Responses to Comments Received on the Draft $PM_{2.5}$ Exceptional Event Demonstrations

August 4, 2025 – September 4, 2025

On August 4, 2025, the Georgia Environmental Protection Division (EPD) issued a public notice requesting comments on Georgia's Draft $PM_{2.5}$ Exceptional Event Demonstrations. The public comment period ended on September 4, 2025. On September 4, 2025, Georgia EPD received two sets of written comments from the Midwest Ozone Group and the Southern Environmental Law Center. A summary of the comments and EPD's responses have been provided below.

Midwest Ozone Group Comments

Comment: The Midwest Ozone Group ("MOG") is pleased to provide comments in support of these proposed demonstrations.

MOG fully supports the EPD request that the US EPA Administrator exclude the ambient $PM_{2.5}$ concentrations measured at the Augusta, Columbus, Macon, Sandersville, Atlanta, and Rossville, Georgia, monitoring sites during all these documented events from calculations of annual $PM_{2.5}$ design values and from other regulatory determinations.

As set forth in its proposed demonstrations, EPD has shown that the documented events caused the $PM_{2.5}$ exceedances at the monitors in Augusta, Columbus, Macon, Sandersville, Forest Park, and Gwinett Tech, Georgia. EPD correctly notes that exclusion of the data on the relevant dates would result in attainment of the 2024 revised primary annual $PM_{2.5}$ NAAQS at these monitors.

Congress has made it clear that data of the nature described in this proposed demonstration cannot and should not be used to implement a National Ambient Air Quality Standard and other matters of regulatory significance.

EPD Response: Georgia EPD appreciates the comments of support.

Southern Environmental Law Center Comments

Comment: On behalf of Environment Georgia Research & Policy Center, the Natural Resources Defense Council, the Georgia Chapter of the Sierra Club, the Savannah Riverkeeper, Sustainable Communities Augusta, and the Southern Environmental Law Center, I write to submit comments regarding the Georgia Environmental Protection Division's Exceptional Event Demonstrations for events occurring between 2022-2024. Comments were previously submitted regarding the Exceptional Event Demonstration for events occurring between 2021-2023. To the extent relevant to the current demonstration, those prior comments are incorporated by reference.

EPD Response: Previous comments received for Exceptional Event Demonstrations for the years 2021-2023 and Georgia EPD's responses can be found at https://epd.georgia.gov/air-protection-branch/air-branch-programs/planning-and-support-program/exceptional-event.

Comment: We recognize the importance of prescribed fire in maintaining the ecology and safety of Georgia's forests. We also recognize the challenges associated with implementing the Exceptional Event Rule in Georgia, where prescribed fire is used differently than in the Western United States. Although the Exceptional Event Rule allows exceedances to be discounted in specific circumstances, it does not change the fact that Georgians are experiencing elevated levels of air pollution and suffering adverse health consequences as a result. The Exceptional Event Rule should only be used to the extent authorized by law and only where all possible measures to reduce and minimize prescribed fire smoke have been exhausted.

EPD Response: The Georgia EPD exceptional events demonstrations have followed EPA's regulations and guidance for identifying eligible days and have presented sufficient evidence to support the approval of our exceptional events demonstrations that were submitted to EPA via the State Planning Electronic Collaboration System (SPeCS) on September 19, 2025. Georgia EPD is confident that our 2008 certified Georgia SMP was adequate to control smoke emissions from prescribed fires and protect public health for all exceptional events in 2022-2024 and that our revised 2025 certified Georgia SMP will provide the needed protection going forward. In addition, Georgia EPD and the Georgia Forestry Commission are looking at new approaches for restricting prescribed burning to reduce the number of $PM_{2.5}$ exceedances.

Comment: Protecting Georgians from Unsafe Levels of $PM_{2.5}$ is Essential for Public Health.

The 2024 EE Demonstrations carry significant consequences for communities living with $PM_{2.5}$ levels above the standard. Exposure to fine particle pollution causes serious health problems. Fine particles in the air we breathe, such as $PM_{2.5}$, are small enough to penetrate and lodge deep into the lungs, leading to asthma attacks, shortness of breath, fatigue, missed workdays, costly emergency room visits, and more. In fact, fine particles cause more detrimental health effects than any other pervasive pollutant in the United States—nearly 63 million people nationwide experience unhealthy spikes in daily $PM_{2.5}$ pollution.

While even short-term exposure to fine particles can lead to these health issues, long-term exposure, which is experienced by people living in areas with high particle levels for many years, can lead to more serious consequences, such as reduced lung function, chronic bronchitis, diabetes,

cancer, heart attacks, and premature death. Communities that are most at risk from particle pollution are those already suffering from pre-existing health hardships, and vulnerable populations such as communities of color, low-income communities, children, and older adults.

To combat these health burdens, EPA strengthened the annual health-based NAAQS for $PM_{2.5}$ from 12 to 9 micrograms per cubic meter. The updated standard will prevent up to 4,500 early deaths and generate as much as $46 billion in net health benefits in 2032. To deliver these health benefits to the people of Georgia, EPD must properly identify areas that fail to meet the annual $PM_{2.5}$ NAAQS based on air quality monitoring data.

EPD Response: Georgia EPD believes that areas meeting and not meeting the new annual $PM_{2.5}$ National Ambient Air Quality Standard (NAAQS) were properly identified in the letter titled "Georgia's Designation Recommendations for the 2024 Annual $PM_{2.5}$ NAAQS" from Georgia EPD Director Jeff Cown to EPA on February 7, 2025. Also, Georgia EPD believes that sufficient evidence has been presented to support the approval of our exceptional event demonstrations that were submitted to EPA via SPeCS on September 19, 2025.

Comment: In implementing the Exceptional Events Rule, the Clean Air Act makes clear that protecting public health is "the highest priority" and necessary measures must be taken to safeguard public health "regardless of the source of the air pollution." "The [Clean Air Act] as a whole, and Section 319(b) in particular is premised on the idea that states should undertake reasonable actions to control emissions and protect public health." The Exceptional Events Rule is intended to operate "in addition to, rather than in place of, reasonable controls." To this end, air agencies seeking to exclude air quality data must show that "appropriate and reasonable" steps have been taken to prevent future exceedances of air quality standards.

Exceptional events are "unusual or naturally occurring events that can affect air quality but are not reasonably controllable using techniques that tribal, state, or local air agencies may implement in order to attain and maintain the [NAAQS]." A "clear causal relationship must exist between the measured exceedances of a national ambient air quality standard and the exceptional event to demonstrate that the exceptional event caused a specific air pollution concentration at a particular air quality monitoring location." In determining whether an air agency adequately demonstrated a clear causal relationship, EPA reviews exceptional event demonstrations on a "case-by-case basis using a weight of evidence approach." Air agencies must demonstrate by the "weight of evidence" in the record that the event caused the specific air pollution concentration at issue.

An exceptional events demonstration must include the following elements:

1. A narrative conceptual model that describes the event(s) causing the exceedance or violation and a discussion of how emissions from the event(s) led to the exceedance or violation at the affected monitor(s);
2. A demonstration that the event affected air quality in such a way that there exists a clear causal relationship between the specific event and the monitored exceedance or violation;
3. Analyses comparing the claimed event-influenced concentration(s) to concentration(s) at the same monitoring site at other times;

4. A demonstration that the event was both not reasonably controllable and not reasonably preventable;
5. A demonstration that the event was caused by human activity that is unlikely to recur at a particular location or was a natural event; and
6. Documentation that the air agency followed the public comment process.

With respect to prescribed fire, the Exceptional Event Rule further defines the information that must be provided to show that the prescribed fire smoke is not reasonably controllable or preventable.

Finally, 40 C.F.R. § 51.930 provides that air agencies seeking to exclude air quality data due to exceptional events must take appropriate and reasonable actions to mitigate and protect public health from exceedances or violations of NAAQS. At a minimum, the air agency must undertake mitigation efforts including "the implementation of appropriate measures to protect public health from exceedances or violations of ambient air quality standards caused by exceptional events." Areas with historically documented or known seasonal events that may cause exceedances are required to develop a mitigation plan including steps "to abate or minimize contributing controllable sources of identified pollutants."

EPD Response: The Georgia EPD exceptional events demonstrations have followed EPA's regulations and guidance for identifying eligible days and have presented sufficient evidence to support the approval of our exceptional events demonstrations that were submitted to EPA via SPeCS on September 19, 2025. Each exceptional event demonstration submitted for approval has fully addressed each of the six elements listed above. A large number of prescribed fires are necessary to maintain a healthy ecosystem and prevent catastrophic wildfires in Georgia. Georgia EPD is confident that our 2008 certified Georgia SMP was adequate to control smoke emissions from prescribed fires and protect public health for all exceptional events in 2022-2024 and that our revised 2025 certified Georgia SMP will provide the needed protection going forward. In addition, Georgia EPD and the Georgia Forestry Commission are looking at new approaches for restricting prescribed burning to reduce the number of $PM_{2.5}$ exceedances.

Comment: The 2024 EE Demonstrations Lack Sufficient Information To Support The Exclusion of Data as Exceptional Events.

As set forth below, the 2024 EE Demonstrations lack information required under the Exceptional Event Rule and EPA guidance to demonstrate that the burn activities meet the regulatory definition of prescribed fire. EPD must show that the fires fall within the regulatory definition of prescribed fire and must show a clear causal connection between the fires and the exceedances. The 2024 EE Demonstrations do not meet these requirements.

EPD Response: Georgia EPD disagrees with this comment. The Georgia EPD exceptional event demonstrations have followed EPA's regulations and guidance for identifying eligible days and have presented sufficient evidence to support the approval of our exceptional event demonstrations that were submitted to EPA via SPeCS on September 19, 2025.

Comment: The EE Demonstrations Lack Required Information Regarding the Fire Activity.

EPA guidance makes clear that seven types of information are required to document a prescribed fire for purposes of the Rule: the location of the fire and a physical description of the area, the date of the burn and previous burns, the time the burn was ignited and ended, the number of acres burned, and the dominant fuel type at the site. The 2024 EE Demonstrations contain some, but not all, of this required information. Of critical importance to the Exceptional Event Rule, the demonstrations lack information regarding the timing of the fires' ignition, conclusion, and the predominant fuel type found at the burn site. Information regarding the timing of the fire is necessary to establish a temporal connection between the burn activity and the air pollution found at the monitor. Information regarding the predominant fuel type is necessary to establish whether prescribed fire is an appropriate land management strategy at the site and, if so, the appropriate burn cycle. Lacking this required and important information, the 2024 EE Demonstrations cannot establish that the challenged fires quality as exceptional events.

EPD Response: Georgia EPD disagrees with this comment. The EPA guidance does not require all information listed to be included. Georgia EPD has included the most important information from the list (latitude/longitude, dates of burns, and total acres burned). In addition, Georgia EPD included a paragraph in the *Human Activity Unlikely to Recur at a Particular Location* section describing the fire-dependent tree stand types found in the counties within a 100-km radius of the monitor.

Comment: The EE Demonstrations Lack Required Information Establishing the Appropriate Burn Cycle For the Site.

The Exceptional Event Rule also requires information regarding the fire return interval appropriate for the site. Lacking site-specific information regarding the predominant fuel type at the actual burn locations, the 2024 EE Demonstrations instead seek to replace this site-specific information with generic, landscape-level scientific research describing fire cycles in the Southeast. Although EPA guidance allows scientific literature to be used to establish the appropriate fire cycle in lieu of a land management plan governing the site, this approach is only authorized "on a case-by-case basis." Without more detailed information regarding the vegetation found at the burn sites, there is no basis to discern the appropriate fire cycle for a particular site based on the vegetation present. Relying on landscape-level information of the type provided in the 2024 EE Demonstrations' approach would effectively negate this requirement entirely and assume that virtually the entire State of Georgia is subject to the same fire cycle.

Further, the 2024 EE Demonstrations fail to establish a general relationship between the natural fire cycle and prior use of fire at the sites. The Exceptional Event Rule does not require the previous use of fire to match the fire cycle suggested in scientific literature, but there must be a "general relationship" between two. Lacking site specific information regarding prior use of fire at these sites, the 2024 EE Demonstrations reverse-engineer county-level numbers based on the average number of acres burned in a county per year relative to the county's total size. But use of fire in the county does not necessarily correspond with the use of fire at a particular site. This approach provides no information regarding the historic use of prescribed fire at the sites identified in the 2024 EE Demonstrations and cannot establish the "general relationship" required by the Rule.

Further, these calculations produce absurd results. For example the 2024 EE Demonstration for Augusta, GA calculates county-level burn averages of 11.2 years in Richmond County, over 100 years in eight other counties, and 1,783.8 years in Laurens County. The 2024 EE Demonstration suggests that all of these counties are subject to the same natural fire cycle, and that these calculated fire cycles all bear a "general relationship" to the appropriate fire cycle. The idea that calculated fire cycles of 11.2 years, 100 years, and 1,783 years are all generally consistent with the same fire natural fire cycle is absurd. EPD's attempt to reverse engineer the information required for an exceptional event demonstration would effectively read this requirement out of existence.

EPD Response: It is not required or reasonable to expect each demonstration to include actual, site-specific information regarding the frequency of prescribed fires at thousands of specific locations. Since information was not available on the actual prescribed fire interval for each specific tracts of land, Georgia EPD calculated an average actual fire interval for each county. Also, Georgia EPD included a paragraph describing the fire-dependent tree stand types found in the counties within a 100-km radius of the monitor. The natural fire return interval is the period between fires without the interference or impact of human activities. Human activities, such as fire suppression or land transformation, have altered many natural fire return intervals, leading to actual fire return intervals that are significantly longer (e.g., 100 years or 1,783 years) than the natural fire return interval. In these counties, prescribed fires should be increased to more closely align with the natural fire return intervals.

Comment: The EE Demonstrations Lack Required Information Demonstrating That the Fires Occurred on Wildlands

The Exceptional Event Rule is limited to prescribed fire occurring predominantly on "wildlands", which is defined as "an area in which human activity and development are essentially non-existent, except for roads, railroads, power lines, and similar transportation facilities. Structures, if any, are widely scattered." The exact meaning of wildland is context- sensitive, but is generally intended to mean areas in a natural, uncultivated or uninhabited condition with very limited human impact on the ecosystem. Relevant here, EPA has suggested that "managed timberlands could be considered wildlands if they have a complex ecosystem affected by only limited human entrance and intervention."

Beyond describing most of the fire events as "silviculture," the 2024 EE Demonstrations provides no further information regarding conditions on the site. There is no information demonstrating that these sites are in a natural, uncultivated, or uninhabited condition as required by the Rule. Some of these silvicultural fires may have occurred on properties that fail to meet this regulatory definition of wildland. Without more information regarding the predominant vegetation on the site, the governing land management plans, and the purpose of burn activities, the 2024 EE Demonstrations lack sufficient information to support the conclusion that these fires occurred predominantly on wildlands.

EPD Response: Georgia EPD disagrees with this comment. The only fires included in our prescribed fire exceptional event demonstrations are silviculture burns. A silviculture burn is a controlled application of fire to a forest or woodland area as a forest management tool. The primary goal is to manage forest conditions by reducing debris, enhancing ecosystem health, pest

and disease control, and wildfire prevention. According to the Georgia Forestry Commission, all silviculture burns are conducted on "wildlands".

Comment: The EE Demonstrations Do Not Establish That the Fires Are Necessary to Avoid Foregone Benefits.

To satisfy the "not controllable or preventable" criterion, the Exceptional Event Rule requires a demonstration to show specific ecosystem benefits that would be foregone if the fire were not conducted. These "forgone benefits" are the objectives described in a multi-year fire management plan to establish, restore, or maintain a sustainable and resilient wildland ecosystem. Once again, lacking site-specific information regarding the purpose of these fires, the 2024 EE Demonstrations seek to satisfy this requirement by discussing prescribed fire's potential benefits generically, such as benefits to threatened or endangered species.

The 2024 EE Demonstrations lack any information to support the conclusion that these specific fires were intended to establish, restore, or maintain sustainable and resilient wildland ecosystems. To the extent these fires were undertaken for another purpose (such as managing monoculture commercial pine plantations) they do not present foregone ecological benefits and therefore are not "reasonably preventable" for purposes of the Exceptional Event Rule. Further, although the 2024 EE Demonstrations discusses potential benefits to fire-dependent species generally, they contain no information showing that these species are known or expected to occur at the location of the fires.

EPD Response: It is not required or reasonable to expect each demonstration to include site-specific information regarding the ecosystem benefits that would be foregone if the fire were not conducted at each of the thousands of specific locations. Rather, the Exceptional Events Rule at 40 CFR 50.14(b)(3)(ii)(C) states that this demonstration may rely upon and reference a multi-year land or resource management plan for the area with a stated objective to establish, restore, and/or maintain a sustainable and resilient wildland ecosystem, and/or to preserve endangered or threatened species through a program of prescribed fire. Georgia's State Wildlife Action Plan (SWAP) is a statewide strategy to conserve populations of native wildlife species and the natural habitats they need before these animals, plants, and places become rarer and more costly to conserve or restore. Georgia's SWAP lists 640 animal and plant species as high priorities for conservation. Also, the Biotics rare species database was used to identify the top three rare, fire-dependent animal species located within a 100-km radius of each $PM_{2.5}$ monitoring site.

Comment: The EE Demonstrations Must Provide Additional Explanation Where HMS Data Does Not Support the Conclusion That Smoke Was Present at the Monitor.

The 2024 EE Demonstrations also fail to provide additional explanation in instances where the information supplied is insufficient to establish the clear causal connection required by the Rule. Specifically, there are several examples where the Hazard Mapping System (HMS) smoke plumes and fire data seem to suggest that little prescribed fire smoke was present at the monitor on the date of the exceedance. One example of this disconnect between the information supplied and the desired conclusion is the HMS data on Feb. 15-16, 2024, in Sandersville, GA.

Other instances where the HMS data appears to show little or no smoke in the vicinity of the monitor are:

- 01.31.2024 - 02.01.2024 (Augusta);
- 02.28.2023 - 03.01.2023 (Columbus);
- 01.14.2022 - 01.15.2022 (Sandersville);
- 11.18.2022 - 11.19.2022 (Sandersville);
- 01.07.2023 - 01.08.2023 (Sandersville);
- 01.28.2023 - 01.29.2023 (Sandersville);
- 02.06.2023 - 02.07.2023 (Sandersville);
- 02.28.2023 - 03.01.2023 (Sandersville);
- 03.08.2023 - 03.09.2023 (Sandersville); and
- 02.15.2024 - 02.16.2024 (Sandersville).

In response to our previous comments, EPD stated that HMS data can be a strong piece of evidence in determining smoke impacts, but the data has limitations. "HMS may show smoke plumes when they do not exist in reality" but also "may show no smoke plumes (due to the presence of clouds) when they do exist in reality."

The limits of HMS data are further underscored by research evaluating its accuracy in predicting ground-level smoke. Comparing HMS data to meteorological conditions observed at airports, research found that HMS data is least accurate in predicting ground level conditions on days classified as "low smoke" days in HMS. Geographically, HMS modeling was found to be least accurate in the "West South Central, East South Central and South Atlantic" regions. In fact, the study recommends that "light smoke plumes should generally be excluded for a binary classification of smoke and non-smoke days at the surface."

Given these known limitations, it is incumbent on EPD to provide additional explanation and evidence to support the demonstrations on days where the HMS data does not support the clear causal connection. Even for Tier 1 days, EPA guidance directs that demonstrations must provide supporting evidence showing that prescribed fire smoke was transported to the monitor. If the HMS data does not support this finding, then EPD must provide additional data or explanation. Given the known limitations of HMS data, EPD cannot rely on this data alone and it is particularly inappropriate where the HMS data does not show the presence of smoke.

EPD Response: Georgia EPD agrees there may be some limitations with the HMS data in certain situations; however, the HMS data is still a strong piece of evidence in the determination of smoke impacts. In some cases, HMS may show smoke plumes when they do not exist in reality. In other cases, HMS may show no smoke plumes (due to the presence of clouds) when they do exist in reality. In addition, the HMS smoke plume product cannot show plumes being transported and dispersed during the nighttime. Therefore, the lack of HMS smoke plume on the map does not factualize that there was no smoke in the area. All the available evidence must be looked at together to make an educated conclusion based on the weight of evidence. For example, a map showing high $PM_{2.5}$ concentrations at the monitor, the presence of multiple nearby large prescribed fires, wind trajectories passing over the prescribed fires on route to the monitor, but no HMS smoke

plumes would likely lead to the conclusion that the prescribed fires were responsible for the high $PM_{2.5}$ concentrations and that HMS missed the smoke plumes.

It should be noted that Appendix A of the prescribed fire exceptional event demonstrations contains integrated maps for each exceedance day (map on the right) and the day before (map on the left). The maps include silviculture burn permits issued by the Georgia Forestry Commission, National Oceanic and Atmospheric Administration (NOAA) Hazard Mapping System (HMS) smoke plumes (light and dark grey shaded areas), and 24-hour $PM_{2.5}$ concentrations at the $PM_{2.5}$ monitor site and other nearby sites. Both maps contain Hybrid Single-Particle Lagrangian Integrated Trajectory (HYSPLIT) back trajectories for hourly measured $PM_{2.5}$ concentrations above 9.0 $\mu g/m^3$ on the exceedance day. The left map shows the back-trajectories for 0:00 AM-9:59 AM EST on the exceedance day, and the right map shows back-trajectories for 10:00 AM-11:59 PM EST on the exceedance day. Also, Georgia EPD added HYSPLIT trajectories for two different starting heights (100-m and 500-m) for all prescribed fire exceptional event days to better understand the transport of smoke from prescribed fires. Finally, hourly $PM_{2.5}$ time series plots are shown for the exceedance day and the day before to demonstrate the timing of fire emissions impacts on $PM_{2.5}$ concentrations at the monitor. In total, three lines of evidence supporting the clear causal relationship are presented in each map. Since all the smoke episodes listed in the comments above are Tier 1 days, only one line of evidence is required. Even if the HMS smoke plumes are missing, there are still two other lines of evidence to support our conclusions.

Comment: EPD Must Validate Its Conclusions With $PM_{2.5}$ Speciation Data Where Available.

We previously encouraged EPD to utilize $PM_{2.5}$ speciation data to support its conclusion that the exceedances were a result of prescribed fire smoke rather than other pollution sources at locations where that data is available. EPD responded that it "does not feel the speciation data is necessary to support our conclusions."

In evaluating exceptional event demonstrations, EPA uses a "weight of the evidence" approach that considers all relevant evidence and qualitatively weighs the evidence based on its relevance, degree of certainty, persuasiveness, and other considerations appropriate to the pollutant and the type of event. Here, the monitors at Macon-Allied (13-021-0007), Columbus- Baker (13-215-0012), and Augusta (13-245-0091) are all part Georgia's Speciation Trends Network. The speciation data available at these monitors could help establish that the $PM_{2.5}$ pollution present at the monitors on the exceedance dates is attributable to prescribed fire. Conversely, this data could also demonstrate that the exceedances do not result from other pollution sources. Given the availability of this information and its direction relevance to the question at hand, a negative inference must be drawn from EPD's decision to exclude this information in weighing the available evidence.

EPD Response: Georgia EPD disagrees with the statements that "EPD Must Validate Its Conclusions With $PM_{2.5}$ Speciation Data Where Available" and that "a negative inference must be drawn from EPD's decision to exclude this information in weighing the available evidence". Since $PM_{2.5}$ speciation data is only available on a 1-in-6 day sampling schedule, this data will not be available for most of the prescribed fire exceptional event days. Instead, Georgia EPD focused on data that was available for all prescribed fire exceptional event days. Based on the amount of data

that was available for all prescribed fire exceptional event days, we determined that the speciation data was not necessary to support our conclusions.

Comment: Recommendations Moving Forward

The two sets of exceptional event demonstrations submitted by Georgia in the past year appear to be the most extensive use of this Clean Air Act provision in the statute's history. Georgia is among the leading states in the country in its use of prescribed fire, and EPD has indicated that it may seek to exclude data for approximately 100 events annually due to the impacts of prescribed fire smoke.

To be clear, we support the appropriate use of prescribed fire to maintain forest health, prevent wildfire, and create species habitat. We also recognized that the Exceptional Event Rule can be difficult to implement in Georgia given the ways that prescribed fire is utilized here compared to the West. Georgia's prescribed fire is more widespread, often at a smaller scale, and more often occurs on private property than the large-scale prescribed burns conducted on federal lands in the West. These differences create recordkeeping and documentary challenges for EPD in implementing the Exceptional Events Rule.

However, excluding air pollution data is an extraordinary step that must be used sparingly and only where clearly appropriate. Even if the Rule allows data to be excluded from regulatory consideration, that does not change the fact that Georgians are breathing unhealthy levels of air pollution in these areas. The Exceptional Event Rule should only be used where air pollution truly cannot be avoided or controlled. To that end, we submit the following six recommendations to improve the coordination, permitting, and pollution controls to prevent unnecessary NAAQS exceedances as a result of prescribed burn activities.

1. The recordkeeping related to Georgia's burn permit system should be updated to ensure that all information necessary to support future exceptional event demonstrations is recorded at the time the burn is authorized. Improved documentation and recordkeeping will facilitate EPD's preparation of future demonstrations and ensure that site specific information is available to meet the Rule's requirements. In particular, Georgia's burn permitting system should begin tracking: (i) the dominant vegetation type at the site; (ii) the approximate date of the last prescribed burn at the site; (iii) the land management objectives that would be advanced through the burn; and (iv) the start and end times for the burn.

2. Drawing on the success of the Albany 2.0 program, EPD should adopt a similar modeling and coordination regime in other areas with recurring prescribed fire pollution. EPD, the Georgia Forestry Commission, and other partners have engaged in a pilot program to better coordinate burn activity in the vicinity of Albany, GA. It appears that this program has allowed high levels of prescribed burn activity to continue with fewer NAAQS exceedances that must be addressed as exceptional events. We encourage EPD to continue this program in Albany and expand its scope to include Columbus, Macon, Sandersville, and Augusta.

3. EPD must better prioritize between burn activities on days when meteorological conditions are unfavorable and air quality standards are likely to be impacted. Every exceedance identified in the 2024 EE Demonstrations includes a combination of silvicultural and non-silvicultural burns. On average, 9.6% of the burns on the exceedance dates were for non-silvicultural purposes. Removing these non-silvicultural burns may not avoid the exceedances entirely, but their removal would reduce air pollution present at the downwind monitors and free up air pollution load that could otherwise be available for silvicultural burns on these dates.

   On days where burn activity has the potential to result in NAAQS exceedances, EPD and the Georgia Forest Commission should prioritize burn activities and defer lower priority burns until meteorological conditions improve. These lower priority burns may be non-silvicultural burns, silvicultural burns that are less time-sensitive, or land management objectives that can achieved through non-burn treatments. To the extent certain non-silvicultural burns fall outside the permitting requirements of Georgia's open burning laws, that legal shortcoming must be addressed.

4. A circuit-breaker policy should be instituted to prevent multi-day NAAQS exceedances. EPA guidance suggests that multi-day exceedances should not occur if prescribed fire is properly managed. Yet Georgia continues to experience multi-day events in recent years. These multi-day events are proof that the current system for coordinating burn permits does not operate correctly in certain circumstances. Additional burn permits should not be issued in the vicinity of a monitor that is already exceeding the NAAQS. Georgia should institute a "circuit breaker" policy, in which no additional burn permits are issued in the vicinity of a monitor that is exceeding, or recently exceeded, a NAAQS.

5. More prescriptive and enforceable smoke management requirements must be adopted. Georgia revised its Smoke Management Plan in May 2025, after the events covered in the current demonstrations. Although it remains to be seen how these changes will impact exceedances and future use of the Exceptional Event Rule, it appears that many of the Smoke Management Plan's key provisions remain aspirational, unclear in their application, and will likely be difficult to enforce. The Exceptional Event Rule is not intended to excuse pollution from sources – including prescribed fire – that can be better controlled. EPD must adopt measures to ensure that prescribed fire smoke is reduced to the maximum extent possible and that burns are coordinated to minimize NAAQS exceedances.

6. Based on recent submissions, Georgia will likely be required to prepare a mitigation plan under 40 C.F.R § 51.930 as an area experiencing recurring exceptional event issues. Rather than delaying this effort, EPD should begin proactively developing this plan and implementing these measures to avoid further public health impacts from prescribed fires that could be better controlled. Beyond public notification and public education, this plan must include "measures to abate or minimize contributing controllable sources of identified pollutants." Whether framed as a smoke management plan, a mitigation plan, or under another Clean Air Act requirement, Georgia must take more affirmative measures to control and reduce prescribed fire smoke.

EPD Response: Georgia EPD appreciates the list of recommendations for moving forward, and will consider all recommendations presented in these comments. The Georgia EPD exceptional events demonstrations have followed EPA's regulations and guidance for identifying eligible days and have presented sufficient evidence to support the approval of our exceptional events demonstrations that were submitted to EPA via SPeCS on September 19, 2025.

Georgia EPD is confident that our 2008 certified Georgia SMP was adequate to control smoke emissions from prescribed fires and protect public health for all exceptional events in 2022-2024 and that our revised 2025 certified Georgia SMP will provide the needed protection going forward. In addition, Georgia EPD and the Georgia Forestry Commission are looking at new approaches for restricting prescribed burning to reduce the number of $PM_{2.5}$ exceedances.

Comment: Conclusion

We understand the tension that exists between the need to conduct prescribed fire in Georgia's forests and the impact of the resulting smoke on air quality. We also recognize that Georgia is a leader in the national conversation around prescribed fire and the Exceptional Event Rule. We stand ready to work with EPD to develop a workable solution to this problem and best serves the interests of Georgia residents.

EPD Response: Georgia EPD appreciates SELC's understanding of the need for prescribed fires to prevent catastrophic wildfires and will evaluate all recommendations presented in these comments. Georgia EPD is confident that our 2008 certified Georgia SMP was adequate to control smoke emissions from prescribed fires and protect public health for all exceptional events in 2022-2024 and that our revised 2025 certified Georgia SMP will provide the needed protection going forward.