

# Appendix I. Public Process Documents

## Contents

Announcing Informational Webinar/Preview period.....	I-2
Email Notice for Webinar to Agricultural Orgs/Interested Parties, July 31, 2015 .....	I-2
Distribution List of Organizations .....	I-2
Rules and SIP Listserv Message, July 30, 2015 .....	I-5
Website, Announcing preview opportunity, webinar .....	I-6
Ecology Blog, August 10, 2015.....	I-7
Exceptional Event Webinar, August 13, 2015.....	I-10
Webinar link.....	I-10
Webinar slides, notes .....	I-10
Announcing comment period.....	I-35
Email Notice to Comment to Agricultural Groups/ Interested Parties, September 4, 2015.....	I-35
Public Involvement Calendar notice .....	I-36
Benton Clean Air Agency website, September 3, 2015.....	I-37
Legal notice, Tri-City Herald, September 3, 2015.....	I-38
Washington Department of Agriculture Facebook, September 22, 2015 .....	I-39
News Release, Ecology, September 3, 2015.....	I-40
Media Coverage.....	I-42
Capital Press, September 7, 2015.....	I-42
iFIBER One News, September 8, 2015 .....	I-44
Tri-City Herald, September 3, 2015.....	I-45
Washington Agricultural Radio Network Interview, September 18, 2015.....	I-47

# Announcing Informational Webinar/Preview period

Email Notice for Webinar to Agricultural Orgs/Interested Parties, July 31, 2015

**From:** Hulse-Moyer, Laurie (ECY)  
**To:** [Alex Zimmerman \(azim07@comcast.net\)](mailto:Alex.Zimmerman@comcast.net); [jhutchinson@wspha.org](mailto:jhutchinson@wspha.org); [Jordan.Maley@oregonstate.edu](mailto:Jordan.Maley@oregonstate.edu); [mary\\_corp@oregonstate.edu](mailto:mary_corp@oregonstate.edu); [Sandy.Mcnab@oregonstate.edu](mailto:Sandy.Mcnab@oregonstate.edu); [info@earthshare.org](mailto:info@earthshare.org); [e3info@e3washington.org](mailto:e3info@e3washington.org); [justice@ccei.org](mailto:justice@ccei.org); [emcwayne@nweec.org](mailto:emcwayne@nweec.org)  
**Subject:** Join Ecology on August 13, 2015 for an Air Quality "Exceptional Events Webinar"  
**Date:** Friday, July 31, 2015 4:08:00 PM

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Greetings!

You're receiving this invitation because your organization may have an interest in agriculture activities on the Columbia Plateau that can have an effect on air quality. **The Department of Ecology will hold an informational webinar about Air Quality "Exceptional Events" on August 13, 2015 at 1:30pm.**

[Read the report or find out how to join the webinar](#)

## Background

Three thunderstorms in the fall of 2013 caused windblown dust and raised levels of particulate matter over the federal air quality standard at Kennewick. Ecology documented these events in an "Exceptional Event Demonstration" and will ask for Environmental Protection Agency's agreement that the values were caused by natural events and shouldn't count against the area.

## What comes next?

**Feedback:** We'll take feedback from now until August 21. Send your feedback or questions to me.

**Formal Comment Period:** A formal comment period will be held later this year, likely in September. We will take formal comments on the draft report at that time. We'll send you another notice when the official comment period opens.

Thank you. Hope you'll join us for the webinar!

[Laurie Hulse-Moyer / Air Quality Planner / WA State Department of Ecology / lahu461@ecy.wa.gov](mailto:lahu461@ecy.wa.gov) / (360) 407-6783

## Distribution List of Organizations

Far West Agribusiness Association  
Pacific Northwest Vegetable Association  
Washington Association of Wheat Growers  
Washington Association of Wine Grape Growers  
Washington Farm Bureau  
Washington State Crop Improvement Association  
Washington State Hay Growers Association  
Washington State Horticultural Association

Washington State Tree Fruit Association

Washington State Potato Commission

Washington Beef Association

Washington Cattlemen's Association

**Environment**

Audubon Washington

Climate Solutions

Columbia Basin Development League

Columbia-Pacific Resource Conservation and Development Council

Community Coalition for Environmental Justice

Earthcorps

Earthshare of Washington

Environmental Education Association of Washington

Friends of the Trail

Futurewise

Green Strategies

Heart of America Northwest

International Erosion Control Association - PNW Chapter

Izaak Walton League of American, Greater Seattle Chapter

Nature Conservancy – Washington Chapter

North Cascades Conservation Council

(Northwest Environment Watch) Sightline Institute

Northwest Environmental Business Council

Northwest Environmental Education Council

Northwest Intentional Communities Association (NICA)

Sierra Club Washington State Chapter

Society for Ecological Restoration (NW Chapter)

Washington Association of Conservation Districts

(Washington Citizens for Resource Conservation) Zero Waste Washington

Washington Conservation Voters

Washington Environmental Council

Washington State Conservation Commission

Washington State Environmental Health Association

**Government & Politics**

Association of Washington Cities

Asthma and Allergy Foundation of America - Washington State Chapter  
Respiratory Care Society of Washington  
Washington Association of County Officials  
Washington Research Council  
Washington State Association of Counties  
Washington State Grange  
Washington State Hospital Association  
Washington State Medical Association  
Washington State Public Health Association

**Benton County Commissioners**

Jerome Delvin  
Shon Small  
James R. Beaver

**Franklin County Commissioners**

Brad Peck  
Rick Miller  
Robert E. Koch  
copy Adam Fyall

**Oregon State-added corrected email**

Jordan Maley  
Mary Corp  
Sandy Macnab

## Rules and SIP Listserv Message, July 30, 2015

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The Department of Ecology invites you to attend an informational webinar on August 13.

Ecology will present on a technical report, called an "Exceptional Event" demonstration. The report is for three windblown dust events that caused the federal 24-hour PM<sub>10</sub> air quality standard to be exceeded at Kennewick in 2013. See [Ecology's webpage](#) to read the report and find out how to call in for the webinar.

Ecology determined that the exceedances were "Exceptional Events" caused by high winds. The winds overwhelmed dust prevention measures for agricultural lands.

Ecology will ask for EPA's agreement that the exceedances were caused by natural events and shouldn't count towards a federal air quality violation for the area. Ecology will hold a formal public comment period later this year. Questions? Contact [Laurie Hulse-Moyer](#).

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To unsubscribe from the ECY-AQ-RULE-AND-SIP-UPDATES list, click the following link:  
<http://listserv.wa.gov/cgi-bin/wa?SUBED1=ECY-AQ-RULE-AND-SIP-UPDATES&A=1>

# Website, Announcing preview opportunity, webinar

Ecology's Outdoor Dust page, August 28, 2015

<[http://www.ecy.wa.gov/programs/air/other/Windblown\\_dust\\_information.htm](http://www.ecy.wa.gov/programs/air/other/Windblown_dust_information.htm)>

Windblown & Construction Dust Information

The screenshot shows the Washington State Department of Ecology website. The header includes the Ecology logo and navigation links for Home, WATER, AIR, WASTE, CLEANUP, TOXIC HAZARDS, and GREEN. A search bar is in the top right. The main content area is titled "Air Quality" and features a sidebar with "AIR QUALITY" links such as Motor Vehicles, Agricultural Burning, and Air Monitoring. The main content includes a breadcrumb trail, a section for "Outdoor Dust" with sub-sections for Health & Dust, Dust Management, Exceptional Events, and Other Information. A text block explains that outdoor dust is a significant problem in Eastern Washington, especially during dry weather. Below this is a "Current News and Information" section with two columns: "Preview the Draft Exceptional Event Report" and "Attend Exceptional Event Webinar". The report preview includes a list of appendices (A through J) and a link to frequently asked questions. The webinar announcement states it will be held on August 13, 2015, at 1:30 pm. A "2015 Forecast" section notes that dust storms and wildfires are expected due to drought conditions. The "Your Health and Dust" section explains that dust is made of tiny particles and lists health effects like lung irritation, emphysema, asthma, bronchitis, cancer, heart disease, and allergic reactions. It also identifies high-risk groups (infants, elderly, pregnant women, people with respiratory conditions, and people with heart disease) and provides advice on how to protect oneself and others by avoiding going outside when there is a lot of dust in the air.

[http://www.ecy.wa.gov/programs/air/other/Windblown\\_dust\\_information.htm](http://www.ecy.wa.gov/programs/air/other/Windblown_dust_information.htm) [8/28/2015 11:04:14 AM]

Monday, August 10, 2015

## Eastern Washington dust storms trigger report to EPA

By Camille St. Onge, Communications Manager



September 15, 2013. Photo by Heather Wegant, [NBCRightNow.com](http://NBCRightNow.com)

In dry areas like Eastern Washington, dust is a significant air pollution problem. If you live in Eastern Washington, you have probably experienced the large desert-style dust storms known as haboobs.

From spring through fall, high winds in the Columbia Plateau region can combine with dry weather conditions to form strong winds that sweep up dust from farm fields and produce fierce dust storms. These dust storms can lead to extremely high levels of particle air pollution.

While dust storms are not uncommon in Eastern Washington, they sometimes are so extreme that they cause local air quality measurements to exceed federal air quality standards.

### Three unusual thunderstorms

That's what happened in 2013, when three unusual storms created strong winds and dust in Eastern Washington. The storms overwhelmed agriculture erosion controls and caused air pollution from dust to exceed federal air quality standards. [Ecology has developed a report](#) about the storms which we will soon submit to the U.S. Environmental Protection Agency. The report demonstrates that these three strong wind storms were exceptional events and concludes they were:

- Caused by nature.
- The cause of the high levels of particle pollution.
- Powerful enough to overwhelm the USDA-National Resource Conservation Service dust control measures in place throughout the area.



An exceptional event is an unusual or naturally-occurring event that can affect air quality, but cannot be reasonably controlled. If a storm causes air quality monitor readings to go over the federal limit and EPA agrees the reading was beyond our control and meets other required criteria, the high reading may be considered an exceptional event. The high reading then would not count when determining whether an area meets the National Ambient Air Quality Standards.

Ecology will ask the EPA to exclude the high level of particle pollution recorded during these strong wind storms from calculations used to determine whether the region meets the National Air Quality Standards. Excluding the high readings ensures the affected communities do not suffer significant impacts from an event that was beyond their control. Potentially, exceeding the air quality standards could impact transportation planning, business permitting and federal highway funding.

### [Attend exceptional dust event webinar](#)

If you're interested in learning more about Ecology's report to the EPA, it's easy to get involved. Ecology is hosting a [webinar](#) at 1:30 p.m. Thursday, Aug. 13 to go over the report being submitted to the EPA.



To learn more about exceptional event dust storms [read our FAQ](#) or visit Ecology's [Outdoor Dust web page](#).

Posted by Camille St. Ongeat [3:22 PM](#)

[Email This](#) [Blog This!](#) [Share to Twitter](#) [Share to Facebook](#) [Share to Pinterest](#)

Labels: [dust storm](#), [haboob](#), [Washington dust storms](#)

**No comments:**

[Post a Comment](#)

# Exceptional Event Webinar, August 13, 2015

## Webinar link

Link to webinar is posted at [Ecology's Outdoor Dust page](#).

<[http://www.ecy.wa.gov/programs/air/other/Windblown\\_dust\\_information.htm](http://www.ecy.wa.gov/programs/air/other/Windblown_dust_information.htm)>

## Webinar slides, notes

### Slide 1

### Exceptional Event Webinar will begin soon

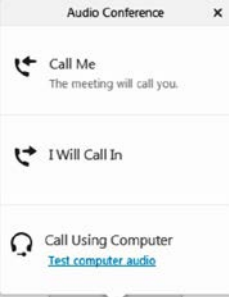
**Connecting to Audio: 3 Options**

**Phone (best sound quality)**

1. Select "Call Me"
  - o Enter your phone number
  - o You will be called
2. Or select "I Will Call In" and dial the number provided

**Computer microphone and speakers**

3. Select "Call Using Computer" and follow directions




### Slide 2

## Exceptional Event Demonstration

Laurie Hulse-Moyer  
Air Quality Program

**Our Mission:**

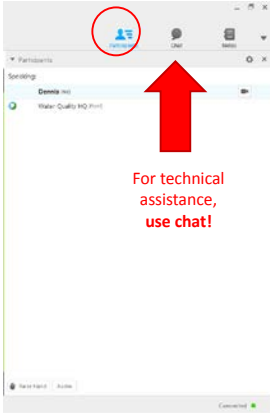
Protect, preserve and enhance Washington's environment for current and future generations.




Slide 3

### Exceptional Event Demonstration

The webinar is starting – you should be able to hear us now!



For technical assistance, use chat!




3

Slide 4

### Webinar Instructions for Presentation and Public Hearing

- **You should be able to hear us now!**
- **This meeting/webinar is being recorded**
- During **Presentation**, your phone will be muted by Ecology



4



Exceptional Event Demonstration

Laurie Hulse-Moyer  
Air Quality Planner, Air Quality Program



DEPARTMENT OF  
**ECOLOGY**  
State of Washington

Thank you for joining us today.


Introductions.

Who's in the room?


How many on the line?

### Why are we here today?

- Three strong wind storms in Fall 2013 caused exceedances of AQ Standards
- Ecology asking EPA to classify these as "exceptional events"



The image shows a clipping from the Tri-City Herald newspaper. The masthead reads "Tri-City Herald" with "VOICE OF THE MID-COLUMBIA" above it. The date is "SUNDAY" and "November 3, 2013". The main headline is "Wind whips Mid-Columbia" with a sub-headline "School damaged, many trees down as blustery conditions strike region". There is a photograph of a damaged school building. Other headlines include "TIGHY ONFAER FROOD" and "TIMBERS TOP SOUNDERS IN MLS PLAYOFF WIN".



6

Good afternoon and welcome!

You might be wondering why I invited you to this webinar. We're here today because on three different days in the fall of 2013, thunderstorms created high speed winds and caused the monitor in Kennewick to exceed a federal air quality standard.

So the exceedances don't count against Kennewick, we must document these events and ask for EPA's agreement that the high monitored values were caused by natural events and qualify as 'exceptional events'.

Since dust from agricultural lands figured prominently in the report, (was the biggest source of the dust), we wanted you to have a chance to preview the report before it goes out for public comment.

Maybe some of you remember the fall of 2013. The most memorable of the three storms was September 15, when a haboob formed and traveled up the whole Columbia Plateau.

The Tri City Herald article on the slide is for the November 2 event.

## What is an Exceptional Event?

*Unusual* events including *high winds*,  
fires, and construction that,  
*in certain cases*,  
can be *excluded from calculations*  
related to the NAAQS.

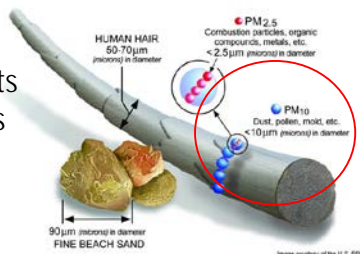


### So, just what is an Exceptional Event?

**EPA defines Exceptional events as unusual events including high winds, fires, and construction that, in certain cases, can be excluded from calculations related to the National Ambient Air Quality Standards (NAAQS).**

### What are NAAQS? What is the standard?

- What are NAAQS?
  - 6 main pollutants
  - PM<sub>10</sub> or particles w/diameter ten microns or less
- What is the PM<sub>10</sub> Standard?
  - 150 µg/m<sup>3</sup>\*



The diagram illustrates the relative sizes of various particles. A human hair is shown with a diameter of 60-70 microns. Fine beach sand is shown with a diameter of 90 microns. PM<sub>2.5</sub> particles are shown as small red dots with a diameter of less than 2.5 microns. PM<sub>10</sub> particles are shown as small blue dots with a diameter of less than 10 microns. A red circle highlights the PM<sub>2.5</sub> and PM<sub>10</sub> particles, showing they are significantly smaller than the human hair and beach sand.

\* Not to be exceeded more than three times over three years

So, what are NAAQS and which air quality standard was exceeded?

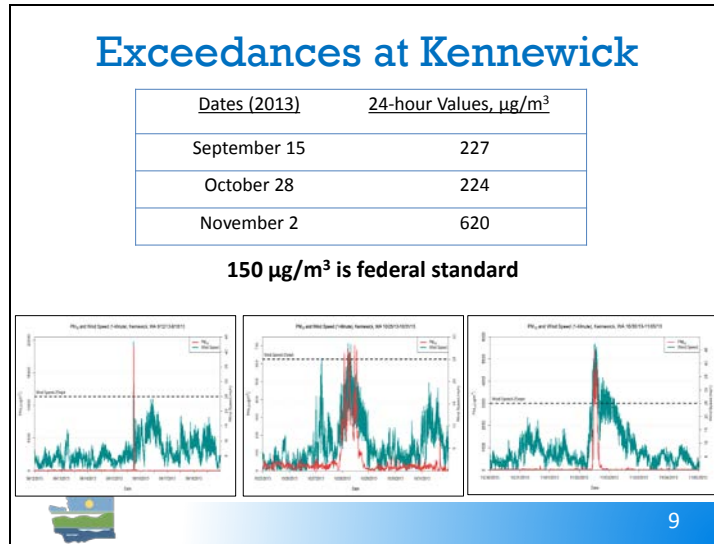
NAAQS or National Ambient Air Quality Standards are federal health-based standards. While there are six main or “criteria” pollutants, today we’ll talk about just one of those...PM 10 or Particulate Matter with a diameter of 10 microns or less.

You can see by the graphic on this slide that PM10 is many times smaller than the diameter of a human hair. This means that these particles are small enough to get deep into our lungs and cause a host of health concerns, especially for our most vulnerable citizens, like children or the elderly.

Just what is the standard? The NAAQS for PM10 is 150 micrograms per cubic meter...and can’t be exceeded at the monitor more than **three times in three years**.

**An exceedance is when a monitor records a value over the standard.** A violation is based on multiple years of data, so an exceedance doesn’t mean that a violation occurred.

**But, as I mentioned, we had three exceedances in about two months in the fall of 2013. If the events didn’t qualify for exclusion, Kennewick would be in violation of the federal standard. The consequences of this are serious. If an area is classified as a nonattainment area, there are complications for the transportation planning agencies, business permitting and long-term planning requirements. Although rare, if plans are not turned in or are not adequate, federal highway funds could be at risk.**



So here in the table are the dates and monitored readings for the three days; the charts below show 1-minute wind speeds and PM10 levels. The graphs correspond to the dates in the table, from left to right. The green line is the wind speeds; the red lines are PM10 values. You can see that the 24 hour values are over 150  $\mu\text{g}/\text{m}^3$  at some point on each of these days. In the report, these graphs are in their Event Day sections.



## Dust from Agricultural Lands

<p><b>Agriculture</b> lands were the largest source of dust</p> <ul style="list-style-type: none"><li>• Oregon</li><li>• Washington</li></ul>	<p><b>Challenge:</b> Public and EPA may not be familiar with how dust is controlled on agricultural lands</p>	<p><b>Ecology asserts:</b> – Controls on Ag lands are adequate; Ag lands were 'reasonably controlled'</p>
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10

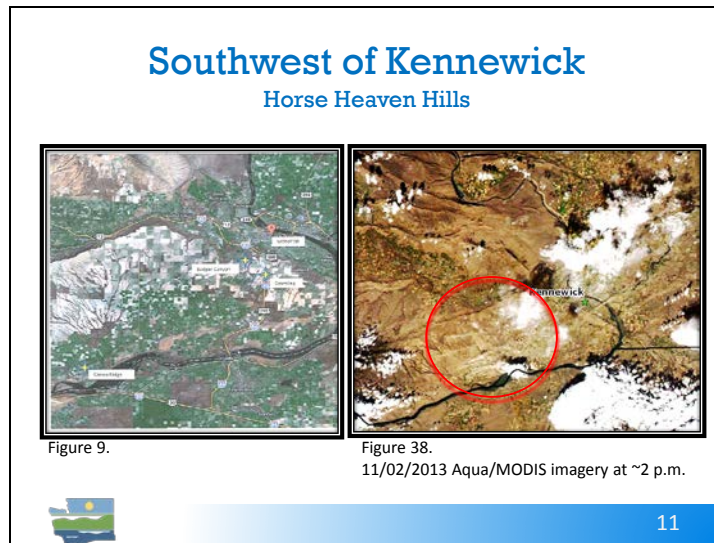
I thought this report might interest you because agricultural activities and lands are the main the source of the dust on the Plateau - especially when high winds occur. Dust could have come from either Oregon and/or Washington agricultural lands or both for two of the events.

The report may raise questions about agricultural conservation practices. I think it's safe to say that most people are not familiar with how dust is controlled from agricultural lands. So, we explained that growers use voluntary federal programs to control dust.

Ecology and our partners laid out the case that agricultural lands were reasonably controlled but the storms overwhelmed these controls.

I'll explain how we came to these conclusions and what evidence we used.

But before we go on, I should note that we considered other sources. These other sources, too, must be adequately controlled. While other sources may have contributed some portion of the dust, we think they were minimal compared to agricultural lands.



Kennewick's Metaline Avenue monitor was the one that exceeded the 24 hour PM10 standard three times in the fall of 2013. It's shown on the satellite photo on the left as the red map pin. This photo also shows a wealth of agricultural lands, including the Horse Heaven Hills located southwest of Kennewick

The photo on the right is from the November 2 event. In the lower left hand corner, you can see dust trails traveling up from the southwest inside and to the right of the red circle.

### Exceptional Event Rule

- 
- 
- 
- 

- Provides process to exclude
- 6 criteria pollutants
  - Not reasonably controllable or preventable (nRCP)

12

The Exceptional Event Rule provides a way for us to ask EPA to leave out values over the standard that were caused by natural events and were beyond our control.


There's also a lot of other requirements and specific information you have to collect to show you meet all the criteria in the rule.

But the piece that I thought you'd like to hear about most is the requirement to show that 'human' or anthropogenic sources were adequately controlled. nRCP stands for "not reasonably controllable or preventable".

Remember, not only must **we convince EPA**, but our conclusion and evidence also must also pass **public scrutiny as there will be a comment period**.

### How do we know?

- Decades of research
  - WSU, USDA, others
- Zoning
- Satellite photos
- Emission inventories
- Meteorological networks



13


So, how do we know that agricultural lands were the source of dust?

We know this based on a number of things. We know this based on ...

- over twenty years of well-documented research by WSU and others
- satellite photos showing the prevalence of agriculture on the Plateau
- Zoning
- emission inventories
- And information from a widespread, well-established meteorological data network – operated by Ecology, Oregon’s DEQ, USDA and others.

## Ecology NEAP

- Research, conservation measures captured in Natural Events Action Plan
  - agriculture lands and activities are the biggest contributor of particle pollution
  - .....*Epecially when high winds occur*

14

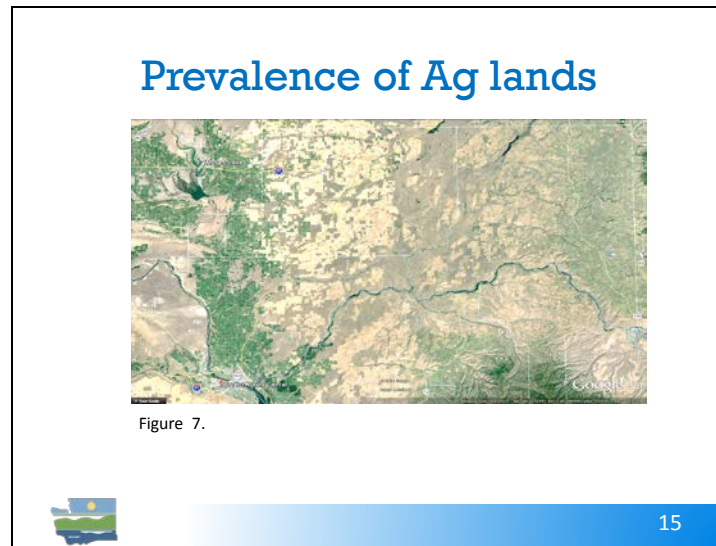
The Columbia Plateau has been extensively studied. When three areas -- Spokane, Yakima and Wallula -- were out of compliance with the federal standard in the '80s, agencies partnered up and growers stepped up. A lot of progress has been made in reducing soil erosion since then.

WSU and partners, including USDA's Agriculture Research Service (ARS), EPA, University of Idaho, Oregon State University and Ecology worked together in the '90s to study the area under the Columbia Plateau PM10 Project.

As part of this project, they conducted extensive dispersion modeling, wind tunnel experiments and other research and analysis and determined the major source of windblown dust on the plateau is agricultural land.

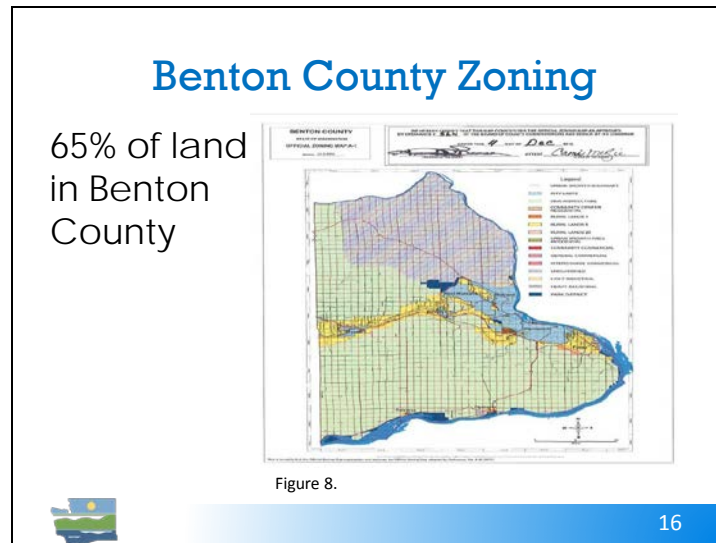
They also studied the soil, wind erosion rates, researched implements and practices that minimize soil erosion and worked to encourage grower adoption of soil erosion prevention practices. WSU and USDA continue to research farming methods and equipment to minimize soil erosion.

We captured much of the research in our Natural Events Action Plan. During the last twenty plus years of study, it has been well established that agricultural lands are the largest contributors to dust – especially during high wind events.

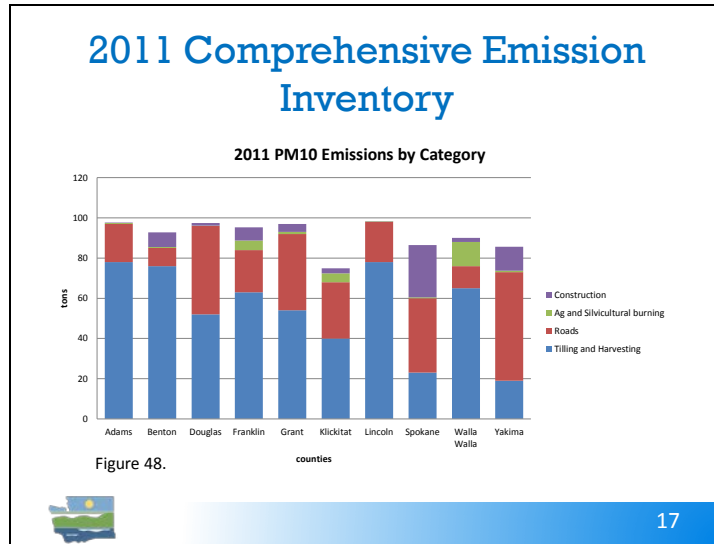


If a picture is worth a thousand words, then this picture must be worth 10,000 words. Kennewick is in the bottom left corner.

This picture of most of the Columbia Plateau shows that agriculture is the dominant land use in the area. The green areas, mostly circles, are irrigated lands; brown squares are likely dryland farming.



Kennewick is in Benton County. This slide shows zoning for the county. The green area is zoned for agriculture and you can see that agriculture zoning covers more than half of the county. Benton County has 65% of its land in farms.



Another way we know that agricultural activities are the largest source of PM10 is emission inventories.

Tilling and harvesting accounted for 36% of PM10 emissions for the whole state in 2011. This category has been the largest for decades.

This slide shows Ecology's 2011 emission values for specific categories for the Columbia Plateau counties. Blue is the portion that tilling and harvesting contributes to the total for each county. Red represents emissions from roads. As you can see, tilling and harvesting are the biggest source of particle pollution for most Columbia Plateau counties.

For Yakima and Spokane, roads contributed more to the total than agriculture activities in 2011. As areas urbanize, agriculture contributions can decrease and road and construction emissions increase.



**‘Reasonably Well Controlled’**

- Worked with experts
  - USDA
  - FSA
  - Benton/Franklin Conservation District



18

How did we make the case that agriculture was well controlled? We worked with the experts.

Benton, Franklin conservation districts and USDA, both the Natural Resources Conservation Service and the Farm Service Agency provided info for this report.

**Evidence provided**

Stated: Agricultural sources are adequately controlled



19

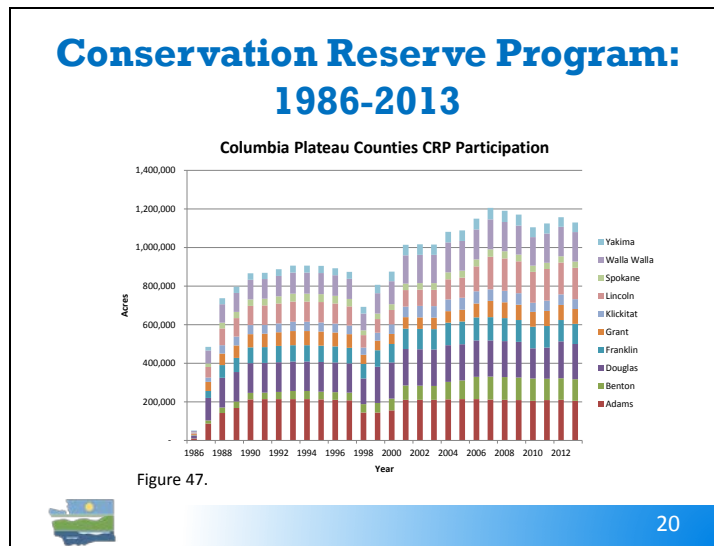
<Stop for questions>>>>>>>

NRCS and FSA provided statistics for us; Benton Conservation District gave us some info on special projects as well.

After looking at all the evidence, we determined that agriculture sources are reasonably well controlled.

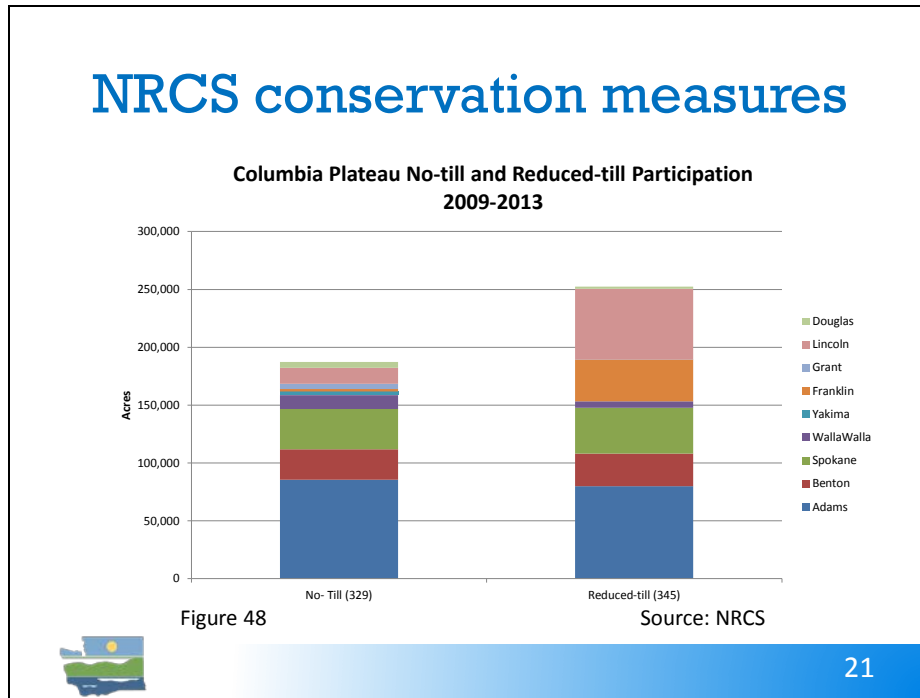
You'll find this information on the evidence we gathered in the Controls Analysis section of the report, Section 6.

This postcard is sent to growers by FSA to encourage them to consider reenrolling in their Conservation Reserve Program.



FSA's Conservation Reserve Program – which offers farmers incentives to remove highly erodible land from production – continues to enjoy high participation.

This graph of CRP participation is by county from 1986 to 2013. You can see that participation in this program has remained high over these years. Participation topped a million acres about 2001.



Washington NRCS was able to get some participation numbers for us too. They offer incentive programs for farmers to engage in no-till and reduced-till practices, among many others. This graph shows acreage under contract for no-till and reduced till measures by county for 12 years.


The counties are represented by their color from top to bottom. If you read from the bottom up, Adams County is blue and Benton County is red. Spokane is next in line with green. Lincoln and Franklin County are the top two blocks on the reduced-till column.

250,000 acres used some form of reduced-till practice from 2009 to 2013.

I just discovered this morning that this figure is missing from the report.

## Ecology Determination

- Controls adequate/reasonable
  - USDA conservation measures participation tracking


22

*So, based on this information, we concluded that the level of USDA conservation measures in place before the fall of 2013 was sufficient to fulfill reasonable control requirements under the Exceptional Event Rule.*

Unfortunately, despite these controls, the unusual weather that brought high winds were exceptional events that overwhelmed these measures.

**EPA review of draft**

- Likely approve request
- Will leave out values for Wallula maintenance plan update
- Next Demo may be more difficult



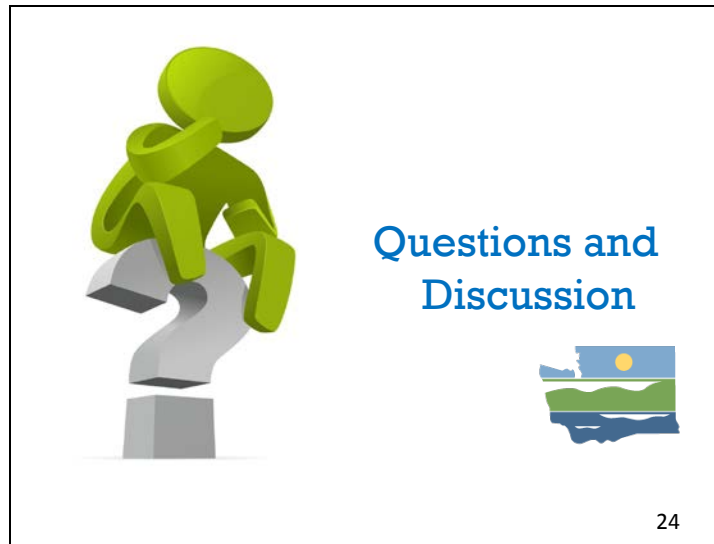
23

We've been working closely with EPA to make sure our report will meet the EER requirements. EPA said they will likely approve our demonstration for these three exceedances.

EPA's decision is not final until they use it in a regulatory decision. Once EPA agrees, we can leave out these values when we calculate a compliance value for nearby Wallula, when we update their air quality plan. When this yet-to-be-written plan goes out for public comment, EPA can still be challenged on their decision to agree with us.

But if, or I should say when – we have to do another demonstration, we are likely to have a more difficult time getting approval. Some people might think that if an exceedance occurs in spite of controls, perhaps the controls are not adequate. We believe that controls were adequate, but were just overwhelmed.

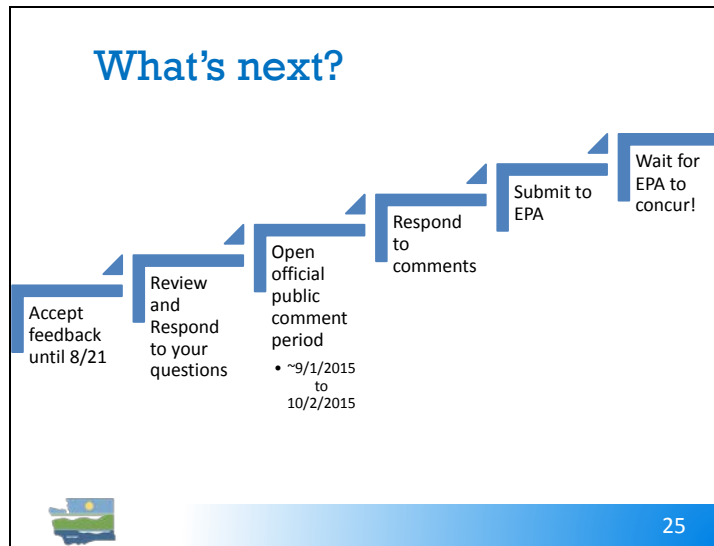
For future exceedances, other sources and agriculture controls will likely come under closer scrutiny.



At this point, we plenty of time to try to answer your questions. Remember, you can always send me your questions or call me after the webinar.

<Moderator will explain how to send in comments during the webinar (again) and how to raise your hand for a question. >

Have there been any questions come in so far?  
Let's look at the questions submitted so far and start with those.



We'll accept your feedback until August 21<sup>st</sup>.

Then, we'll...

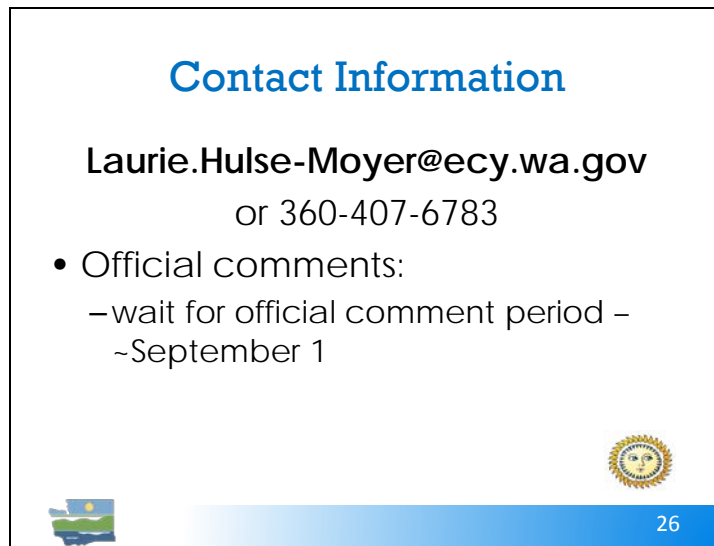
About September First, we'll open the official comment period. It'll go for 30 days or more, probably ending October Second.

We'll respond to any comments we get

Submit it to EPA and

Wait for EPA to agree or concur!







**Contact Information**

**Laurie.Hulse-Moyer@ecy.wa.gov**  
or 360-407-6783

- Official comments:
  - wait for official comment period –
  - ~September 1



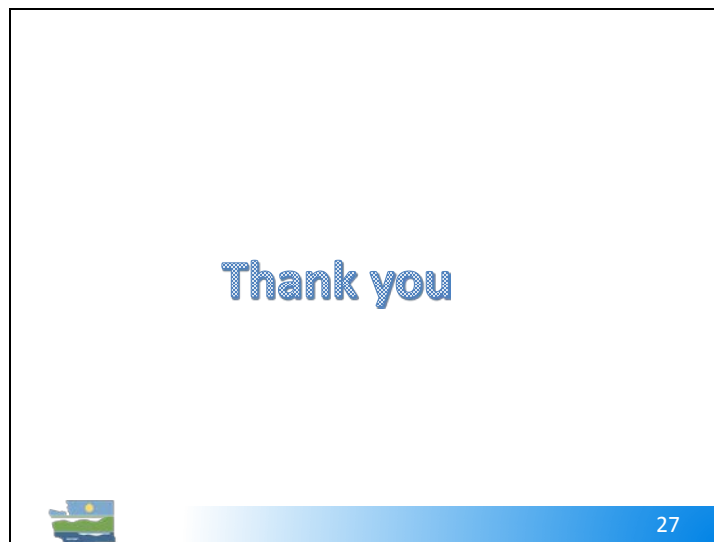
26

Here's my contact info.


Again, thank you for your interest. Send your questions or feedback to me.

....

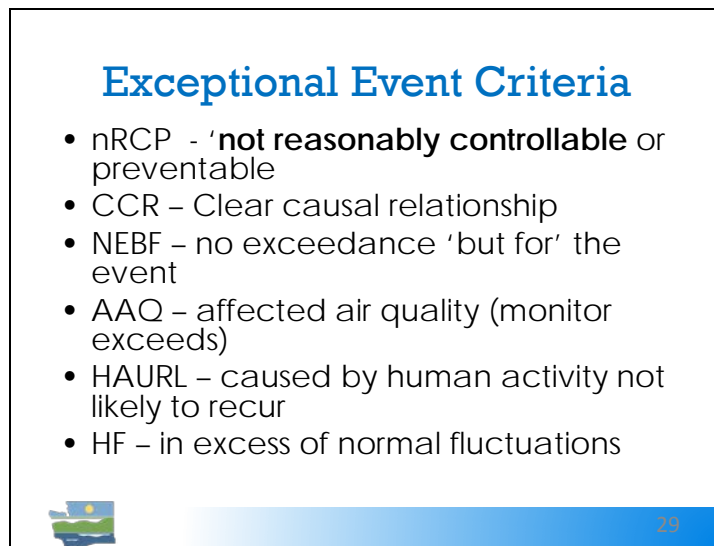
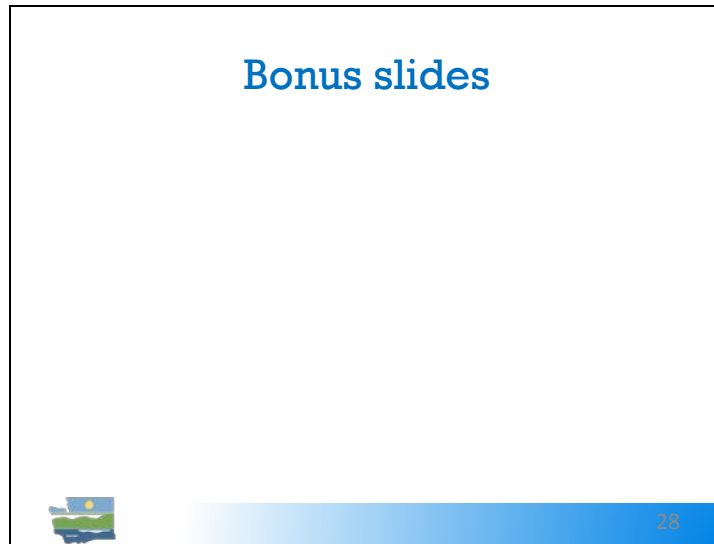
If you want your comments to be official and go on the record, submit them during the official comment period, which as I said we think we'll be starting about September 1.



**Thank you**



27



## Announcing comment period

Same distribution list as July 31, 2015 email above

### Email Notice to Comment to Agricultural Groups/ Interested Parties, September 4, 2015

**From:** [Hulse-Moyer, Laurie \(ECY\)](#)  
**To:** [Hulse-Moyer, Laurie \(ECY\)](#)  
**Cc:** [Caudill, Anya \(ECY\)](#); [Jones, Jocelyn \(ECY\)](#)  
**Subject:** Comments solicited thru 10/5, webinar recording available on 2013 Kennewick "Exceptional Event" report  
**Date:** Friday, September 04, 2015 11:11:52 AM

---

Hello, again!

You are receiving this message because your organization may have an interest in agriculture activities on the Columbia Plateau that can have an effect on air quality.

When we invited you to the August 13 webinar on the 2013 Kennewick Exceptional Event report, we told you we'd let you know when the formal comment period started. We **opened the formal public comment period yesterday** and **will accept comments until October 5**.

[Read the report, watch the webinar or find out how to comment](#)

#### **Background**

Three thunderstorms in the fall of 2013 caused windblown dust and raised levels of particulate matter over the federal air quality standard at Kennewick. Ecology documented these events in an "Exceptional Event Demonstration" and will ask for Environmental Protection Agency's agreement that the values were caused by natural events and shouldn't count against the area.

Many thanks to the organizations that helped to provide information for this report. See our [September 3, 2015 News Release](#).

---

Laurie Hulse-Moyer / Air Quality Planner / WA State Department of Ecology / [lahu461@ecy.wa.gov](mailto:lahu461@ecy.wa.gov) / (360) 407-6783

# Public Involvement Calendar notice

Public Involvement Calendar - WA Dept of Ecology

**DEPARTMENT OF ECOLOGY**  
State of Washington

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## Public Involvement Calendar

**CALENDAR**

More Ecology Events

### Public Involvement Calendar

The Public Involvement Calendar is designed to engage the public in our **decision-making process**. We encourage you to read [Frequently Asked Questions about Effective Public Commenting](#).

Activities that are educational only or are co-sponsored by Ecology may be found under the "More Ecology Events" link in the left column of this page. We invite your [feedback](#) about this Public Involvement Calendar.

### Public Hearings, Meetings, Workshops, Open Houses

(Next 21 days. Use the search feature (right) for events beyond 21 days.)

**Sep 03 2015 Public Comment Period - Kennewick**  
**Oct 05 2015 Comment Solicited on Dust Report**

Ecology is inviting comments on a draft report for three dust storms that caused a particle pollution standard to be exceeded in the fall of 2013. This report will be sent to EPA for approval so that the exceedances won't count against Kennewick's air quality record.

**More Information:** [More Information](#)

**Location:**

Kennewick, WA

**Sponsor:** Ecology  
ECY HQ

**Contact:** Laurie Hulse-Moyer  
(360) 407-6783 / lahu461@ecy.wa.gov

1

Search Calendar

This search feature accesses only **decision-making events**.

Select date range:  
Today & Next 21 Days

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All Cities

....or county:  
All Counties

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All Types

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401  
Air  
Aquifer  
Beach

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One Front Door  
to most government services

<https://fortress.wa.gov/ecy/publiccalendar>[9/16/2015 8:45:06 AM]

# Benton Clean Air Agency website, September 3, 2015

Benton Clean Air Agency

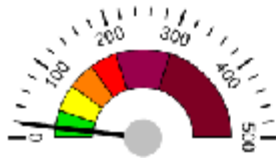
509-783-6198 RESIDENTIAL BURN LINE  
509-783-6570 AGRICULTURAL BURN LINE

 Go

[About Us](#) [Air Quality](#) [Asbestos](#) [Burning](#) [Businesses](#) [Windblown Dust](#) [Public Records](#)



## Washington Air Quality Advisory



### What is WAQA?

**WAQA Value:** 19  
**Pollutants:** PM 2.5, PM10  
**Dominant Pollution:** PM 2.5

[Can I burn today? Click here](#)

### Air Quality Monitoring

An Ozone monitor has been installed in Kennewick; there will now be two monitors shown on [Ecology's Monitoring](#) web page. In Kennewick, the eastern "dot" shows PM10 and PM2.5; the western Ozone.

These pollutants are independently monitored and reported through the Air Quality Index; so the monitors may show different colors.

They can be seen together at [Air Now](#); along with air quality information for the entire US.

Benton County, in south central Washington, includes the cities of Kennewick, Richland, West Richland, Benton City and Prosser. The Columbia River makes up the county boundaries to the north, east and south. Benton County includes confluence of the Snake, Yakima and Columbia rivers, along with the Horse Heaven Hills and the lower Yakima Valley.

Nestled in the heart of Washington's wine country, Benton County is home to five of Washington State's eight American Viticulture Areas, the region produces 99 percent of the state's wine and some of the finest wines in the world. An annual \$3 billion industry, Washington State is the second largest wine producer in the nation.

### Windblown Dust

[State of Washington Notice of Opportunity to comment on proposed Exceptional Event Demonstration](#)

Three unusual thunderstorms created strong winds and dust in Eastern Washington in 2013. The storms overwhelmed agriculture erosion controls and caused air pollution from dust to exceed federal standards. Ecology's report shows that the dust storms were "Exceptional Events" and is asking EPA to leave out the values from these events when determining compliance with air quality standards. Comment period September 3 to October 5, 2015.

[Washington Smoke Information](#) - County, state, and federal agencies provide information for Washington communities affected by smoke from wildland fires

[Statewide Air Monitoring Network](#) - Ecology's monitors, the color codes indicate the air quality at each monitor

[Washington Air Quality Advisory \(WAQA\)](#) - Provides guidance based on the air quality advisory level

[Understanding Burn Bans](#) - A video that explains the different types of burn bans and why they are important

[Emergency Alerts](#) - sign up to receive emergency weather alerts at <http://www.emergencyemail.org/Default.asp>

<http://bentoncleanair.org/>[9/4/2015 12:05:01 PM]

Legal notice, Tri-City Herald, September 3, 2015



**LEGAL PROOF OF PUBLICATION**

Account #	Ad Number	Identification	PO	Amount	Cols	Lines
449227	0001944757	Notice of Opportunity		\$86.94	1	36

**Attention:** Jocelyn Jones  
 DEPT OF ECOLOGY/AIR QUALITY PROGRAM  
 PO BOX 47600  
 OLYMPIA, WA 98504

**State of Washington  
 Notice of Opportunity to Comment**

Ecology is seeking comments on an draft Exceptional Event demonstration report that we propose to send to the Environmental Protection Agency (EPA). Three unusually powerful storms created strong winds and excessive amounts of dust in Eastern Washington in 2013. The storms overwhelmed agriculture erosion controls and caused air pollution from dust to exceed federal standards. Ecology's report shows that the dust storms were "Exceptional Events" and is asking EPA to leave out the values from these events when determining compliance with air quality standards. Federal rules provide a way to request that so areas are not penalized for exceedances of federal air quality standards beyond their control. Review and comment on the draft demonstration from September 3 to October 5, 2015. More information about Exceptional Events and the report are at: [http://www.ecy.wa.gov/programs/air/other/Windblown\\_dust\\_information.htm](http://www.ecy.wa.gov/programs/air/other/Windblown_dust_information.htm)  
 Send comments to:  
 Email: [AQComments@ecy.wa.gov](mailto:AQComments@ecy.wa.gov)  
 Mail to:  
 Laurie Hulse-Moyer  
 Washington Department of Ecology  
 PO Box 47600  
 Olympia, WA 98504-7600  
 #1944757 9/3/2015

**AFFIDAVIT OF PUBLICATION**

COUNTY OF BENTON) .SS  
 STATE OF WASHINGTON)

Samantha Wilder, being duly sworn, deposes and says, I am the Legals Clerk of The Tri-City Herald, a daily newspaper. That said newspaper is a local newspaper and has been approved as a legal newspaper by order of the superior court in the county in which it is published and it is now and has been for more than six months prior to the date of the publications hereinafter referred to, published continually as a daily newspaper in Benton County, Washington. That the attached is a true copy as it was printed in the regular and entire issue of the Tri-City Herald and not in a supplement thereof, ran 1 time(s) commencing on 09/03/2015, and ending on 09/03/2015, and that said newspaper was regularly distributed to its subscribers during all of this period.

*Samantha Wilder*  
 \_\_\_\_\_  
 (Signature of Legals Clerk)

SUBSCRIBED AND SWORN BEFORE ME  
 THIS 8th DAY OF September, 2015

*Louann Hug*  
 \_\_\_\_\_  
 Notary Public in and for the State of Washington  
 residing in Benton County

COMMISSION EXPIRES: 3/1/2019



Washington Department of Agriculture Facebook, September 22, 2015

 **Washington State Department of Agriculture**  
September 22 at 10:47am · 🌐

When the dust kicks up, especially in dry areas like Eastern Washington, it's an air pollution issue that can affect health and safety. If the air particle count is continually high, it can trigger federal actions that complicate transportation planning and business permitting.

The state Dept. of Ecology has sent a report requesting that these dust events be excluded from pollution calculations. The public may comment through Oct. 5. Learn more on Ecology's blog:  
<http://ecologywa.blogspot.com/.../eastern-washington-dust-sto...>



**ECOconnect: Eastern Washington dust storms trigger report to EPA**  
ECOLOGYWA.BLOGSPOT.COM

👍 Like    💬 Comment    ➦ Share

Washington Grown and Susie Notley Bautista like this.

## News Release, Ecology, September 3, 2015

[Ecology home](#) > [News](#) > News Release

### Department of Ecology News Release - September 3, 2015

## Eastern Washington dust storms trigger report to EPA High-pollution levels in Kennewick exceed air quality standards

2013 dust storm, Kennewick, Wash.

OLYMPIA – Outdoor dust occurs throughout Washington, but in dry areas like Eastern Washington, dust is a significant air pollution problem.

Throughout the Columbia Plateau high winds can sweep up dust from farm fields and other unstable areas, and produce fierce dust storms. These dust storms can lead to extremely high levels of particle pollution and impact the community's health and safety.



In 2013, three exceptional storms in Kennewick created high winds and excessive amounts of blowing dust. During these storms, Kennewick's air pollution levels exceeded the national air quality standard.

The Washington Department of Ecology has developed a report showing the dust storms were uncontrollable events. Ecology will submit the report to the Environmental Protection Agency and ask to exclude the high-pollution levels from calculations used to determine if the area exceeded standards.

When standards are exceeded more than three times in a three-year period, local and state air quality agencies are required to take steps to reduce air pollution. The violations may also cause federal impacts that complicate transportation planning and cause stricter business permitting requirements. Plus if plans to return the area to compliance are not adequate, federal highway funds could be at risk.

Members of the public can access the report on Ecology's [Outdoor Dust web page](#) and comment on the report.

### How to comment

**Comments are being accepted Sept. 3 through Oct. 5, 2015.** Submit comments by email to [AQComments@ecy.wa.gov](mailto:AQComments@ecy.wa.gov) or mail to Laurie Hulse-Moyer, Washington State Department of Ecology, P.O. Box 47600, Olympia, WA 98504.



**Contact:**

[Camille St. Onge](#), communications, 360-584-6501; [@ecologyWA](#)

## Media Coverage

Capital Press, September 7, 2015



### Ecology: Uncontrollable dust storms shouldn't count against state

[Matthew Weaver](#)

Capital Press

Published: September 7, 2015 1:05PM

#### **The Washington State Department of Ecology is asking the EPA to not count several 2013 dust storms towards instances of standards violations.**

The Washington State Department of Ecology is asking the Environmental Protection Agency to exclude several 2013 dust storms from calculations used to determine whether the area exceeded particle pollution standards.

When standards are exceeded more than three times in a three-year period, local and state air quality agencies are required to take steps to reduce air pollution, according to Ecology. The violations may also affect federal transportation funding.

Ecology will submit a report to the EPA asking the federal agency to exclude high particle pollution levels from three Kennewick, Wash., dust storms in 2013. Agricultural land in Washington and Oregon were the main source for the dust.

The report found that the storms were uncontrollable events.

Ecology determined in the report that reasonable and appropriate controls were in place, but the wind from the three storms overwhelmed them.

The agriculture controls in place are enough and they're doing the job, said Camille St. Onge, communications manager for Ecology.

We decided what they're doing was adequate at the time, said Laurie Hulse-Moyer, air quality planner for Ecology.

If the storms are counted, the total number of events will exceed the three-time limit, Hulse-Moyer said. There have been two other similar occurrences since 2013, she said, both of which could also qualify as exceptional events, with little or no human cause.

It's unclear what the impact would be for agriculture if the air quality agencies would have to take further steps, Hulse-Moyer said.

They would ask us to look at all sources of air pollution to see what could be done, she said.

It would be speculative for us to say what would be in that plan, St. Onge said.

Farmers primarily work with voluntary programs under the USDA Natural Resources Conservation Service to manage dust by using such techniques as low or no-till methods.

Hulse-Moyer believes it's highly likely EPA will approve of the report.

The public can comment on the report through Oct. 5.

Online: [http://www.ecy.wa.gov/programs/air/other/Windblown\\_dust\\_information.htm](http://www.ecy.wa.gov/programs/air/other/Windblown_dust_information.htm)

< [http://www.ifiberone.com/news/state-determines-farmers-not-at-fault-for-dust-storms-in/article\\_e6101852-5684-11e5-8b30-b7f7baf84d51.html](http://www.ifiberone.com/news/state-determines-farmers-not-at-fault-for-dust-storms-in/article_e6101852-5684-11e5-8b30-b7f7baf84d51.html)>

## State determines farmers not at fault for dust storms in 2013



USGS

### Dust storms

Posted: Tuesday, September 8, 2015 4:54 pm | Updated: 4:56 pm, Tue Sep 8, 2015.

[State determines farmers not at fault for dust storms in 2013](#) By Devin Higgins, EPHRATA – State officials determined farmers were not at fault for three dust storms in 2013.

The Washington State Department of Ecology recently submitted a report to the Environmental Protection Agency about three severe dust storms in Kennewick in 2013.

The report outlined the circumstances surrounding three exceptional storms which hit the Kennewick area in the summer of 2013. The combination of high winds and excessive dust led to the city's air quality exceeding the national air quality standards.

When standards are exceeded more than three times in a three-year period, local and state air quality agencies are required to take steps to reduce air pollution. The violations may bring repercussions at the federal level through stricter business permitting requirements and a loss of federal highway funds.

The Department of Ecology's findings showed the storms were the result of uncontrollable events and not through poor or mismanaged farming practices.

Department of Ecology Communications Manager Camille St. Onge stated the drought and climate conditions impacted rural areas of Washington, and there's a likelihood of storms continuing to affect rural areas including Grant County.

"It is very possible such events could happen again in those areas. What we are keeping an eye on are the factors which are causing them to happen, be they natural circumstances or aided somehow by the people who live and work there," St. Onge said.

The Department of Ecology has been working with the Environmental Protection Agency on monitoring air quality and hopes to use subsequent data to possibly predict future issues, St. Onge said.

# Tri-City Herald

SEPTEMBER 3, 2015 10:47 AM

## Past Kennewick dust storms could affect air regulations



The state is asking that the federal government consider severe dust storms in Kennewick two years ago as uncontrollable events that will not effect air quality requirements. Courtesy Washington state

Read more here: <http://www.tri-cityherald.com/news/local/article33740067.html#storylink=cpy>

The state of Washington is asking the federal government not to include three severe dust storms in 2013 when it calculates air quality standards for Kennewick.

High winds swept up dust from farm fields and dirt patches, fouling the air to a level that caused pollution to exceed the national air quality standard.

If federal air quality standards are exceeded more than three times in three years, local and state agencies are required to take steps to reduce air pollution. In addition, requirements for businesses could become stricter and federal transportation funds could be withheld.

The Washington Department of Ecology has developed a report to show the Environmental Protection Agency that the dust storms were uncontrollable events.

Comments may be made on the report through Oct. 5 by emailing [AQComments@ecy.wa.gov](mailto:AQComments@ecy.wa.gov). The report is posted at [1.usa.gov/1Qbi1nM](http://1.usa.gov/1Qbi1nM).



Washington Agricultural Radio Network Interview, September 18, 2015  
[Link](http://aginfo.com/Assets/Audio/EPA_Dust_Report.mp3) to hear interview < [http://aginfo.com/Assets/Audio/EPA\\_Dust\\_Report.mp3](http://aginfo.com/Assets/Audio/EPA_Dust_Report.mp3)>

EPA Dust Report - AgInfo.net

The screenshot shows the AgInfo.net website interface. At the top left is the AgInfo.net logo with the tagline "The West's Largest Agribusiness Radio News Network". A navigation bar contains links for HOME, CAYAC, SPORTSMAN'S SPOTLIGHT, WEATHER, MARKETS, ABOUT US, AGENCY PLANNING TOOL, AGINFO FACEBOOK, and OPEN RANGE. The main content area features a large banner with the text "WE'RE IN YOUR BUSINESS" and a "North FARM CRED" logo. On the left, a sidebar lists various news reports with arrows indicating they can be expanded. The main article is titled "EPA Dust Report" by Greg Martin, dated September 18, 2015. It includes a photo of Greg Martin and a play button for an audio report. The article text discusses air quality issues near Kennewick, WA, and mentions a public comment period.

**AgInfo.net**  
The West's Largest Agribusiness Radio News Network

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**WE'RE IN YOUR BUSINESS**

**EPA Dust Report**  
by [Greg Martin, click here for bio](#)

**Program:** [Washington Ag Today](#)  
**Date:** September 18, 2015

**Click on the play button to listen to report.**

**Download Report:** [EPA\\_Dust\\_Report.mp3](#)

EPA Dust Report. I'm Greg Martin with Washington Ag Today.

Air quality is at the heart of a report being sent to the Environmental Protection Agency. The issue has been a series of major dust storms near Kennewick. Laurie Hulse-Moyer, Air Quality Planner with the WA State Department of Ecology describes the report.

HULSE-MOYER: When a dust storm occurs and it causes an exceedance of a federal air quality standard, then if it's a natural event there is a way that we can write up a report and make it so that it doesn't count against the area.

In 2013, three exceptional storms in Kennewick created high winds and excessive amounts of blowing dust. During these storms, Kennewick's air pollution levels exceeded the national air quality standard.

HULSE-MOYER: If we want to claim, as is true, that the dust storm caused the exceedance then we have to write a report and write up all the potential sources of the dust and what kind of controls they have. We've evaluated the control measures that agricultural sources use and found them adequate so that despite these controls there was an exceedance.

There is a public comment period open right now on this report. She explains why this report is important.

[http://aginfo.com/index.cfm/report/id/Washington-Ag-Today-32080\[9/18/2015 7:40:09 AM\]](http://aginfo.com/index.cfm/report/id/Washington-Ag-Today-32080[9/18/2015 7:40:09 AM]) EPA Dust Report - AgInfo.net

HULSE-MOYER: The standard is you can have three exceedances in three years but if you go over that then you've violated the standards. It complicates things for business permitting and it just kind of put a spotlight on the area so there would be more discussion of whether controls on agriculture were adequate.

And that's Washington Ag Today. I'm Greg Martin, thanks for listening on the Ag Information Network of the West.

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