concentrations on the days listed above. Documentation supporting the exclusion of these values as exceptional events is provided in the Ecology flagging memos “2020 Informational Flagging Request for Wildfire-Affected PM<sub>2.5</sub>, Wildfire- and High Wind-Affected PM<sub>10</sub>” and “Informational Flagging Request for Ozone, PM<sub>10</sub>, & PM<sub>2.5</sub> during 2023 fires”; and the SRCAA flagging memos dated February 2, 2022, and February 10, 2023, included in the Appendix of this document.

The LMP 5-year design value and NAAQS 3-year design value are shown with and without the Ecology i-flagged elevated PM<sub>10</sub> days.

### LMP Design Value

A 5-year PM<sub>10</sub> design value below 98 µg/m<sup>3</sup> demonstrates that the Spokane County Maintenance Area continues to qualify for the LMP approach. With the wildfire smoke exceedances and high concentration data removed, Spokane’s design value is eligible for the LMP option.

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<sup>3</sup> *Additional Methods, Determinations, and Analyses to Modify Air Quality Data Beyond Exceptional Events* [Memorandum]. Research Triangle Park, NC: Environmental Protection Agency. Retrieved from [https://www.epa.gov/sites/production/files/2019-04/documents/clarification\\_memo\\_on\\_data\\_modification\\_methods.pdf](https://www.epa.gov/sites/production/files/2019-04/documents/clarification_memo_on_data_modification_methods.pdf).



**Table 2. Spokane County Maintenance Area LMP Design Values**

	<b>2019-2023 LMP Design Value (DV)</b>
DV with i-flagged data	212 $\mu\text{g}/\text{m}^3$
DV without i-flagged data	87 $\mu\text{g}/\text{m}^3$

## **NAAQS Design Value**

A 3-year  $\text{PM}_{10}$  design value at or below 1.0 expected exceedances demonstrates compliance with the  $\text{PM}_{10}$  NAAQS. The design value is the expected number of annual 24-hour exceedances of  $150 \mu\text{g}/\text{m}^3$ , averaged over 3 years. The NAAQS design value is shown with and without the eight Ecology i-flagged  $\text{PM}_{10}$  exceedances.

**Table 3. Spokane County Maintenance Area NAAQS Design Values**

	<b>2021-2023 NAAQS Design Value (DV)</b>
DV with i-flagged data	0.7 expected exceedances
DV without i-flagged data	0.0 expected exceedances

The 2023 wildfire smoke impacts generated at total of two  $\text{PM}_{10}$  exceedances. There were no  $\text{PM}_{10}$  exceedances associated with wildfire smoke events in 2021 or 2022. The Spokane County  $\text{PM}_{10}$  contingency measures in the LMP are for road dust, windblown dust, and solid fuel burning devices. The contingency measures do not address wildfire air quality impacts; therefore they have not been implemented.

## **Spokane County CO Maintenance Area**

EPA approved an alternate method of verification of attainment of the CO NAAQS and qualification for the limited maintenance plan option under 40 CFR 58.14(C) (Federal Register # 81 FR 45417; July 14, 2016). Under this alternative, EPA considers the limited maintenance plan criteria met and continued verification of attainment of the CO NAAQS if the total of the three predominant CO emission source categories calculated as part of the triennial emissions inventory (onroad mobile, nonroad, and residential wood combustion) remain below the corresponding total of the 2002 emission inventory source categories approved at the time the Spokane-area was redesignated to attainment. SRCAA and Ecology will compare future year 2017, 2020 and 2023 triennial emission analysis results to the baseline 2002.

## **Verification of Attainment**

Total emissions for the 2020 evaluation year were compared to the 2002 attainment year emissions. The 2020 evaluation year was lower than the attainment year; therefore, the Spokane CO maintenance area continues to qualify for the limited maintenance plan option and continued verification of attainment of the CO NAAQS. SRCAA and Ecology's final analysis will be with the 2023 triennial emissions inventory.

**Table 4. Spokane CO maintenance area total emissions (tons per year)**

	<b>Onroad</b>	<b>Nonroad</b>	<b>Residential Wood Combustion</b>	<b>Total</b>
2002	48,878	23,795	7,199	80,872
2017	18,678	12,586	8,260	39,524
2020	23,123	14,554	9,030	46,708

## **Wallula PM<sub>10</sub> Maintenance Area**

The Wallula Maintenance Plan is not a Limited Maintenance Plan. Ecology submitted the Second Ten-Year Maintenance Plan for Particulate Matter (PM<sub>10</sub>) for Wallula to EPA November 22, 2019, which was approved on June 1, 2020. Continued attainment of the PM<sub>10</sub> standard is demonstrated by the Burbank-Maple Street monitor as of January 2018. Please see the 2024 Ambient Air Monitoring Network Plan for the Wallula Maintenance Area compliance status.

# Appendix A. Maintenance Plan and Flagging Correspondence

## SRCAA 2024 Design Value memo



1610 S. Technology Blvd., Suite 101  
Spokane, WA 99224  
SpokaneCleanAir.org

Date: March 5, 2024  
To: Jill Schulte, Beth Friedman, Sean Lundblad  
CC: Cooper Garbe, Caitlin Cannon, Scott Windsor, Mark Rowe  
From: Margee Chambers *Margee Chambers*  
Subject: Spokane County PM<sub>10</sub> and CO Design Values for the Ecology State Air Monitoring Network Report

### PM<sub>10</sub> Design Values

Included in this memo are the 5-year and 3-year design values for the PM<sub>10</sub> Spokane County Maintenance Area, in Spokane, Washington. The design values are based on FRM and FEM 24-hour PM<sub>10</sub> monitoring data from the Augusta Avenue site (530630021) and the Broadway Avenue site (530630017), which became the regulatory site in April 2021, replacing the August site, in Spokane, Washington. The PM<sub>10</sub> data for Augusta and Broadway will be merged and treated as a single site for the purpose of National Ambient Air Quality Standard (NAAQS) compliance and limited maintenance plan (LMP) eligibility.

The Western United States and Canada has been experiencing severe wildfire seasons, resulting in significant wildfire smoke impacts.

- Eight PM<sub>10</sub> exceedances on: September 12, 13, 14, 15, 16, and 18, 2020; and August 19 and 20, 2023. The exceedances affect the LMP design value and the NAAQS design value.
- Six PM<sub>10</sub> elevated concentrations: September 17, 2020; August 2, 12, and 13, 2021, and September 12 and 13, 2022, that are eligible for exclusion because they have regulatory significance for the area to meet the LMP design value.

### LMP Critical Design Value

A 5-year PM<sub>10</sub> critical design value below 98 µg/m<sup>3</sup> demonstrates that the Spokane County Maintenance Area continues to qualify for the LMP approach. The LMP critical design value is shown with and without the eight Ecology i-flagged PM<sub>10</sub> exceedance data and six PM<sub>10</sub> high concentration data from 2019-2023. With the wildfire smoke exceedances and high concentration data removed, Spokane's design value is eligible for the LMP option.

	2019-2023 LMP Design Value (DV)
DV with i-flagged data	212 µg/m <sup>3</sup>
DV without i-flagged data	87 µg/m <sup>3</sup>

### NAAQS Design Value

A 3-year PM<sub>10</sub> design value at or below 1.0 demonstrates compliance with the PM<sub>10</sub> NAAQS. The design value is the number of 24-hour exceedances of 150 µg/m<sup>3</sup>, averaged over three years. The NAAQS design value is shown

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with and without the two Ecology i-flagged PM<sub>10</sub> exceedance data from 2021-2023. Spokane’s design value is in-compliance.

	2021-2023 NAAQS Design Value (DV)
DV with i-flagged data	0.7
DV without i-flagged data	0.0

Please note that wildfire smoke impacts contributed to all of the PM<sub>10</sub> exceedances. The Spokane County PM<sub>10</sub> LMP contingency measures are for road dust, windblown dust, and solid fuel burning devices. The contingency measures do not address wildfire air quality impacts; therefore, the PM<sub>10</sub> contingency measures have not been implemented.

### CO Design Value

EPA approved an alternate method of verification of attainment of the CO NAAQS and qualification for the limited maintenance plan option under 40 CFR 58.14(C) (Federal Register # 81 FR 45417; July 14, 2016). Under this alternative, EPA considers the limited maintenance plan criteria met and continued verification of attainment of the CO NAAQS if the total of the three predominate CO emission source categories calculated as part of the triennial emissions inventory (onroad mobile, nonroad, and residential wood combustion) remain below the corresponding total of the 2002 emission inventory source categories approved at the time the Spokane-area was redesignated to attainment. SRCAA and Ecology will compare future year 2017, 2020 and 2023 triennial emission analysis results to the baseline 2002.

### Verification of Attainment

Total emissions for the 2020 evaluation year were compared to the 2002 attainment year emissions. The 2020 evaluation year was lower than the attainment year; therefore, the Spokane CO maintenance area continues to qualify for the limited maintenance plan option and continued verification of attainment of the CO NAAQS. SRCAA and Ecology’s final analysis will be with the 2023 triennial emissions inventory. As soon as the updated NEI is available, the comparison will be calculated and included in the annual design value memo.

Spokane County CO Emissions in Tons per Year				
Year	Onroad	Nonroad	Residential Wood Combustion	Total
2002	49,878 tons/yr	23,795 tons/yr	7,199 tons/yr	80,872 tons/yr
2017	18,678 tons/yr	12,586 tons/yr	8,260 tons/yr	39,524 tons/yr
2020	23,124 tons/yr	14,554 tons/yr	9,030 tons/yr	47,030 tons/yr

# Ecology 2024 flagging memo

## DEPARTMENT OF ECOLOGY Air Quality Program Flagging Memo

April 2024

TO: Scott Dubble, SWRO & Air Quality Operations Unit Supervisor  
FROM: Caitlin Cannon, Farren Thorpe, Sam Fox  
CC: Ecology: Martha Hankins, Jill Schulte, Melanie Forster, Sean Lundblad, Chris Atherly  
Northwest Clean Air Agency: Mark Buford  
Puget Sound Clean Air Agency: Kathy Strange  
Southwest Clean Air Agency: Uri Papish  
Spokane Regional Clean Air Agency: Scott Windsor, Margee Chambers  
Yakima Regional Clean Air Agency: Hasan Tahat  
Benton Clean Air Agency: Rob Rodger

SUBJECT: Informational Flagging Request for Ozone, PM10, & PM2.5 during 2023 fires.

The Exceptional Events Rule (EER) provides two data qualifier codes:

- Request Exclusion flags (R).
- Informational Only Flags (I).

Agencies use I-flags for informational data and R flags for data points intended for an Air Quality System (AQS) exclusion request. I-flags are initially used to identify values believed to have been affected by an event yet may not be ready for exceptional events demonstration or exclusion request.

The 2023 wildfire smoke season in Washington started early, due to a heat wave in May that affected the Pacific Northwest. Large multi-day wildfires didn't occur in Washington until July, but Canada had many large fires that started in May and burned for several months. The 2023 wildfire season had the most area burned in Canada's recorded history with more than 45 million acres burned, sending smoke to many parts of the USA. Although wildfire smoke was transported from Canada to Washington intermittently in the spring and early summer, most of the smoke was transported east of our state. It wasn't until mid-August that significant Canadian smoke influenced Washington State, which coincided with significant smoke impacts from Washington wildfires in the Cascades. Considerable wildfire smoke impacted most parts of the state from August 17 to August 22, followed by moderate smoke for several more days. A frontal system in late August produced rain and cooler weather, which mostly put an end to the wildfire season. There was also an industrial fire in Longview that sent smoke to Vancouver on July 18 and 19. See Table 1 for a list of 2023 wildfires that caused significant smoke impacts in Washington.

**Table 1: Wildfires in 2023 that contributed to smoke events at Washington compliance monitors.**

Name	Location	Discovery Date	Total Acres
Kookiji Creek Fire	Lytton, BC	July 8	44,590
Casper Creek Fire	Anderson Lake, BC	July 11	27,180
Adams Lake Complex	Adams Lake, BC	July 12	64,225
Downton Lake Fire	Mt. Penrose, BC	July 13	20,880
Ross Moore lake Fire	Ross Moore Lake, BC	July 21	23,304
Crater Creek Fire	Cathedral Provincial Park, BC	July 23	100,000+
Eagle Bluff Fire	Oroville, WA / Osoyoos, BC	July 29	16,428
McDougall Creek Fire	Kelowna, BC	August 15	33,883
Upper Park Rill Creek Fire	NE of Keremeos, BC	August 18	5,048
Flat Fire	Curry County, OR	July 15	34,242
Bedrock Fire	Lane County, OR	July 22	31,590
Lookout Fire	Lane County, OR	August 8	25,754
Camp Creek Fire	Clackamas County, OR	August 24	2,055
Airplane Lake Fire	Chelan County, WA	July 26	6,956
Sourdough Fire	Whatcom County, WA	August 1	7,377
Dome Peak Fire	Snohomish County, WA	August 9	1,477
Blue Lake Fire	Chelan County, WA	August 14	1,074
Gray Fire	Spokane County, WA	August 18	10,085
Oregon Road Fire	Spokane County, WA	August 18	10,817

**Sites, Dates, and Pollutants for 2023 I-Flags**

To meet the EER requirements, Ecology’s Air Quality Program Policy and Planning Section requests to place an I-flag on all data in AQS associated with the wildfire affected ozone, PM10, and PM2.5 exceedances during 2023. The requested locations and dates are provided as a separate attachment “Flag\_List.xlsx”, with criteria of having occurred between May 19 and September 18 with daily average concentrations of 15.0  $\mu\text{g}/\text{m}^3$  or greater for PM2.5, 98.0  $\mu\text{g}/\text{m}^3$  or greater for PM10, and 65 ppb for ozone. All data flagged show influence from USA wildfires (IT flag), Canadian wildfires (IF flag), or Industrial Accident (IC flag). Additional supporting information are included below, including satellite images, Washington Smoke Blog links, and media posts.

# SRCAA 2023 flagging memo



**Date:** February 10, 2023  
**To:** Caitlin Cannon, Jill Schulte, Beth Friedman  
**From:** Margee Chambers *Margee Chambers*  
**CC:** Ecology: Cooper Garbe  
Spokane Clean Air: Scott Windsor, Mark Rowe  
**Re:** Request for Exceptional Event Informational Flagging for:  
PM<sub>2.5</sub> exceedances, September 9 – 13, 2022 & October 19, 2022 (6 days)  
PM<sub>10</sub> elevated concentrations, September 12 – 13, 2022 (2 days)

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The U.S. Environmental Protection Agency’s (EPA) Exceptional Event Rule (EER) provides a process for excluding qualifying exceedances from calculations when determining compliance with National Ambient Air Quality Standards (NAAQS). The first step in the process is informational flagging of the data in the monitoring record and entering an event description.

The 2022 wildfire season impacted air quality throughout the western United States. The Spokane Regional Clean Air Agency (Spokane Clean Air) requests that the Washington State Department of Ecology (Ecology) place an informational flag on six PM<sub>2.5</sub> exceedances and two PM<sub>10</sub> elevated concentrations recorded at the Spokane - Broadway Avenue monitoring site as exceptional events and enter a description into the EPA Air Quality System (AQS). EPA’s Harnett memo states agencies can exclude PM<sub>10</sub> concentrations between 98-155 µg/m<sup>3</sup> threshold in determining eligibility for the PM<sub>10</sub> LMP option.

#### Exceedances of the 24-hour PM<sub>2.5</sub> standard:

Spokane – Broadway Avenue Site (AQS# 530630017)

Flagging description: The September exceedances occurred during a period of severe wildfire smoke impacts, where winds transported smoke from wildfires in California, Oregon and Washington into Spokane County’s airshed building PM<sub>2.5</sub> and PM<sub>10</sub> concentrations and then winds shifted bringing smoke from Idaho and Montana, combined with poor ventilation and nightly inversions trapped the wildfire smoke in the airshed. The October exceedance occurred when smoke from wildfires in Montana and Idaho drifted into the Spokane airshed and poor ventilation and nightly inversions combined with wildfire smoke increased PM<sub>2.5</sub> levels in the region.

- 9/9/2022: 41.3 µg/m<sup>3</sup>
- 9/10/2022: 44.0 µg/m<sup>3</sup>
- 9/11/2022: 68.8 µg/m<sup>3</sup>
- 9/12/2022: 103.5 µg/m<sup>3</sup>
- 9/13/2022: 63.2 µg/m<sup>3</sup>
- 10/19/2022: 37.9 µg/m<sup>3</sup>

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#### Elevated 24-hour PM<sub>10</sub> concentrations:

Spokane – Broadway Avenue Site (AQS# 530630017)

Flagging description: Preliminary data shows that the September exceedances occurred during a period of severe wildfire smoke impacts, where initially winds transported smoke from wildfires in California, Oregon and Washington into Spokane County's airshed, then winds shifted and brought smoke from Idaho and Montana wildfires, and a high pressure system trapped the smoke in the region, affecting PM<sub>2.5</sub> and PM<sub>10</sub> concentrations.

- 09/12/2022: 141.5 µg/m<sup>3</sup>
- 09/13/2022: 99.7 µg/m<sup>3</sup>

#### Supporting information:

Spokane Clean Air pulled together supporting information (Attachment A) about the wildfire smoke events.

- Spokane Regional Clean Air Agency Augusta air quality monitor graphs and communication / outreach
- Air Quality Alerts and National Weather Service forecasts
- AirNow AQI map and smoke map
- GOES West and NASA World View satellite images
- Cliff Mass Wx and WA Smoke Blogs



# SRCAA 2022 flagging memo



**Date:** February 2, 2022  
**To:** Jacob Berkey, Jill Schulte, Beth Friedman  
**From:** Margee Chambers *Margee Chambers*  
**CC:** Ecology: Jason Albrecht  
Spokane Clean Air: Scott Windsor, Mark Rowe  
**Re:** Request for Exceptional Event informational flagging for:  
PM<sub>2.5</sub> exceedances July 31 and August 1, 2, 3, 12, 13, and 14, 2021 (7 days)  
Ozone exceedances July 13, 14 and 31, 2021 (3 days)  
Elevated PM<sub>10</sub> concentrations August 2, 12, and 13, 2021 (3 days)

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EPA's Exceptional Event Rule (EER) provides a process for excluding qualifying exceedances from calculations when determining compliance with National Ambient Air Quality Standards (NAAQS). The first step in the process is informational flagging of the data in the monitoring record and entering an event description.

Spokane Regional Clean Air Agency (Spokane Clean Air) requests that the Washington State Department of Ecology (Ecology) place an informational flag on elevated PM<sub>2.5</sub>, PM<sub>10</sub> and Ozone concentrations recorded at the Spokane - Broadway Avenue, Greenbluff, and Turnbull monitoring sites as exceptional events and enter a description into the U.S. Environmental Protection Agency's (EPA) Air Quality System (AQS).

The elevated concentrations occurred during a period of severe wildfire smoke impacts, where winds transported smoke from regional wildfires in California, Oregon, and Washington.

#### Exceedances of the 24-hour PM<sub>2.5</sub> standard:

Spokane – Broadway Avenue Site (AQS# 530630017) Please note that Broadway became a regulatory monitoring site for PM<sub>2.5</sub> on January 1, 2021. The Augusta site is no longer the regulatory monitoring site.

- 7/31/2021: 53.6 µg m<sup>-3</sup>
- 8/1/2021: 57.6 µg m<sup>-3</sup>
- 8/2/2021: 96.4 µg m<sup>-3</sup>
- 8/3/2021: 72.7 µg m<sup>-3</sup>
- 8/12/2021: 78.9 µg m<sup>-3</sup>
- 8/13/2021: 117.7 µg m<sup>-3</sup>
- 8/14/2021: 67.7 µg m<sup>-3</sup>

**Exceedances of the 8-hour Ozone standard:**

Spokane – Greenbluff Site (AQS# 530630046)

- 7/13/2021: 76 ppb
- 7/14/2021: 73 ppb

Spokane – Turnbull Site (AQS# 530630001)

- 7/31/21: 71 ppb

Spokane Clean Air requests that Ecology i-flag concentration data believed to have been significantly affected by the 2021 wildfire smoke exceptional events, but not exceeding the standard. EPAs [Harnett memo](#) states agencies can exclude PM<sub>10</sub> concentrations between 98-155 µg/m<sup>3</sup> threshold in determining eligibility for the PM<sub>10</sub> LMP option.

**Elevated 24-hour PM<sub>10</sub> concentrations:**

Spokane – Broadway Avenue Site (AQS# 530630017) Please note that Broadway became a regulatory monitoring site for PM<sub>10</sub> on April 1, 2021. The Augusta site is no longer the regulatory monitoring site.

- 8/2/2021: 112.7 µg m-3
- 8/12/2021: 100.6 µg m-3
- 8/13/2021: 144.6 µg m-3

**Flagging Request:** Please place exceptional event informational flags on July 31, August 1, 2, 3, 12, 13,14, 2021 at the Spokane - Broadway Avenue PM<sub>2.5</sub> site (AQS site ID #530630017); on July 13, 14, 2021 at the Spokane-Greenbluff site, (AQS site ID #530630046); on July 31, 2021 at the Spokane – Turnbull site (AQS site ID #530630001); and on August 2, 12, 13, 2021 for the Spokane – Broadway PM<sub>10</sub> site (AQS site ID #530630017). Please use the code “I-Informational” and enter the event description shown below:

Preliminary review of data suggests that regional wildfires in CA, OR, and WA, winds transporting smoke into Spokane County air shed, contributed to elevated levels of PM<sub>2.5</sub>, PM<sub>10</sub>, and ozone concentrations in Spokane County.

Spokane Clean Air pulled together supporting information (Attachment A) about the wildfire smoke events that is available upon request.

- Air Quality Alerts and National Weather Service forecasts
- Spokane Regional Clean Air Agency Augusta air quality monitor graphs and communication / outreach
- Airnow AQI map and smoke map
- GOES West and NASA World View satellite images
- Cliff Mass Wx Blogs

# Ecology 2021 flagging memo

## DEPARTMENT OF ECOLOGY Air Quality Program

May 7, 2021

TO: Beth Friedman

FROM: Jacob Berkey

CC: Ecology: Martha Hankins, Jason Alberich, Laurie Hulse-Moyer, Farren Herron-Thorpe, Jill Schulte and Melanie Forster  
Benton Clean Air Agency: Robin Priddy  
Northwest Clean Air Agency: Agata McIntyre, Lyn Tober  
Olympic Regional Clean Air Agency: Allie Feldt  
Puget Sound Clean Air Agency: Kathy Strange, Betsy Wheelock  
Southwest Clean Air Agency: Crystal Moore  
Spokane Clean Air Agency: Margee Chambers  
Yakima Clean Air Agency: Keith Hurley and Hasan Tahat

**SUBJECT: 2020 Informational flagging request for Wildfire affected PM2.5, Wildfire and high wind affected PM 10.**

The Exceptional Event Rule (EER) provides two data qualifier codes:

- Request Exclusion flags (R).
- Informational Only Flags (I).

Agencies use I flags for informational data and R flags for data points intended for an Air Quality System (AQS) exclusion request. I flags are initially used to identify values believed to have been affected by an event, yet may not be ready for exceptional events demonstration or exclusion request.

During September 7 through 19 2020, the State of Washington experienced significant wildfire smoke events, which blanketed the state and resulted in exceedances of PM2.5 and PM10. The contributing wildfires were in California, and Oregon, with additional wildfires burning here in Washington. Yakima County experienced additional wildfire smoke impact from September 2 through September 4.

For more information about these events, see the Washington State Smoke Blog:

<https://wasmoke.blogspot.com/2020/09/smoky-siege-look-back-at-smoke-storm-of.html>

Kennewick experienced three days in October related to high-wind dust. These occurred on October 16, 18, and 30, 2020. Our monitoring data at Kennewick shows these events. Here are the recorded maximum wind speeds for those dates:

10/16/2020: 32.1 mph

10/18/2020: 36.9 mph

10/30/2020: 31.1 mph

- This link from Department of Ecology shows our outreach efforts in regards to the wind event: <https://twitter.com/ecyspokane/status/1322295179928170496>
- This link is outreach from the National Weather Service regarding the event: <https://twitter.com/NWSPendleton/status/1322124202246361090>
- To track daily conditions during the time of the wind event check here: <http://mesonet.agron.iastate.edu/wx/afos/list.phtml?source=OTX&year=2020&month=10&day=7&drange=yes&year2=2020&month2=10&day2=23&view=prod&order=asc>
  - October 16: <http://mesonet.agron.iastate.edu/wx/afos/p.php?pil=AFDOTX&e=202010162318>
  - October 18: <http://mesonet.agron.iastate.edu/wx/afos/p.php?pil=AFDOTX&e=202010180505>
  - October 30: <http://mesonet.agron.iastate.edu/wx/afos/p.php?pil=AFDOTX&e=202010301805>

To meet the EER requirements, Ecology's Air Quality Program Policy and Planning Section requests you to place an I flag on all data in AQS associated with the wildfire and high wind affected PM2.5 and PM10 data during 2020.