

ENVIRONMENTAL PROTECTION DIVISION

Canadian Wildfire Exceptional Event Demonstration for Exceedances of the 2024 Annual PM_{2.5} NAAQS at Atlanta, GA in 2023

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1. Introduction

The current annual and 24-hour $PM_{2.5}$ National Ambient Air Quality Standards (NAAQS) are 9.0 $\mu g/m^3$ and 35 $\mu g/m^3$, respectively. Federal Reference Method (FRM) monitors collect $PM_{2.5}$ samples for 24 hours on filters while Federal Equivalent Method (FEM) monitors measure hourly $PM_{2.5}$ concentrations continuously. An exceedance of the 2024 annual $PM_{2.5}$ NAAQS occurs when the measured 24-hour $PM_{2.5}$ concentration is greater than 9.0 $\mu g/m^3$.

From 2019 through 2023, one FRM monitor operated at the Fire Station #8 (FS8) air monitoring site. The monitor collected data on a one in three-day schedule. The Atlanta-Sandy Springs-Roswell MSA is in attainment of the 2012 PM_{2.5} NAAQS.

This exceptional event demonstration shows that the FS8 air monitoring site located in Atlanta (Fulton County) in the state of Georgia (AQS ID: 13-121-0039) reported exceedances of the 2024 annual PM_{2.5} NAAQS due to Canadian wildfires on two different days in 2023 that qualify for exceptional events demonstrations (Table 1). These exceedances resulted from the transport of wildfire smoke that originated in Canada; therefore, qualifying them for removal under the Exceptional Events Rule (EER). Design values (DVs) of the FS8 monitor with and without U.S. Environmental Protection Agency (EPA) concurrence are shown in Table 2. DVs are calculated using 24-hour PM_{2.5} measurements from 2021-2023. For each year, these measurements are first averaged into quarterly values, then to a yearly value. The average of these yearly values is reported as the DV. Inclusion of these events produces a DV of 9.1 μ g/m³, which is above the new 2024 PM_{2.5} annual NAAQS; however, exclusion reduces the DV to 9.0 μ g/m³.

There are eight PM_{2.5} monitoring sites in the Atlanta Combined Statistical Area (CSA). One site is a near-road microscale site that is not suitable for comparison with 2024 annual PM_{2.5} NAAQS. All eight PM_{2.5} monitors in the Atlanta CSA were impacted by the Canadian wildfire smoke; however, the other monitors are not exceeding the annual PM_{2.5} NAAQS and thus are not eligible for exclusion under the Exceptional Events Rule. In addition, exceptional event requests are being made for other monitors in Georgia which are violating the PM_{2.5} NAAQS that have also been impacted by Canadian wildfire smoke.

On December 20, 2024, the Georgia Environmental Protection Division (Georgia EPD) submitted an Initial Notification for these events to the EPA. The request indicated that the data identified in Table 1 was impacted by smoke from Canadian wildfires and requested review of the events under the case-by-case provision at 40 CFR 50.14(a)(1)(i)(F). The Georgia EPD formally requests that the EPA concur with the exclusion of these events so as not to influence regulatory decisions resulting from the state's attainment of the NAAQS.

Table 1. Exceedances of the 2024 annual PM_{2.5} NAAQS observed by monitors stationed in Atlanta, GA at the Fire Station #8 site in 2023 that qualify for removal under the Exceptional Events Rule.

#	Date	24-hour concentration (μg/m³)	Cause of exceedance	Tier
1	06/29/23	39.2	Canadian wildfire	1
2	07/17/23	41.5	Canadian wildfire	1

Table 2. Design values (DV) for monitors at the Fire Station #8 site for the 2024 annual PM_{2.5} NAAOS.

Monitor Site	2021-2023 DV without EPA	2021-2023 DV with EPA
(AQS ID)	Concurrence (µg/m³)	Concurrence (µg/m³)
Fire Station #8 (13-121-0039)	9.1	9.0

The EPA has outlined requirements for demonstrations of wildfire events in the 2016 document Guidance on the Preparation of Exceptional Events Demonstrations for Wildfire Events that May Influence Ozone Concentrations and, pertinent to this demonstration, the 2024 supplementary document $PM_{2.5}$ Wildland Fire Exceptional Events Tiering Document. This demonstration will describe how the proposed wildfire events meet the requirements of the EER as described in regulation and the guidance documents, as applicable.

2. Narrative Conceptual Model

The Exceptional Events Rule requires that demonstrations include a narrative conceptual model describing the events. This section describes the 2023 wildfires that affected public health and impacted air quality monitors in Atlanta, GA. Estimates from the National Oceanic and Atmospheric Administration (NOAA) Hybrid Single-Particle Lagrangian Integrated Trajectory model (HYSPLIT) model are used to describe the transportation of wildfire smoke to the area and around the state which ultimately led to enhancements of PM_{2.5} concentrations that exceeded the NAAQS level.

Canadian wildfires during the 2023 wildfire season were well documented and impacted much of the geography of the United States. This season started ahead of the typical Canadian wildfire season, lasting from mid-April to late October (seasons usually are from May − September)¹. Temperatures and land aridity across Canada were unusually high and resulted in the burning of a record-breaking amount of land area (≥156,000 km²)². The land area burned during this season far exceeded the average³ of 21,000 km², with the most active burns situated in the eastern province of Quebec in June and July.

Figures in Appendix A are provided to show active Canadian wildfires on the days of the exceedances and for three days beforehand via the Natural Resources Canada Interactive Map⁴. On June 29 and July 17, 2023 (Figures A1 and A2), when the exceedance was recorded by the relevant monitor, Canadian wildfires were on-going across the country, the majority of which had each consumed >1,000 hectares. These fires were similarly as intense up to three days prior to the recorded exceptional events.

Shown in Section 4, these wildfires resulted in the United States being blanketed in smoke and impacted $PM_{2.5}$ surface level concentrations across the country. Pertinent to this demonstration, concentrations were impacted across the southeast of the country, often simultaneously and in conjunction with the arrival of air masses either from Canada or circulated from smoke-laden areas

¹ https://doi.org/10.1038/s41467-024-51154-7

² https://doi.org/10.1007/s00376-023-3241-0

³ https://cwfis.cfs.nrcan.gc.ca/ha/nfdb

⁴ https://cwfis.cfs.nrcan.gc.ca/interactive-map

within the United States. Air mass back-trajectories from NOAA's HYSPLIT model indicate that the plumes responsible for the summertime exceedances were emitted either from fires in Quebec or fires in the western provinces (British Columbia, Alberta, and Saskatchewan), and were generally transported across the Midwest of the United States.

The conceptual model describes how emissions from wildfires in Canada and environmental conditions contributed to the wildfire events dated in Table 1. Smoke emissions enhanced PM_{2.5} concentrations observed by the monitor as they were transported to the FS8 site and caused an exceedance of the annual PM_{2.5} NAAQS. Georgia EPD requests EPA's concurrence on June 29 and July 17, 2023, for exclusion from regulatory decision making, specifically state attainment determinations.

3. Public Notification

As described in 40 CFR 51.930(a), states requesting to exclude data due to exceptional events must take appropriate and reasonable actions to protect public health from exceedances or violations of the NAAQS. These include providing for, at a minimum, prompt public notification whenever concentrations are expected to exceed a NAAQS, public education on actions individuals may take to reduce exposures to unhealthy air quality during events, and implementation of appropriate measures to protect public health from event-caused exceedances or violations of the NAAQS.

With respect to public notification and public education, the Georgia Forestry Commission (GFC) has a public website⁵ with an interactive wildfire and burn permit map that contains the current Air Quality Index at all monitors in Georgia with the option to add the following layers: (1) burn restrictions, (2) daily burn permits, (3) PM_{2.5}, (4) NOAA Hazard Mapping System (HMS) smoke plumes, (5) wind vectors, and (6) smoke forecast. The public can zoom in to see if smoke may impact their location. The Georgia EPD website⁶ has a link to the GFC interactive burn permit map. Also, the Georgia EPD website has a link to EPA's AirNow Fire and Smoke Map⁷, EPA's AirNow When Smoke is in the Air⁸, EPA's AirNow Prepare for Fire Season⁹, and the EPA's Smoke-Ready Toolbox for Wildfires¹⁰. These websites identify several protective measures that individuals should take to reduce smoke exposure as needed, including limiting outdoor activities, avoiding strenuous outdoor activity and remaining indoors, and considering temporarily relocating or closing all doors and windows during smoke events. In addition, the Georgia EPD Ambient Air Monitoring Program website¹¹ provides near real-time ambient air concentrations of multiple criteria pollutants (O₃, PM_{2.5}, SO₂, NO₂, and CO) across the state.

Outside Georgia EPD and GFC, there was additional notification provided by various news outlets to the public about the potential for elevated air quality impacts from Canadian Wildfires. Some examples include:

⁵ https://georgiafc.firesponse.com/public/

⁶ https://epd.georgia.gov/air-protection-branch/open-burning-rules-georgia

⁷ https://fire.airnow.gov/

⁸ https://www.airnow.gov/wildfires/when-smoke-is-in-the-air/

⁹ https://www.airnow.gov/sites/default/files/2020-10/prepare-for-fire-season.pdf

¹⁰ https://www.epa.gov/air-research/smoke-ready-toolbox-wildfires

¹¹ https://airgeorgia.org/

- https://www.wsbtv.com/news/local/atlanta/expect-flight-delays-into-atlanta-thanks-canada-wildfire-smoke/RX2WTAWHTBGEVGQAMWFRLYCEJU/ (North Georgia/Metro Atlanta, 6/7/2023)
- https://www.13wmaz.com/article/weather/smoke-from-wildfire-to-central-georgia/93-87f7b552-98fd-4b86-8f99-94140c76d38d (Macon/Central Georgia, 6/7/2023)
- https://www.youtube.com/watch?v=sZkxex_jpQw (Central Georgia, 6/7/2023)
- https://www.wsbradio.com/weather/wildfire-smoke-drifting-south-canada-into-north-georgia/OKNENTCA6JGGJPYQ76VCO6LF5Q/ (Metro Atlanta/Birmingham, Alabama, 6/7/2023)
- https://www.gpb.org/news/the-picture-show/2023/06/07/photos-extreme-canadian-wildfire-smoke-shrouds-parts-of-us (North and South Carolina, 6/7/2023)
- https://www.atlantanewsfirst.com/2023/06/08/air-quality-georgia-will-smoke-wildfires-reach-us/ (Greater Metro Atlanta, 6/8/2023)
- https://patch.com/georgia/atlanta/code-orange-alert-what-know-air-quality-ga (Atlanta, 6/8/2023)
- https://www.walb.com/2023/06/08/canadian-wildfire-smoke-arrives-south-ga-effects-are-minimal/ (Albany/South Georgia, 6/8/2023)
- https://abcnews.go.com/US/canadian-wildfire-dangers-prompt-proactive-mitigation-government-experts/story?id=100478859 (Predicts plume will migrate to Georgia, 7/1/2023)
- https://www.11alive.com/article/weather/stormtracker/wildfire-smoke-north-georgia/85-b4670fee-4608-4f99-9904-bbdbcf924375 (North Georgia, 7/17/2023)
- https://foxchattanooga.com/weather/stormtrack-9-blog/canadian-wildfire-smoke-impacts-tennessee-georgia-air-quality-once-again (Chattanooga, 7/17/2023)
- https://www.nytimes.com/2023/07/18/us/smoke-wildfires-nc-georgia.html (Georgia, 7/18/2023)
- https://www.fox5atlanta.com/news/code-orange-alert-metro-atlanta-canadian-wildfire-smoke (Georgia, 7/18/2023)
- https://www.atlantanewsfirst.com/2023/07/18/canadian-wildfires-bring-poor-air-quality-north-georgia (Metro Atlanta/North Georgia, 7/18/2023)
- https://www.cnn.com/2023/07/17/weather/canada-wildfires-shatter-burning-records/index.html (North Georgia, 7/18/2023)
- https://www.igair.com/us/newsroom/atlanta-air-quality-alert (Atlanta 7/18/2023)
- https://www.houstonchronicle.com/news/houston-texas/environment/article/houston-pollution-canadian-wildfire-saharan-dust-18206844.php (Atlanta/Georgia, 7/18/2023)
- https://www.wsfa.com/2023/07/18/details-behind-canadian-wildfire-smoke-alabamas-sky/ (Montgomery/Alabama, 7/18/2023)
- https://news.gatech.edu/news/2023/07/19/canadian-wildfire-smoke-affects-atlanta-2 (Atlanta, 7/19/2023)
- https://www.gpb.org/news/2023/07/26/macon-had-georgias-worst-air-quality-last-week-thanks-canadian-wildfires-heat-dome (Macon, 7/26/2023)
- https://www.savannahnow.com/story/weather/2023/10/03/savannah-ga-air-quality-canadian-wildfire-smoke-moves-down-u-s-coast/71045920007/ (Savannah, 10/3/2023)
- https://www.gpb.org/news/2023/10/04/have-you-noticed-haze-in-the-air-heres-why-georgia-dealing-smoke (South/Middle Georgia, 10/4/2023)

4. Clear Causal Relationship and Supporting Analyses

This section addresses the EER requirements at 40 CFR 50.14(c)(3)(iv)(B) by showing that the events affected air quality in such a way that there exists a clear, causal relationship between the specific events and the monitored exceedance, and at 40 CFR 50.14(c)(3)(iv)(C) by providing analyses comparing the claimed event-influenced concentrations to concentrations at the same monitoring site at other times. The *Guidance on the Preparation of Exceptional Events Demonstrations for Wildfire Events that May Influence Ozone Concentrations* and *PM*_{2.5} *Wildland Fire Exceptional Events Tiering Document* outline the expected components of a clear causal relationship portion of a demonstration. These include a comparison of the event-related concentration to historical concentrations, evidence that the emissions from wildfires were transported to the monitor, and evidence that the prescribed fire emissions affected the monitor. Figures B1 and B2 (Appendix B) show smoke from the NOAA HMS, plotted via the AirNow Navigator¹². Active fires and smoke are shown for the dates the event was registered as well as up to three days beforehand. For each exceptional event, smoke pervaded the air throughout much of the eastern half of the United States, if not the entire country.

The historical data analysis section of this demonstration focuses on 2019-2023 PM_{2.5} FRM data at the FS8 site monitor. Table 3 contains a comparison of exceptional event concentrations to historic 2019-2023 concentrations for the monitor. Generally, the exceptional event concentrations are at least quadruple the 5-year annual average, quarterly average, and monthly average, and in some cases can more than 4.5 times higher.

Table 3. Comparison of exceptional event concentrations to historic 2019-2023 concentrations at the Fire Station #8 site monitor (AQS ID: 13-121-0039).

EE Date	EE	5-Year	5-Year	5-Year	Ratio	Ratio EE	Ratio
	Concentration	Annual	Quarterly	Monthly	EE to	to 5-Year	EE to
	(μg/m ³)	Average (μg/m ³)	Average (μg/m³)	Average (μg/m ³)	5-Year Annual	Quarterly Average	5-Year Monthly
		, 0	(10)	, 0	Average	0	Average
6/29/2023	39.2	8.9	9.04	10.26	4.4	4.3	3.8
7/17/2023	41.5	8.9	9.62	10.79	4.7	4.3	3.8

Figure 1 plots the 24-hour $PM_{2.5}$ concentrations for 2019-2023. Exceedances caused by wildfires or prescribed burns are delineated by marker shape. Concentrations generally fall within the Tier 3 range, below 15.1 $\mu g/m^3$, except when smoke from wildfires is present. All the selected exceptional events days are above the Tier 1 threshold of 22.65 $\mu g/m^3$, making them 1.5 times greater than the highest 98th percentile of data over the last 5 years per the EPA's Tiering Tool.

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¹² https://airnowtech.org/navigator/

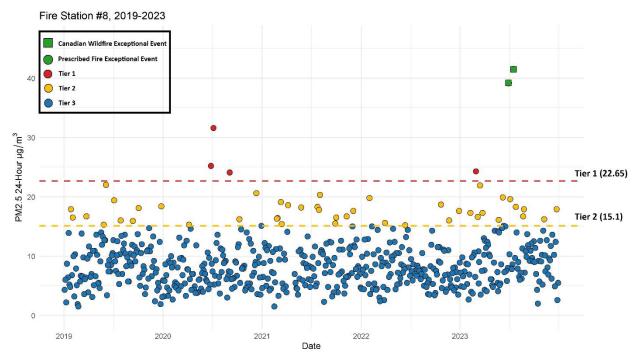


Figure 1. 24-hour PM_{2.5} concentrations for 2019-2023 observed at the Fire Station #8 site.

Maps from the AirNow Navigator are provided in Appendix C for each exceedance event in Table 3. The maps include NOAA HMS satellite detected fires, HMS smoke plumes, 24-hour PM_{2.5} concentrations across the United States, and HYSPLIT back-trajectories. These trajectories originate at the FS8 monitor's geographic location and extend 72 hours back in time. Three different starting times were modeled with HYSPLIT for each day: (1) midnight at the start of the exceedance day, (2) noon of the exceedance day, and (3) midnight at the end of the exceedance day. Each trajectory starts at a different elevation above ground level (100 m, 1500 m, and 3000 m). The 1500 m and 3000 m tails are used to estimate the trajectories of smoke transported over a long range. The 100 m tail, nearer to the surface, is used to show local transport. Additionally, these values are chosen to estimate vertical transport near-surface and up to several hundred meters above the planetary boundary layer. Figures in Appendix D are provided to show ground level, daily PM_{2.5} concentrations, and air quality indices (AQIs) in the southeast of the United States. Figures in Appendix E show PM_{2.5} concentration time series for both the event day and the day before. As Fire Station #8 only provides 24-hour PM_{2.5} measurements, the Near Road – Georgia Tech monitor (AQS ID: 13-121-0056) is used to show when smoke impacted hourly PM_{2.5} concentrations in the Atlanta area. The Near Road – Georgia Tech site is located 3 miles southeast of the Fire Station #8 site. Figures B1 and B2 show that both sites are covered by the same smoke plume on the event days.

June 29, 2023

Fires in Canada had been on-going for months at the time the exceedance was measured, and their emissions were likely mixed throughout the air column. From Figure E1, $PM_{2.5}$ concentrations were elevated above the 9.0 $\mu g/m^3$ standard around 3:00 PM ET on June 28 and remained elevated throughout the event day. Shown in Figure C1, back-trajectories indicate that the smoke plume traveled through the Midwest of the United States. As a result, the plume detected by the monitor is a mixture of emissions from fires in provinces of British Columbia,

Alberta, Saskatchewan, Ontario, and Quebec. The back-trajectories converge in space approximately 18-24 hours before descending to near-surface level where observed, the daily $PM_{2.5}$ concentration at the FS8 site on June 29, 2023, increased to 39.2 $\mu g/m^3$. Figure D1 shows that this enhancement occurred synchronously with elevated concentrations reported by monitors across the southeast, which follows from the large blanket of smoke over this region (Figure B1).

July 17, 2023

Fires in Canada had been on-going for months at the time the exceedance was measured, and their emissions were likely mixed throughout the air column. From Figure E2, $PM_{2.5}$ concentrations were elevated above the $9.0~\mu g/m^3$ standard around 4:00~PM ET on July 16 and remained elevated throughout the event day. Shown in Figure C2, back-trajectories indicate that the smoke plume traveled through the Midwest of the United States. As a result, the plume detected by the monitor is most likely a mixture of emissions from fires in provinces of British Columbia, Alberta, and Saskatchewan. The back-trajectories converge in space approximately 12 hours before descending to near-surface level where observed, the daily $PM_{2.5}$ concentration at the FS8 site on July 17, 2023, increased to $41.5~\mu g/m^3$. Figure D2 shows that this enhancement occurred synchronously with elevated concentrations reported by monitors across the southeast, which follows from the large blanket of smoke over this region (Figure B2).

The comparisons and analyses, provided here in this demonstration support the Georgia EPD's position that the fire 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 for the dates described in Table 1 and thus satisfies the clear causal relationship criterion.

5. Not reasonably Controllable or Preventable

This section satisfies the EER requirements at 40 CFR 50.14(c)(3)(iv)(A), CFR 50.1(j), 40 CFR 50.14(c)(3)(iv)(D), and 40 CFR 50.14(b)(4): The event was caused by a natural event; an exceptional event is one that is not reasonably controllable or preventable. Stated in section 40 CFR 50.14 (a)(8)(vii), the Administrator shall not require a State to provide case-specific justification to support the not reasonably controllable or preventable criterion for emissions-generating activity that occurs outside of the State's jurisdictional boundaries within which the concentration at issue was monitored.

6. Human Activity Unlikely to Recur at a Particular Location or Natural Event

This section satisfies the EER requirement at 40 CFR 50.14(c)(3)(iv)(E): A demonstration that the event was a human activity that is unlikely to recur at a particular location or was a natural event. The definition of wildfire in the EER is: "...any fire started by an unplanned ignition caused by lightning; ... A wildfire that predominately occurs on wildland is a natural event." As stated in sections 2 and 4, the origin and evolution of the 2023 Canadian wildfires occurred across Canada.

Based on the documentation provided in sections 2 and 4 of this demonstration, these events qualify as natural events as they spread uncontrolled through remote, natural (i.e., non-agricultural) lands. The National Aeronautics and Space Administration (NASA) noted that many of the Canadian fires were ignited by summer lightning storms and

largely burned in deeply wooded areas. The EPA generally considers the emissions of $PM_{2.5}$ from wildfires to meet the regulatory definition of a natural event, defined as one "in which human activity plays little or no direct causal role" (40 CFR 50.1(k)). As the Georgia EPD has shown that the demonstrated exceedances resulted from natural events, they should be considered for treatment as exceptional events.

7. Public Comment Period

The Georgia EPD held a 30-day public comment period starting on December 20, 2024, to receive public input regarding the Exceptional Event Demonstration. Notification of the public comment period was posted on the Georgia EPD website and emailed to interested stakeholders. Public comments received are included in Appendix G of this demonstration, along with the Georgia EPD's responses to these comments in Appendix H.



Figure A1. Active wildfires in Canada on June 26-29, 2023.

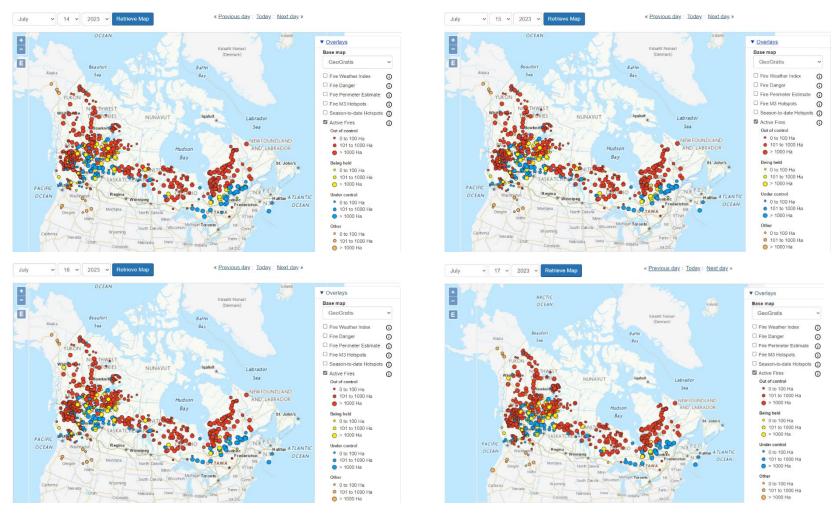


Figure A2. Active wildfires in Canada on July 14-17, 2023.

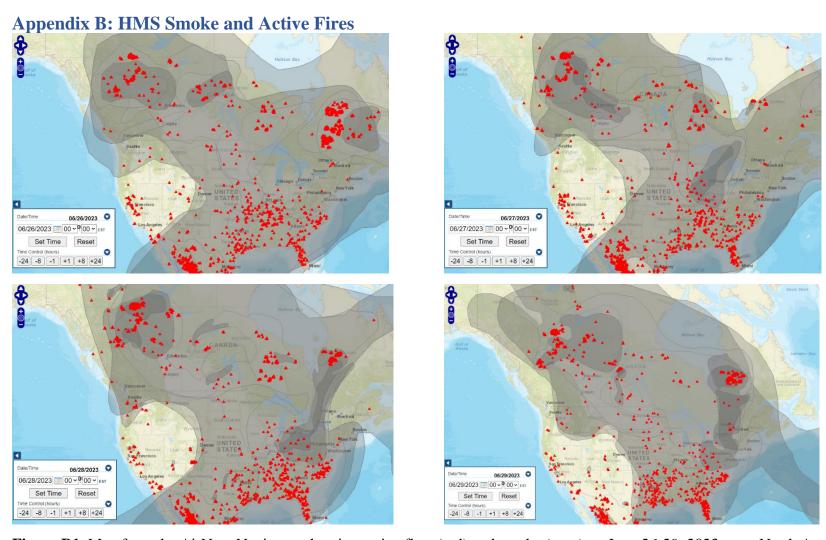


Figure B1. Map from the AirNow Navigator showing active fires (red) and smoke (grey) on June 26-29, 2023, over North America.

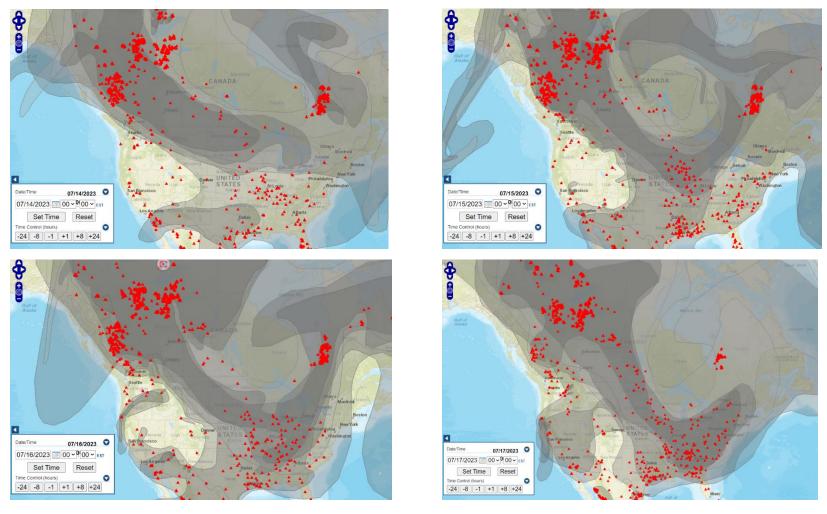


Figure B2. Map from the AirNow Navigator showing active fires (red) and smoke (grey) on July 14-17, 2023, over North America.

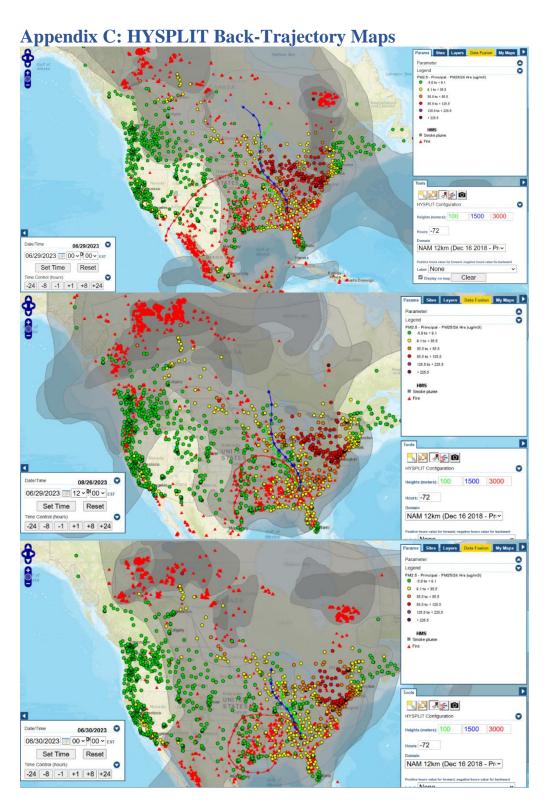


Figure C1. Map of HMS smoke plumes (grey polygons) and fires (red triangles), daily PM_{2.5} concentrations (circles), and HYSPLIT back-trajectories of release heights at 100 m (green lines), 1500 m (blue lines), and 3000 m (red lines) for 0 AM EST on June 29, 2023 (top), 12 PM EST on June 29, 2023 (middle), and 0 AM EST on June 30, 2023 (bottom).

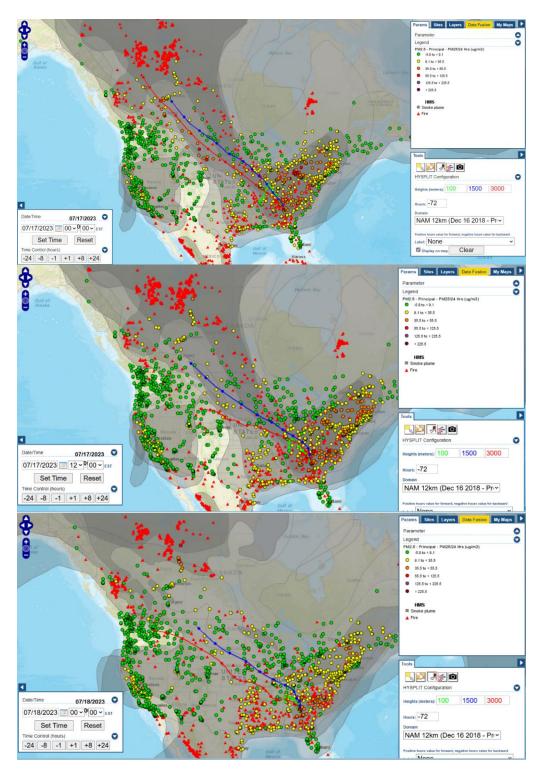
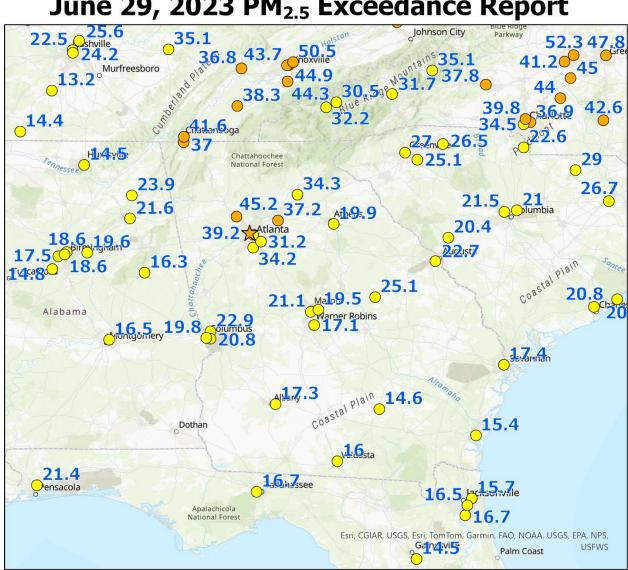


Figure C2. Map of HMS smoke plumes (grey polygons) and fires (red triangles), daily PM_{2.5} concentrations (circles), and HYSPLIT back-trajectories of release heights at 100 m (green lines), 1500 m (blue lines), and 3000 m (red lines) for 0 AM EST on July 17, 2023 (top), 12 PM EST on July 17, 2023 (middle), and 0 AM EST on July 18, 2023 (bottom).

Appendix D: PM_{2.5} Surface Concentrations in the Southeast

June 29, 2023 PM_{2.5} Exceedance Report

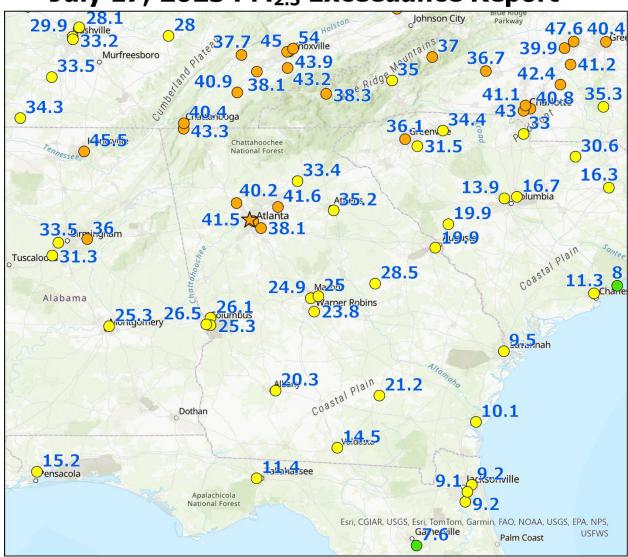


AQI category - 24-hr average PM_{2.5}

- Good (0-9 ug/m³)
- Moderate (9.1-35.4 ug/m³)
- Unhealthy for sensitive (35.5-55.4 ug/m³)
- Unhealthy (55.5-150.4 ug/m³)
- Very unhealthy (150.4-250.4 ug/m³)
- Hazardous (>250.4 ug/m³)

Figure D1. Surface level, daily PM_{2.5} concentrations on June 29, 2023, across the southeast. The Fire Station #8 monitoring site is represented by a star. Numerous sites measured concentrations that exceeded the level of annual PM_{2.5} NAAQS.

July 17, 2023 PM_{2.5} Exceedance Report



AQI category - 24-hr average PM_{2.5}

- Good (0-9 ug/m³)
- Moderate (9.1-35.4 ug/m³)
- Unhealthy for sensitive (35.5-55.4 ug/m³)
- Unhealthy (55.5-150.4 ug/m³)
- Very unhealthy (150.4-250.4 ug/m³)
- Hazardous (>250.4 ug/m³)

Figure D2. Surface level, daily $PM_{2.5}$ concentrations on July 17, 2023, across the southeast. The Fire Station #8 monitoring site is represented by a star. Numerous sites measured concentrations that exceeded the level of annual $PM_{2.5}$ NAAQS.

Appendix E: Hourly PM_{2.5} Time Series

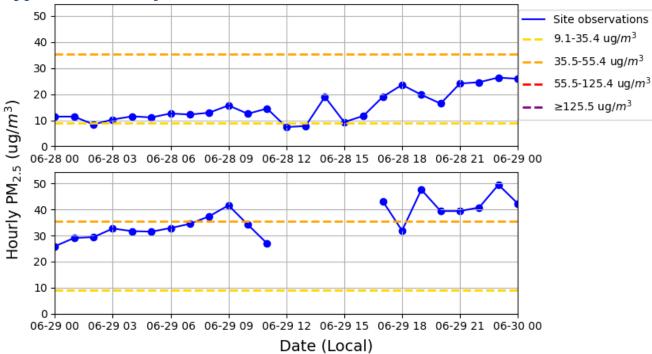


Figure E1. Hourly PM_{2.5} concentrations at the Near Road – Georgia Tech site (a proxy for Fire Station #8) on June 28 and 29, 2023. The solid blue lines with dots show observations. The dashed lines show AQI breakpoints.

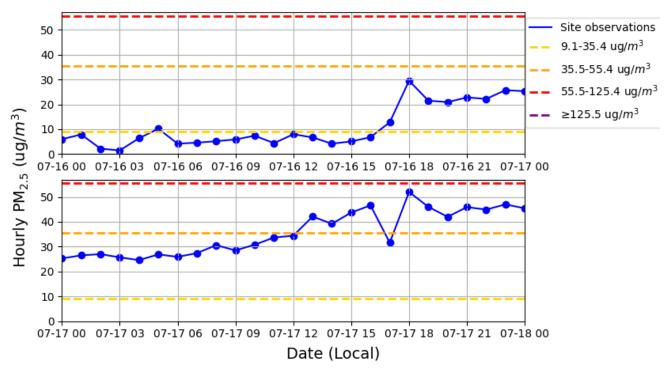


Figure E2. Hourly PM_{2.5} concentrations at the Near Road – Georgia Tech site (a proxy for Fire Station #8) on July 16 and 17, 2023. The solid blue lines with dots show observations. The dashed lines show AQI breakpoints.

Appendix G: Public Comments

Appendix H: Responses to Public Comments