

DRAFT Canadian Wildfire Exceptional Event Demonstration for the 2024 Annual PM_{2.5} NAAQS at Augusta, GA in 2022-2024

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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. For the purpose of this document, an "exceedance" is defined as a measured 24-hour $PM_{2.5}$ concentration that is greater than the level (9.0 $\mu g/m^3$) of the 2024 annual $PM_{2.5}$ NAAQS. Please note that "exceedance" as defined in this document (based on an averaging time of 24-hours) is <u>not</u> an actual exceedance of the 2024 annual $PM_{2.5}$ NAAQS since an exceedance of a NAAQS must be based on the averaging time for the NAAQS (in this case, annual) in addition to the level of the NAAQS (in this case, 9.0 $\mu g/m^3$).

From 2019 through 2024, one FEM monitor collected data at the Augusta site (Air Quality System (AQS) ID: 13-245-0091). In addition, in 2022, two collocated FRMs began collecting data. The primary monitor operated on a one-in-three day schedule from January 2022 to August 2022, and then on a daily schedule starting August 2022. The collocated FRM monitor collected data on a one-in-three-day schedule starting September 2022. In addition, the FEM had a NAAQS exclusion starting in January 2022. Through 2024, the two collocated FRMs continued to collect data, with a daily schedule for the primary monitor and one-in-three-day schedule for the collocated monitor, and the FEM monitor continued to collect data with a NAAQS exclusion through 2024. The Augusta-Richmond County, GA-SC Metropolitan Statistical Area (MSA) is in attainment of the 2012 PM_{2.5} NAAQS.

This exceptional event demonstration for the Augusta air monitoring site (AQS ID: 13-245-0091) located in Augusta (Richmond County) in the state of Georgia discusses 20 different days from 2022-2024 that qualify for exceptional event demonstrations (Table 1), 10 of which were due to Canadian wildfires. These 10 exceedances resulted from the transport of wildfire smoke that originated in Canada; therefore, they qualify for removal under the Exceptional Events Rule (EER). Design values (DVs) of the Augusta monitor with and without U.S. Environmental Protection Agency (EPA) concurrence are shown in Table 2. This demonstration will focus on the 10 Canadian wildfire events, while a separate demonstration will focus on the 10 prescribed fire events. DVs are calculated using 24-hour PM_{2.5} measurements from 2022-2024. 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 9.2 µg/m³, which violates the new 2024 PM_{2.5} annual NAAQS; however, exclusion reduces the DV to 9.0 µg/m³.

On July 30, 2025, the Georgia Environmental Protection Division (EPD) submitted an Initial Notification for these events to EPA. The request indicated that 10 events identified in Table 1 were 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). Georgia EPD formally requests that the EPA concur with the exclusion of these events.

Table 1. Exceedances observed at the Augusta site stationed in Augusta, GA in 2022-2024 that

qualify for removal under the EER.

#	Date	24-hour PM _{2.5} (µg/m ³) Tier Cause of		Cause of Exceedance	
1	03/03/22	25.3	1	Prescribed fires	
2	03/01/23	25.6	1	Prescribed fires	
3	03/06/23	19.2	1	Prescribed fires	
4	03/16/23	22.3	1	Prescribed fires	
5	06/08/23	19.8	1	Canadian Wildfires	
6	06/09/23	20.2	1	Canadian Wildfires	
7	06/10/23	22.8	1	Canadian Wildfires	
8	06/18/23	23.2	1	Canadian Wildfires	
9	06/29/23	22.7	1	Canadian Wildfires	
10	06/30/23	26.4	1	Canadian Wildfires	
11	07/01/23	20.3	1	Canadian Wildfires	
12	07/17/23	19.9	1	Canadian Wildfires	
13	07/18/23	26.3	1	Canadian Wildfires	
14	07/19/23	19.1	1	Canadian Wildfires	
15	02/01/24	22.3	1	Prescribed fires	
16	02/22/24	24.6	1	Prescribed fires	
17	03/13/24	23.9	1	Prescribed fires	
18	03/14/24	27.9	1	Prescribed fires	
19	03/21/24	23.8	1	Prescribed fires	
20	04/25/24	25.2	1	Prescribed fires	

Table 2. Design values at the Augusta site for the 2024 annual PM_{2.5} NAAQS.

	Monitor Site	2022-2024 DV without EPA	2022-2024 DV with EPA
	(AQS ID)	Concurrence (µg/m³)	Concurrence (μg/m³)
Ī	Augusta (13-245-0091)	9.3	9.0

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 EER requires that demonstrations include a narrative conceptual model describing the events. This section describes the 2023 Canadian wildfires that impacted air quality monitors in Augusta, GA. Estimates from the National Oceanic and Atmospheric Administration (NOAA) Hybrid Single-Particle Lagrangian Integrated Trajectory model (HYSPLIT) model are used to describe the transport 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 are usually 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 ($\geq 156,000 \text{ km}^2$)². The land area burned during this season far exceeded the average of 21,000 km² ³, 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 dates listed in Table 1 (Figures A1-A10), when the exceedances were recorded at the relevant site, 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 within the United States. Air mass back-trajectories from NOAA's HYSPLIT model indicate that the plumes responsible for the summertime events were emitted from fires in the Canadian provinces of British Columbia, Alberta, Saskatchewan, and Quebec. They then traveled along multiple routes either originating in Canada or by circulating smoke from Canadian wildfires from other (western and/or midwestern) regions of the United States.

This conceptual model describes how emissions from wildfires in Canada and environmental conditions contributed to the events dated in Table 1. Smoke emissions transported to the Augusta site enhanced observed PM_{2.5} concentrations and caused an exceedance. Georgia EPD requests the EPA's concurrence for the dates listed in Table 1 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.

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

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:

- 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)

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/

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.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.iqair.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-B10 (Appendix B) shows smoke from the NOAA Hazard Mapping System (HMS), plotted via the AirNow Navigator¹². Active fires and smoke are shown for the day the event was registered as well as up to three days beforehand. During the exceptional events, smoke pervaded the air throughout much of the eastern half of the United States, if not the entire country.

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¹² https://airnowtech.org/navigator/

The historical data analysis section of this demonstration focuses on 2020-2024 PM_{2.5} FRM data at the Augusta site. Table 3 contains a comparison of exceptional event concentrations to historic 2020-2024 concentrations for the site. Generally, the exceptional event concentrations are at least double the 5-year annual average, quarterly average, and monthly average, and in some cases can be nearly three times higher.

Table 3. Comparison of exceptional event concentrations to historic 2020-2024 concentrations at the Augusta site.

EE Date	EE Concentration (μg/m³)	5-Year Annual Average (μg/m³)	5-Year Quarterly Average (μg/m³)	5-Year Monthly Average (μg/m³)	Ratio EE to 5-Year Annual Average	Ratio EE to 5-Year Quarterly Average	Ratio EE to 5-Year Monthly Average
06/08/23	19.8	9.3	9.43	10.14	2.1	2.1	2.0
06/09/23	20.2	9.3	9.43	10.14	2.2	2.1	2.0
06/10/23	22.8	9.3	9.43	10.14	2.4	2.4	2.2
06/18/23	23.2	9.3	9.43	10.14	2.5	2.5	2.3
06/29/23	22.7	9.3	9.43	10.14	2.4	2.4	2.2
06/30/23	26.4	9.3	9.43	10.14	2.8	2.8	2.6
07/01/23	20.3	9.3	9.07	9.18	2.2	2.2	2.2
07/04/23	20.6	9.3	9.07	9.18	2.2	2.3	2.2
07/17/23	19.9	9.3	9.07	9.18	2.1	2.2	2.2
07/18/23	26.3	9.3	9.07	9.18	2.8	2.9	2.9

Figure 1 plots the 24-hour $PM_{2.5}$ concentrations for 2020-2024. Exceedances caused by wild or prescribed fires are delineated by marker shape. The selected exceptional events are above the Tier 1 threshold of 17.4 $\mu g/m^3$, making them 1.5 times greater than the highest 98^{th} percentile of data over the last 5 years, per the EPA's Tiering Tool.

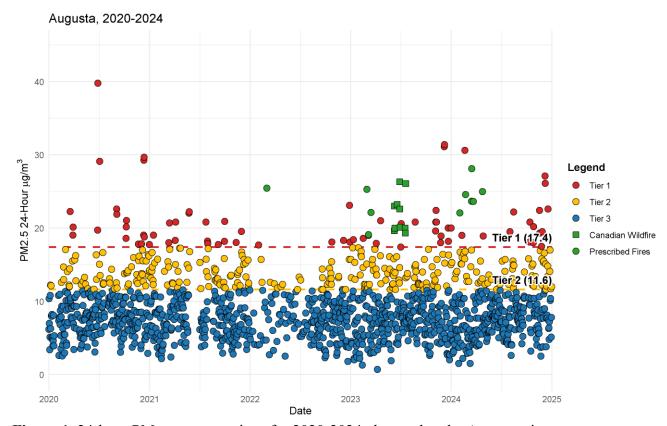


Figure 1. 24-hour PM_{2.5} concentrations for 2020-2024 observed at the Augusta site. Exceedances not related to fires are demarcated by color with Tier 1 in red, Tier 2 in yellow, and Tier 3 in blue. Canadian wildfires (green squares) and prescribed burns (green circles) are additionally differentiated.

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 rolling average PM_{2.5} concentrations (including the time shown in the figure panel and the 23 hours following it) across the United States, and HYSPLIT back-trajectories. These trajectories originate at the Augusta site'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 hourly PM_{2.5} time series for both the event day and the day before. Figures in Appendix F show upper air maps from the Storm Prediction Center¹³ for July 19 and three days prior. Maps are displayed at pressures of either

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¹³ https://www.spc.noaa.gov/obswx/maps/

850 millibar (mb), equivalent to 1170-1590 m above mean sea level (MSL), or 700 mb, equivalent to 2350-3150 m MSL¹⁴, at 00 Coordinated Universal Time (UTC) or 12 UTC for each day. These pressure values are chosen to correspond with the 1500 m and 3000 m heights of the HYSPLIT trajectories. A specific pressure value is determined on a case-by-case basis depending on how clearly the corresponding upper air maps explain the sequence of events that led to the relevant exceedance.

June 8, 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 throughout the event day and the day prior. 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 at the site is a mixture of emissions from fires in the provinces of British Columbia, Alberta, Saskatchewan, and Quebec. Daily $PM_{2.5}$ concentrations increased to 19.8 $\mu g/m^3$. Figure D1 shows that similar enhancements occurred synchronously at other monitoring sites across the southeast, which follows from the large blanket of smoke over this region (Figure B1).

June 9, 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 throughout the event day and the day prior. 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 at the site is a mixture of emissions from fires in the provinces of British Columbia, Alberta, Saskatchewan, and Quebec. Daily $PM_{2.5}$ concentrations increased to 20.2 $\mu g/m^3$. Figure D2 shows that similar enhancements occurred synchronously at other monitoring sites across the southeast, which follows from the large blanket of smoke over this region (Figure B2).

June 10, 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 E3, $PM_{2.5}$ concentrations were elevated above the $9.0~\mu g/m^3$ standard throughout the event day and the day prior. Shown in Figure C3, back-trajectories indicate that the smoke plume traveled through the Midwest and northeast regions of the United States. As a result, the plume detected at the site is a mixture of emissions from fires in the provinces of British Columbia, Alberta, and Quebec. The back-trajectories converge approximately 12 hours before descending to near-surface level where observed, daily $PM_{2.5}$ concentrations increased to $22.8~\mu g/m^3$. Figure D3 shows that similar enhancements occurred synchronously at other monitoring sites across the southeast, which follows from the large blanket of smoke over this region (Figure B3).

June 18, 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 E4, $PM_{2.5}$ concentrations were elevated above the 9.0 $\mu g/m^3$ standard throughout the event day and the day

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¹⁴ https://www.noaa.gov/jetstream/upper-air-charts

prior. Shown in Figure C4, back-trajectories indicate that the smoke plume traveled through the Midwest region of the United States. As a result, the plume detected at the site is a mixture of emissions from fires in the provinces of Saskatchewan and Quebec. The back-trajectories converge approximately 6 hours before descending to near-surface level where observed, daily $PM_{2.5}$ concentrations increased to 23.2 $\mu g/m^3$. Figure D4 shows that similar enhancements occurred synchronously at other monitoring sites across the southeast, which follows from the large blanket of smoke over this region (Figure B4).

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. $PM_{2.5}$ concentrations were elevated above the $9.0~\mu g/m^3$ standard throughout the event day and the day prior. Shown in Figure C5, back-trajectories indicate that the smoke plume traveled through the Midwest region of the United States. As a result, the plume detected at the site is a mixture of emissions from fires in the provinces of British Columbia, Alberta, and Quebec. The back-trajectories converge approximately 18 hours before descending to near-surface level where observed, daily $PM_{2.5}$ concentrations increased to $22.7~\mu g/m^3$. Figure D5 shows that similar enhancements occurred synchronously at other monitoring sites across the southeast, which follows from the large blanket of smoke over this region (Figure B5).

June 30, 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 E6, $PM_{2.5}$ concentrations were elevated above the $9.0~\mu g/m^3$ standard throughout the event day and the day prior. Shown in Figure C6, back-trajectories indicate that the smoke plume traveled through the southwest and Midwest regions of the United States. The trajectories traverse the United States and originate far from the active fires. Canadian wildfire smoke was circulated from regions in the United States to the west of Georgia. As a result, the plume detected at the site is a mixture of emissions from fires in the provinces of British Columbia, Alberta, Saskatchewan, and Quebec. The back-trajectories converge approximately 18 hours before descending to near-surface level where observed, daily $PM_{2.5}$ concentrations increased to 26.4 $\mu g/m^3$. Figure D6 shows that similar enhancements occurred synchronously at other monitoring sites across the southeast, which follows from the large blanket of smoke over this region (Figure B6).

July 1, 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 E7, $PM_{2.5}$ concentrations were elevated above the $9.0~\mu g/m^3$ standard throughout the event day and the day prior. Shown in Figure C7, back-trajectories indicate that the smoke plume traveled through the southern and Midwest regions of the United States. The trajectories traverse across the United States and originate far from the active wildfires. Canadian wildfire smoke was likely circulated to Georgia from states to the west. As a result, the plume detected at the site is a mixture of emissions from fires in the provinces of British Columbia, Alberta, Saskatchewan, and Quebec. Daily $PM_{2.5}$ concentrations increased to $20.3~\mu g/m^3$. Figure D7 shows that similar enhancements occurred synchronously at other monitoring sites across the southeast, which follows from the large blanket of smoke over this region (Figure B7).

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 E8, $PM_{2.5}$ concentrations were elevated above the 9.0 $\mu g/m^3$ standard around 7:00 PM EST on June 16 and remained elevated throughout the event day. Shown in Figure C8, back-trajectories indicate that the smoke plume traveled from the northwest corner of Canada through the Midwest of the United States. As a result, the plume detected at the site is a mixture of emissions from fires in the provinces of British Columbia, Alberta, and Saskatchewan. The back-trajectories converge approximately one day before descending to near-surface level where observed, daily $PM_{2.5}$ concentrations increased to 19.9 $\mu g/m^3$. Figure D8 shows that similar enhancements occurred synchronously at other monitoring sites across the southeast, which follows from the large blanket of smoke over this region (Figure B8).

July 18, 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 E9, PM_{2.5} concentrations were elevated above the 9.0 μg/m³ standard throughout the event day and the day prior. Shown in Figure C9, back-trajectories indicate that the smoke plume traveled through the northwest and Midwest regions of the United States. As a result, the plume detected at the site is a mixture of emissions from fires in the provinces of British Columbia, Alberta, and Saskatchewan. The back-trajectories converge approximately 12 hours before descending to near-surface level where observed, daily PM_{2.5} concentrations increased to 26.3 μg/m³. Figure D9 shows that similar enhancements occurred synchronously at other monitoring sites across the southeast, which follows from the large blanket of smoke over this region (Figure B9).

July 19, 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 E10, PM_{2.5} concentrations were elevated above the 9.0 µg/m³ standard throughout the event day and the day prior. Shown in Figure C10, back-trajectories indicate that the smoke plume traveled from the northwest corner of Canada through the Midwest of the United States. Wildfires were active largely in western Canada at this time. Wind barbs from Figures F1-F4 (spanning a timeframe of July 16-19) show a large-scale, southeastward transport of air masses from the northwest coast to the southeast coast, indicating emissions from these fires were directed along this path. Throughout July 18 and 19 (Figures F3-F4), wind barbs detail a clockwise vortex that covered parts of the southwest and southeast, which corroborates the back-trajectory of the 3000-m HYSPLIT tail. Therefore, wildfire smoke traveled from western Canada, was circulated over the south of the country, and ultimately arrived at the Augusta monitoring site. As a result, the plume detected at the site is a mixture of emissions from fires in the provinces of British Columbia, Alberta, and Saskatchewan. The back-trajectories converge approximately one day before descending to near-surface level where observed, daily PM_{2.5} concentrations increased to 26.3 µg/m³. Figure D10 shows that similar enhancements occurred synchronously at other monitoring sites across the southeast, which follows from the large blanket of smoke over this region (Figure B10).

The comparisons and analyses, provided in this demonstration support 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 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; accidental, human causes actions, or a prescribed fire that has developed into a wildfire. A wildfire that predominately occurs on wildland is a natural event." As stated in sections 2 and 4, the origin and evolution of the wildfires described in this demonstration occurred in 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 or silvicultural) lands. The National Aeronautics and Space Administration noted that many of the Canadian fires were ignited by summer lightning storms and largely burned in deeply wooded areas¹⁵. 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 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

Georgia EPD will hold a 30-day public comment period, to receive public input regarding the Exceptional Event Demonstrations. Notification of the public comment period will be posted on the Georgia EPD website and emailed to interested stakeholders. Public comments received will be included in Appendix G of this demonstration, along with the Georgia EPD's responses to these comments in Appendix.

¹⁵ https://earthobservatory.nasa.gov/images/151985/tracking-canadas-extreme-2023-fire-season

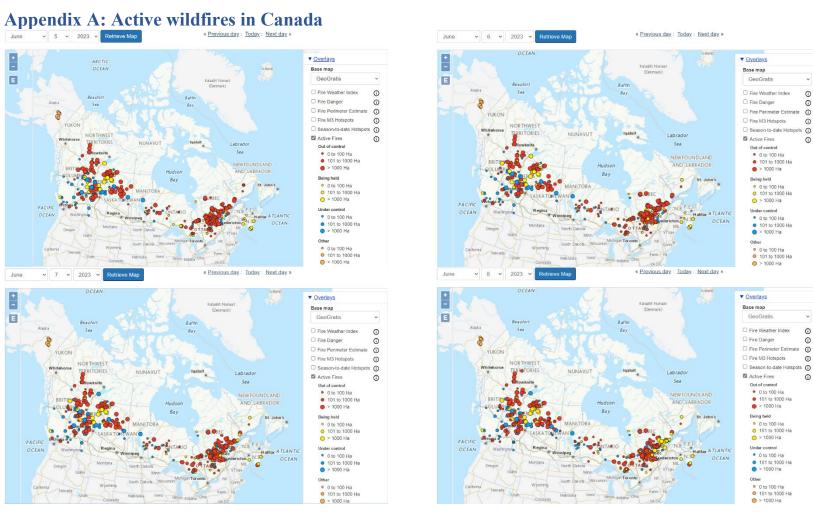


Figure A1. Active wildfires in Canada on June 5-8, 2023.

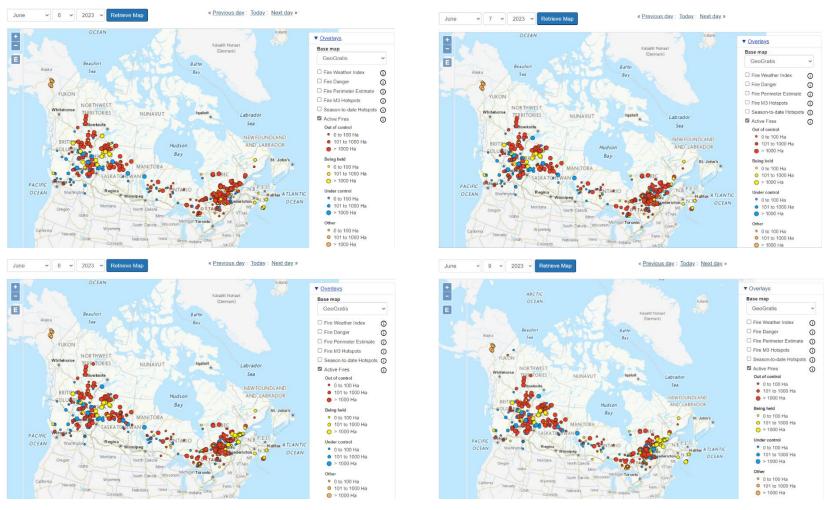


Figure A2. Active wildfires in Canada on June 6-9, 2023.

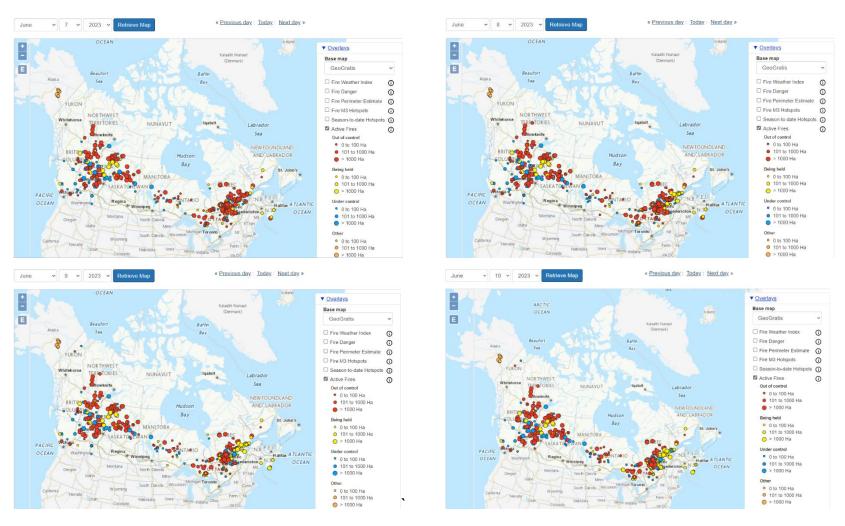


Figure A3. Active wildfires in Canada on June 7-10, 2023.

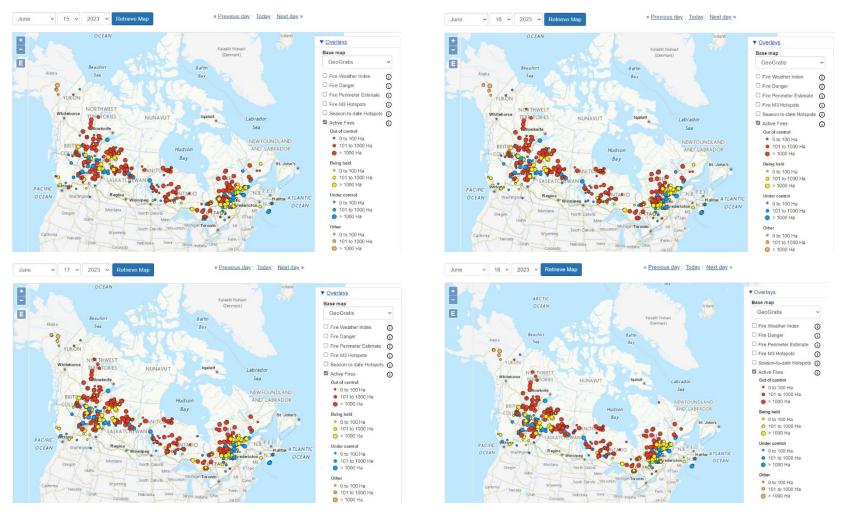


Figure A4. Active wildfires in Canada on June 15-18, 2023.

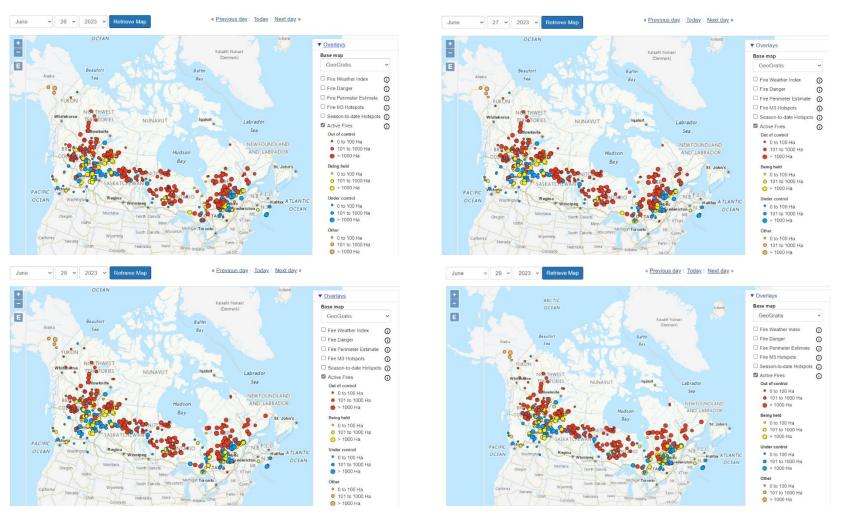


Figure A5. Active wildfires in Canada on June 26-29, 2023.

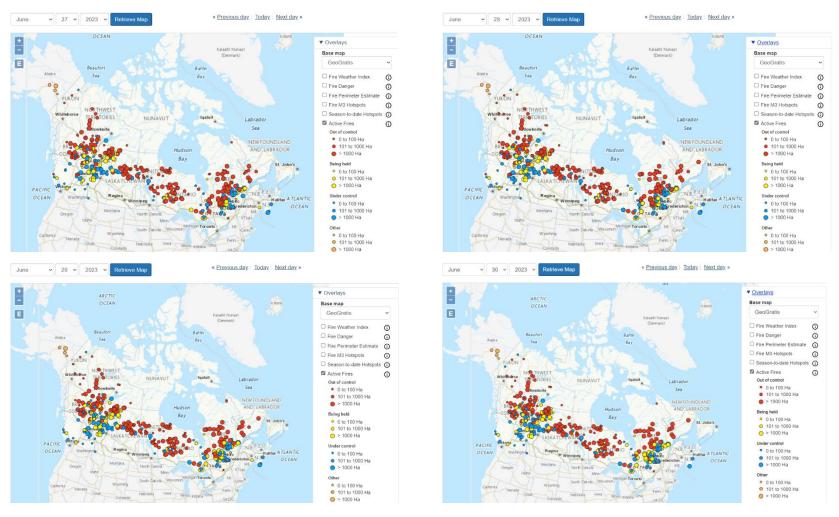


Figure A6. Active wildfires in Canada on June 27-30, 2023.

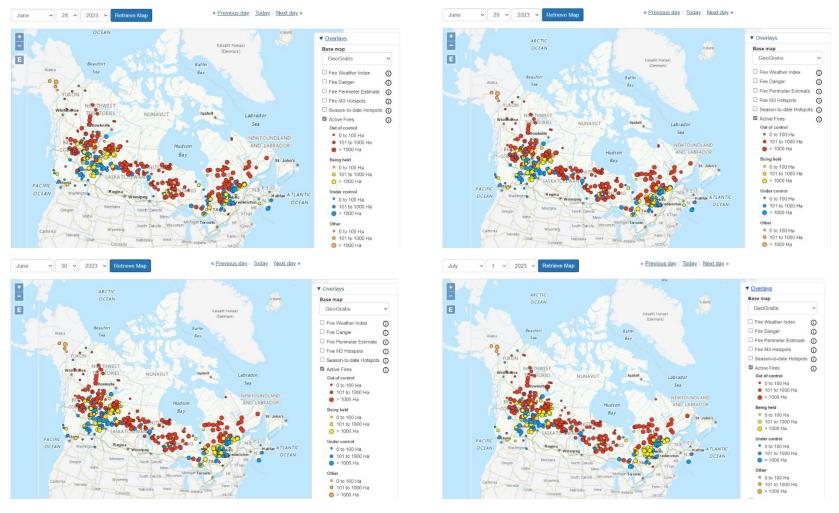


Figure A7. Active wildfires in Canada on June 28 - July 1, 2023.

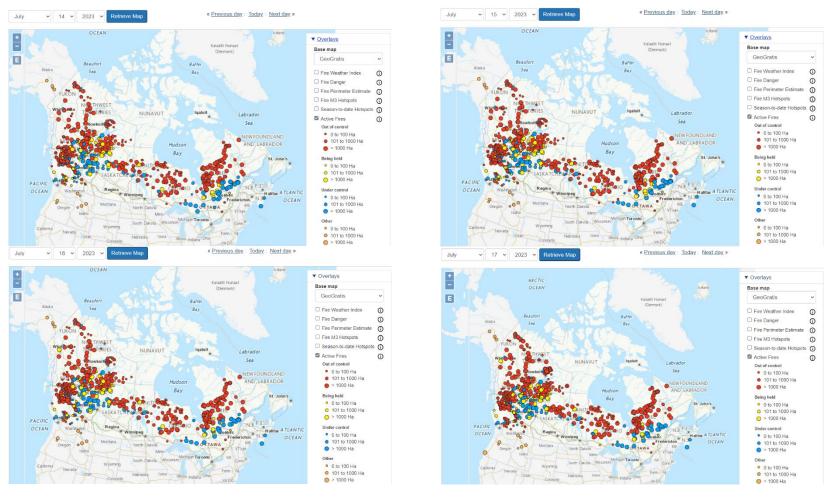


Figure A8. Active wildfires in Canada on July 14-17, 2023.

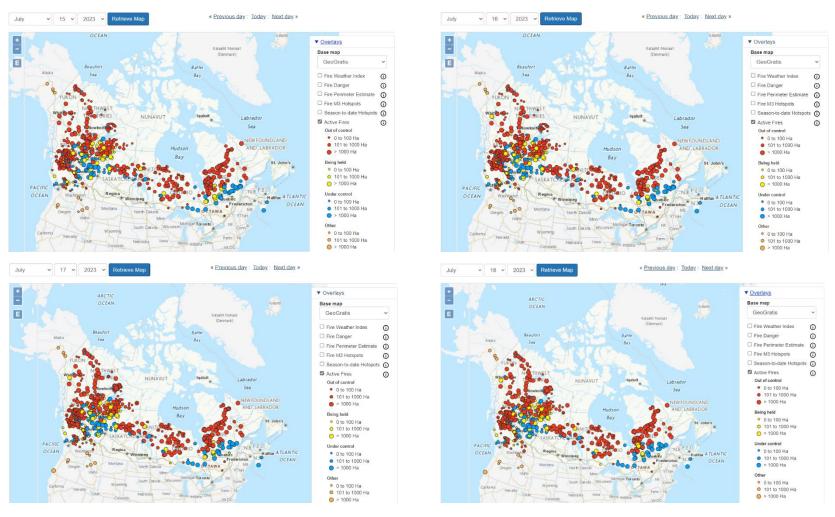


Figure A9. Active wildfires in Canada on July 15-18, 2023.

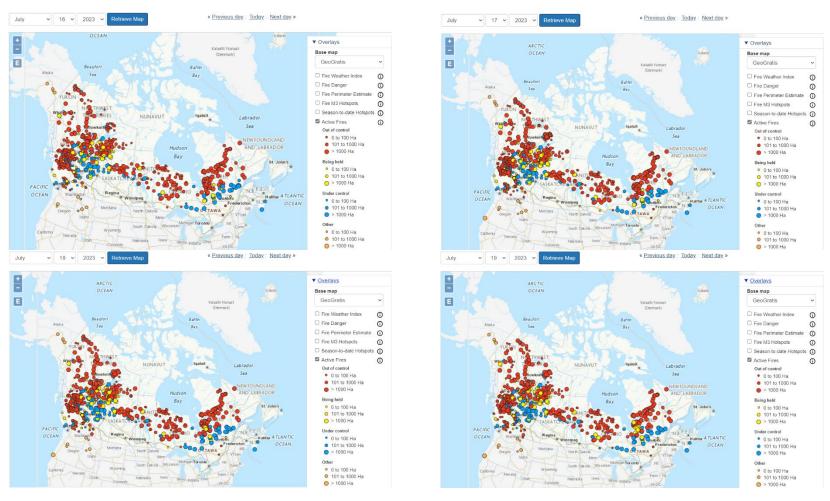


Figure A10. Active wildfires in Canada on July 16-19, 2023.

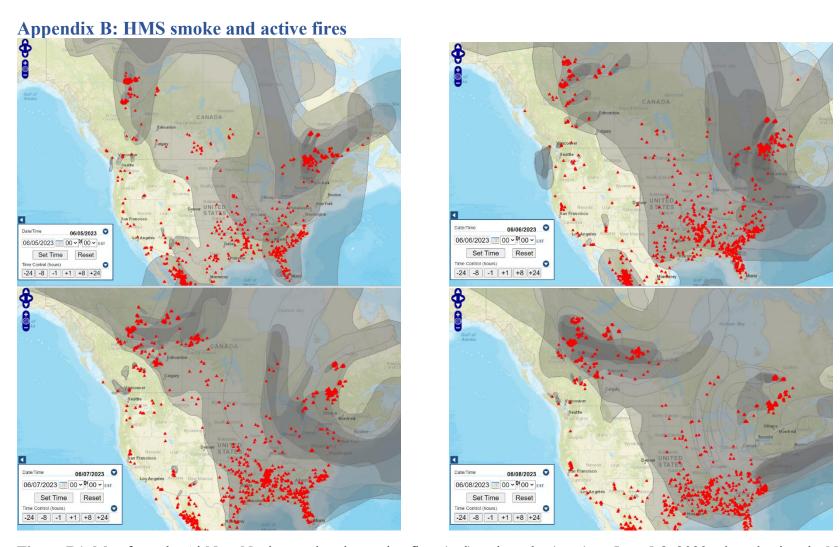


Figure B1. Map from the AirNow Navigator showing active fires (red) and smoke (grey) on June 5-8, 2023, plotted using the NOAA HMS over North America.

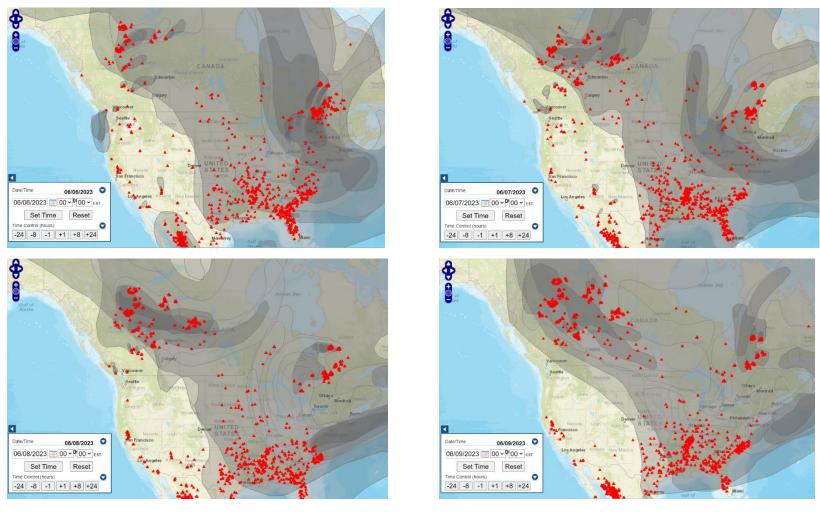


Figure B2. Map from the AirNow Navigator showing active fires (red) and smoke (grey) on June 6-9, 2023, plotted using the NOAA HMS over North America.

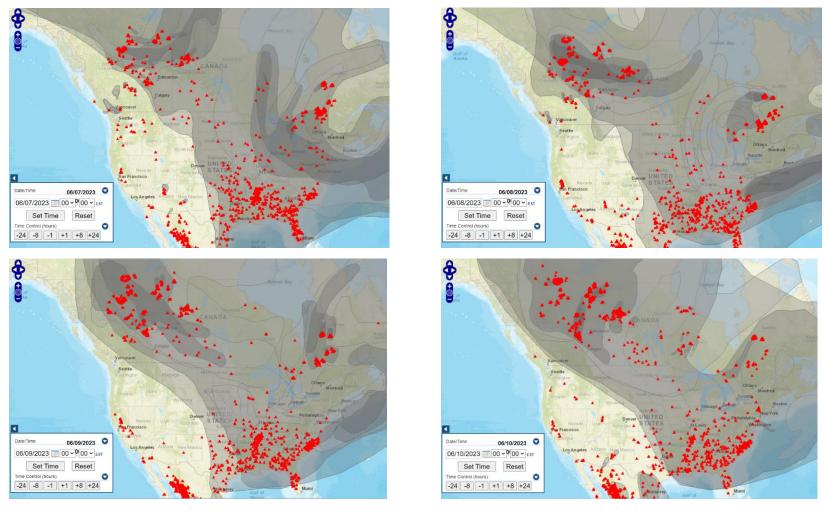


Figure B3. Map from the AirNow Navigator showing active fires (red) and smoke (grey) on June 7-10, 2023, plotted using the NOAA HMS over North America.

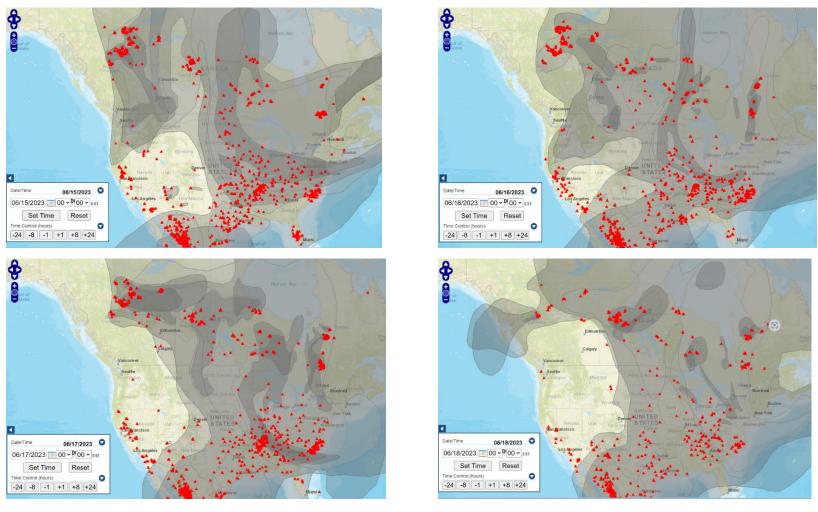


Figure B4. Map from the AirNow Navigator showing active fires (red) and smoke (grey) on June 15-18, 2023, plotted using the NOAA HMS over North America.

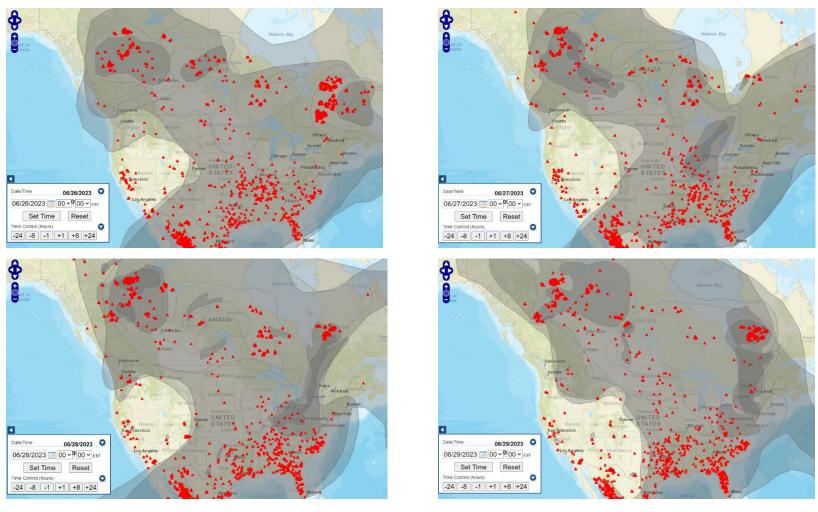


Figure B5. Map from the AirNow Navigator showing active fires (red) and smoke (grey) on June 26-29, 2023, plotted using the NOAA HMS over North America.

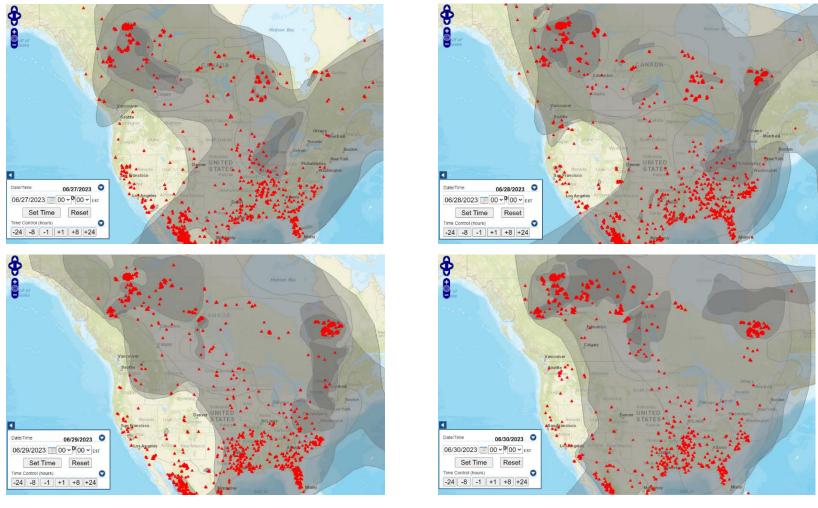


Figure B6. Map from the AirNow Navigator showing active fires (red) and smoke (grey) on June 27-30, 2023, plotted using the NOAA HMS over North America.

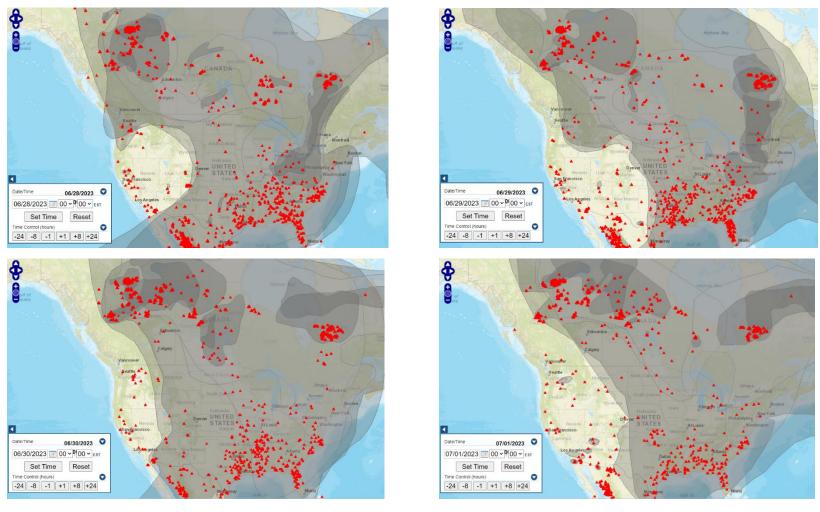


Figure B7. Map from the AirNow Navigator showing active fires (red) and smoke (grey) on June 28 - July 1, 2023, plotted using the NOAA HMS over North America.

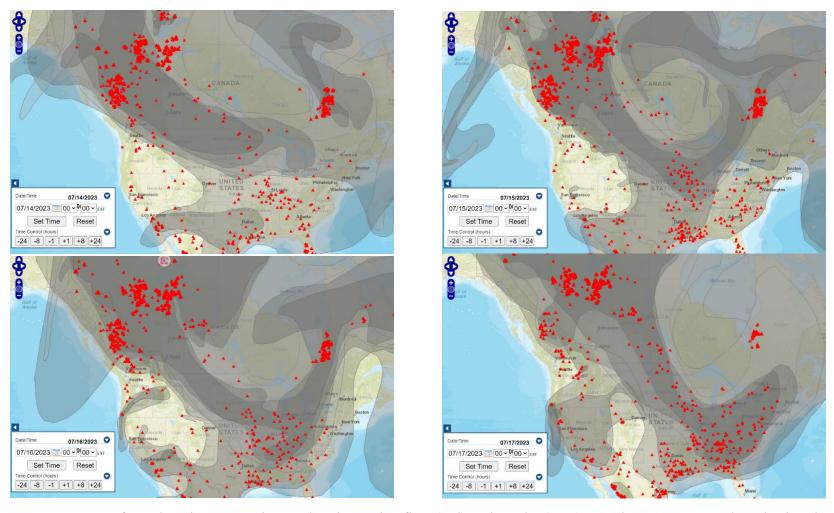


Figure B8. Map from the AirNow Navigator showing active fires (red) and smoke (grey) on July 14-17, 2023, plotted using the NOAA HMS over North America.

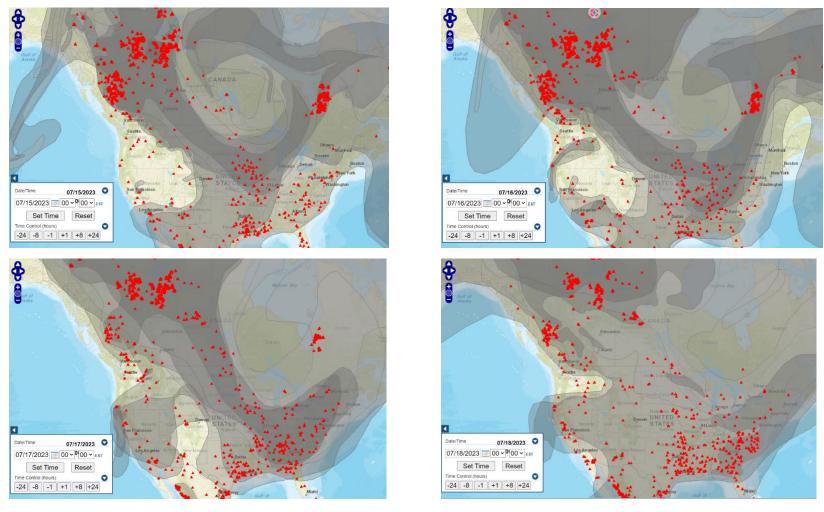


Figure B9. Map from the AirNow Navigator showing active fires (red) and smoke (grey) on July 15-18, 2023, plotted using the NOAA HMS over North America.

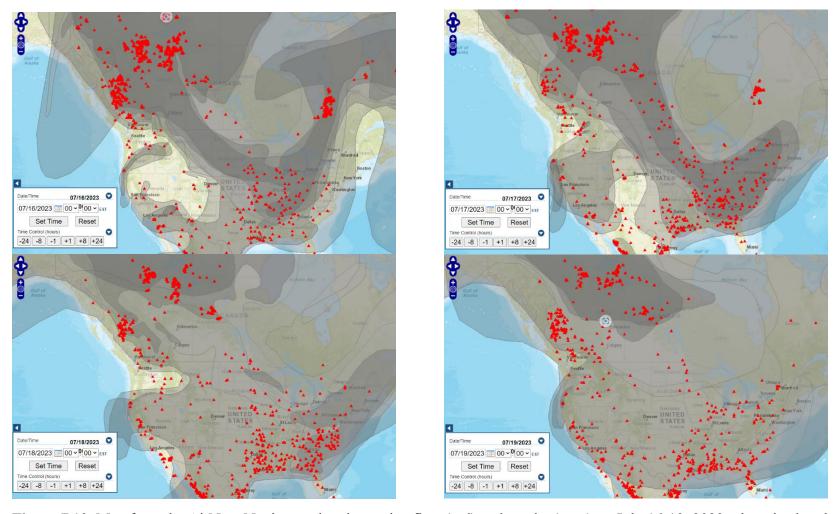


Figure B10. Map from the AirNow Navigator showing active fires (red) and smoke (grey) on July 16-19, 2023, plotted using the NOAA HMS over North America.

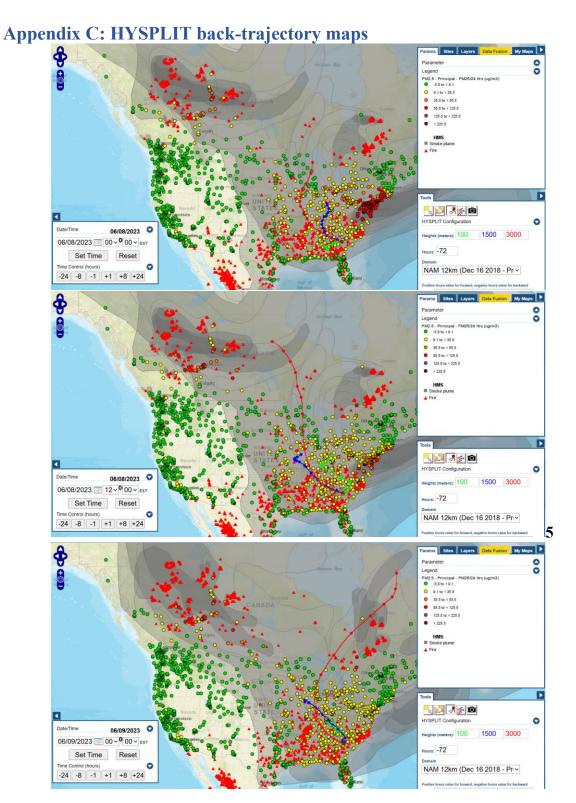


Figure C1. Map of HMS smoke plumes (grey polygons) and fires (red triangles), 24-hour rolling average PM_{2.5} concentrations (circles), and HYSPLIT back-trajectories of release heights at 100 m (green lines), 1500 m (blue lines), and 3000 m (red lines) for 0 AM EST on June 8, 2023 (top), 12 PM EST on June 8, 2023 (middle), and 0 AM EST on June 9, 2023 (bottom).

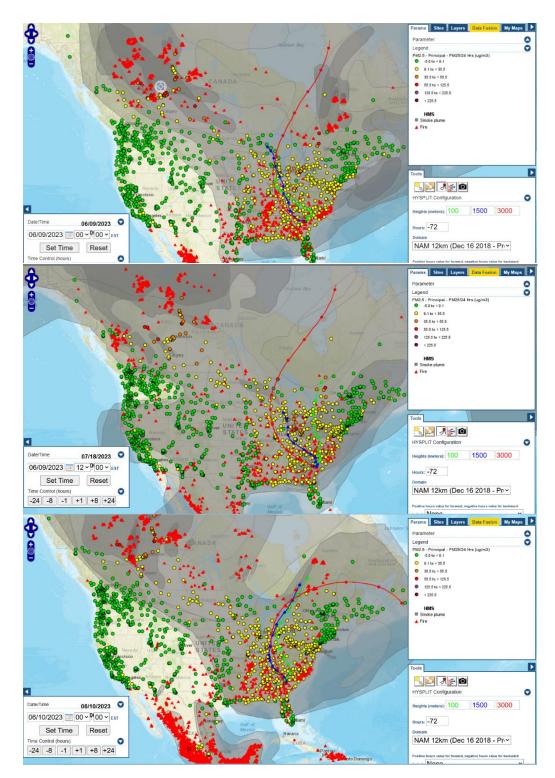


Figure C2. Map of HMS smoke plumes (grey polygons) and fires (red triangles), 24-hour rolling average PM_{2.5} concentrations (circles), and HYSPLIT back-trajectories of release heights at 100 m (green lines), 1500 m (blue lines), and 3000 m (red lines) for 0 AM EST on June 9, 2023 (top), 12 PM EST on June 9, 2023 (middle), and 0 AM EST on June 10, 2023 (bottom).

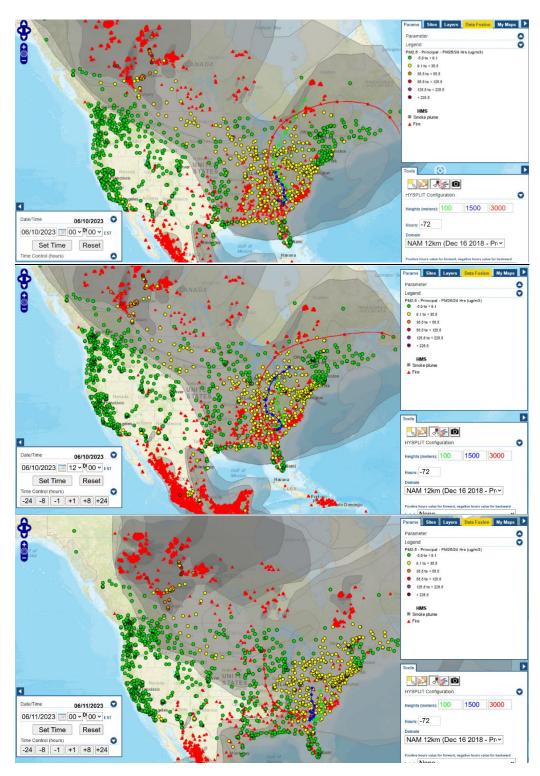


Figure C3. Map of HMS smoke plumes (grey polygons) and fires (red triangles), 24-hour rolling average PM_{2.5} concentrations (circles), and HYSPLIT back-trajectories of release heights at 100 m (green lines), 1500 m (blue lines), and 3000 m (red lines) for 0 AM EST on June 10, 2023 (top), 12 PM EST on June 10, 2023 (middle), and 0 AM EST on June 11, 2023 (bottom).

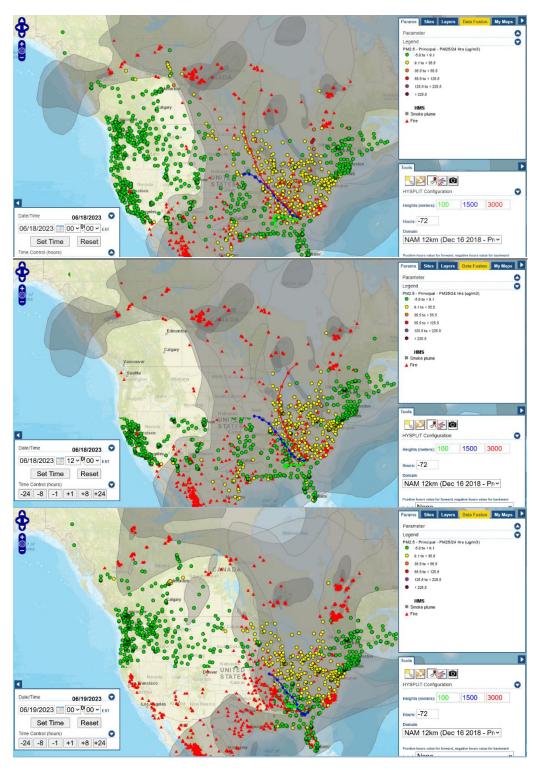


Figure C4. Map of HMS smoke plumes (grey polygons) and fires (red triangles), 24-hour rolling average $PM_{2.5}$ concentrations (circles), and HYSPLIT back-trajectories of release heights at 100 m (green lines), 1500 m (blue lines), and 3000 m (red lines) for 0 AM EST on June 18, 2023 (top), 12 PM EST on June 18, 2023 (middle), and 0 AM EST on June 19, 2023 (bottom).

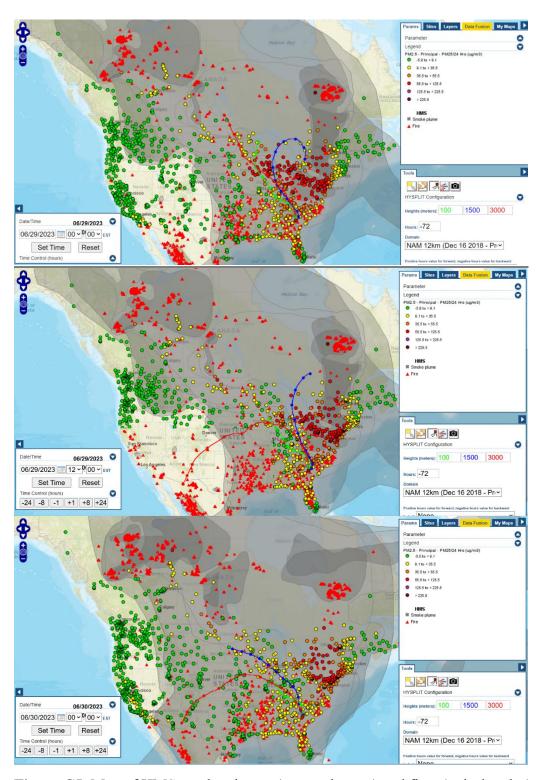


Figure C5. Map of HMS smoke plumes (grey polygons) and fires (red triangles), 24-hour rolling average $PM_{2.5}$ concentrations (circles), and HYSPLIT back-trajectories of release heights at 100 m (green lines), 1500 m (blue lines), and 3000 m (red lines) for 0 AM EST on June 29, 2023 (top), 12 PM EST on June 29, 2023 (middle), and 0 AM EST on June 30, 2023 (bottom).

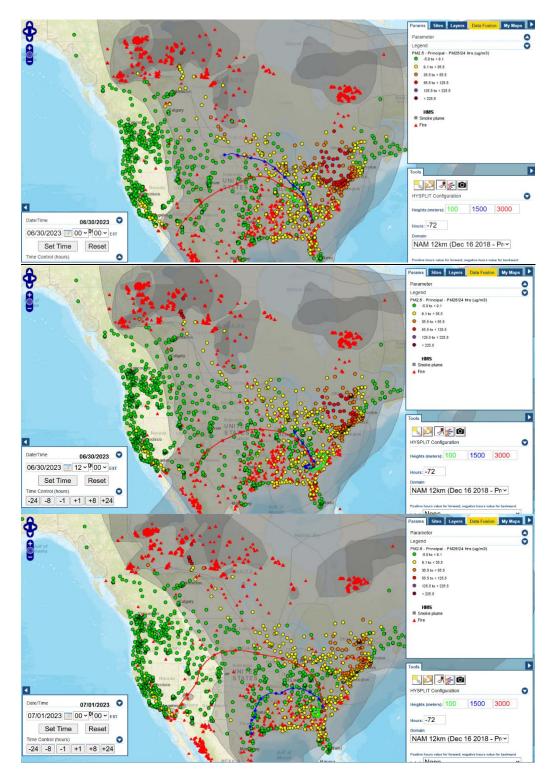


Figure C6. Map of HMS smoke plumes (grey polygons) and fires (red triangles), 24-hour rolling average PM_{2.5} concentrations (circles), and HYSPLIT back-trajectories of release heights at 100 m (green lines), 1500 m (blue lines), and 3000 m (red lines) for 0 AM EST on June 30, 2023 (top), 12 PM EST on June 30, 2023 (middle), and 0 AM EST on July 1, 2023 (bottom).

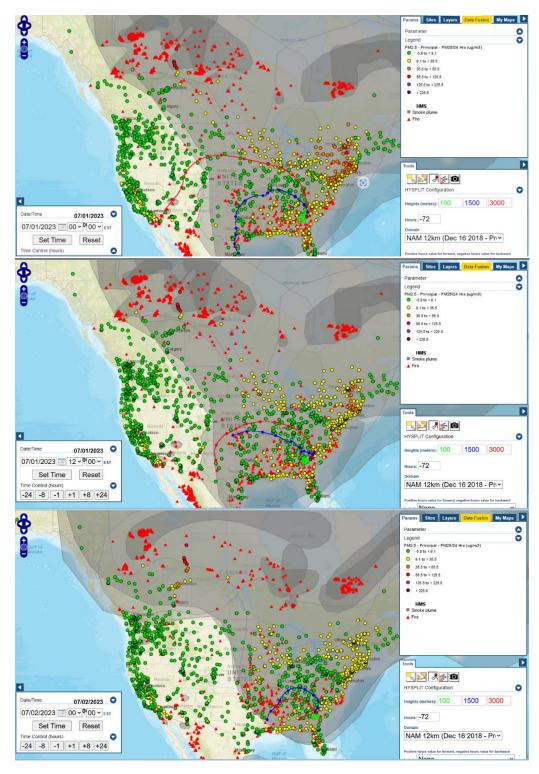


Figure C7. Map of HMS smoke plumes (grey polygons) and fires (red triangles), 24-hour rolling average PM_{2.5} concentrations (circles), and HYSPLIT back-trajectories of release heights at 100 m (green lines), 1500 m (blue lines), and 3000 m (red lines) for 0 AM EST on July 1, 2023 (top), 12 PM EST on July 1, 2023 (middle), and 0 AM EST on July 2, 2023 (bottom).

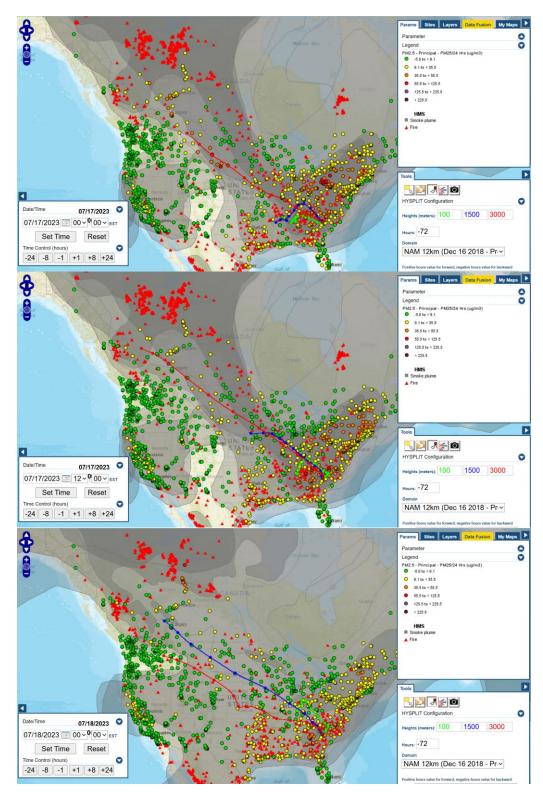


Figure C8. Map of HMS smoke plumes (grey polygons) and fires (red triangles), 24-hour rolling average PM_{2.5} concentrations (circles), and HYSPLIT back-trajectories of release heights at 100 m (green lines), 1500 m (blue lines), and 3000 m (red lines) for 0 AM EST on July 17, 2023 (top), 12 PM EST on July 17, 2023 (middle), and 0 AM EST on July 18, 2023 (bottom).

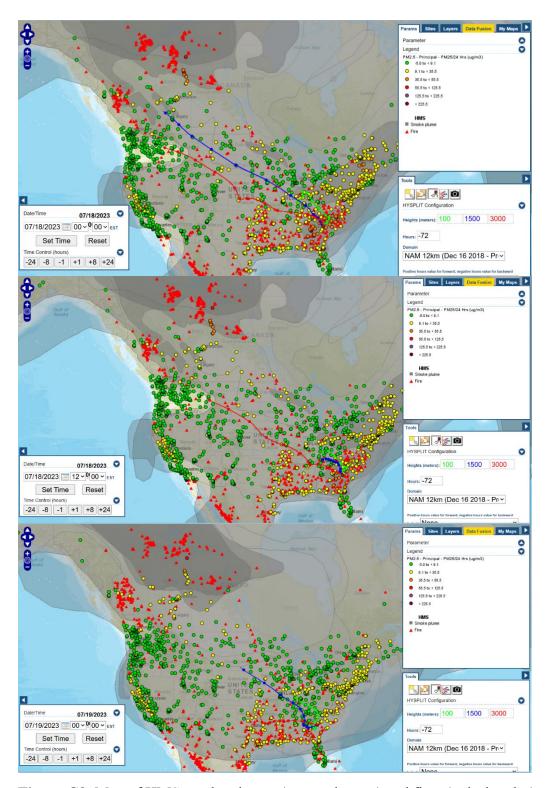


Figure C9. Map of HMS smoke plumes (grey polygons) and fires (red triangles), 24-hour rolling average $PM_{2.5}$ concentrations (circles), and HYSPLIT back-trajectories of release heights at 100 m (green lines), 1500 m (blue lines), and 3000 m (red lines) for 0 AM EST on July 18, 2023 (top), 12 PM EST on July 18, 2023 (middle), and 0 AM EST on July 19, 2023 (bottom).

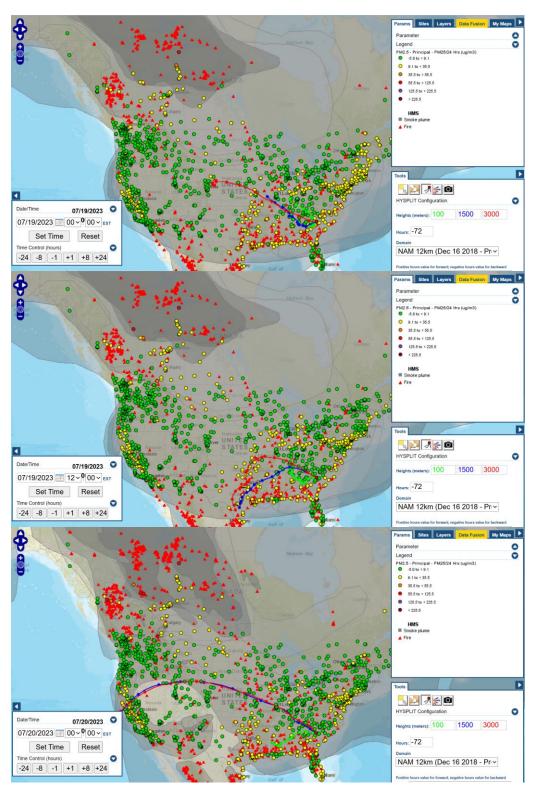
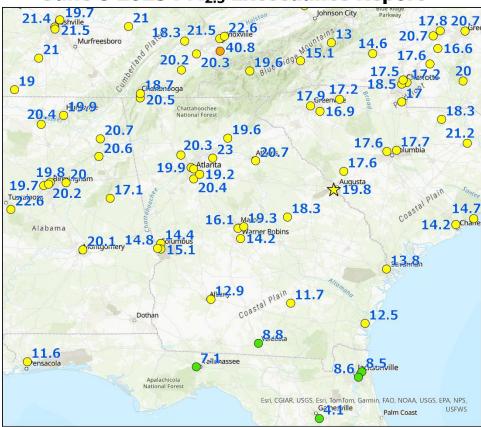


Figure C10. Map of HMS smoke plumes (grey polygons) and fires (red triangles), 24-hour rolling average PM_{2.5} concentrations (circles), and HYSPLIT back-trajectories of release heights at 100 m (green lines), 1500 m (blue lines), and 3000 m (red lines) for 0 AM EST on July 19, 2023 (top), 12 PM EST on July 19, 2023 (middle), and 0 AM EST on July 20, 2023 (bottom).

Appendix D: Surface concentrations in the southeast June 8 2023 PM_{2.5} Exceedance Report

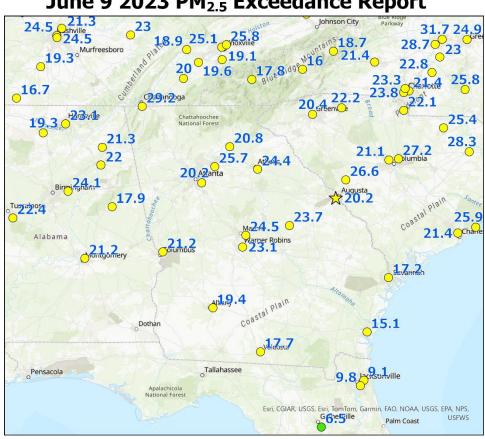


AQI category - 24-hr average PM_{2.5}

- 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 8, 2023, across the southeast. The Augusta site is represented with a star. Numerous sites observed concentrations exceeding the $PM_{2.5}$ NAAQS.

June 9 2023 PM_{2.5} Exceedance Report

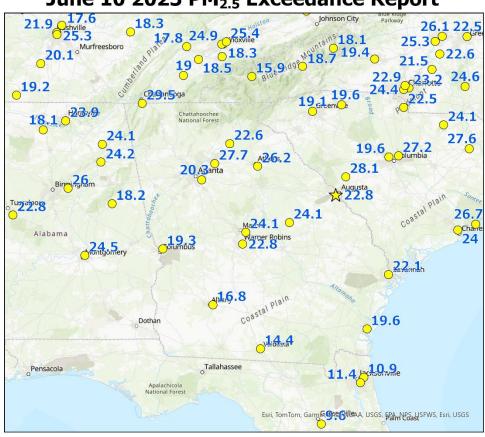


AQI category - 24-hr average PM_{2.5}

- 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 June 9, 2023, across the southeast. The Augusta site is represented with a star. Numerous sites observed concentrations exceeding the PM_{2.5} NAAQS.

June 10 2023 PM_{2.5} Exceedance Report

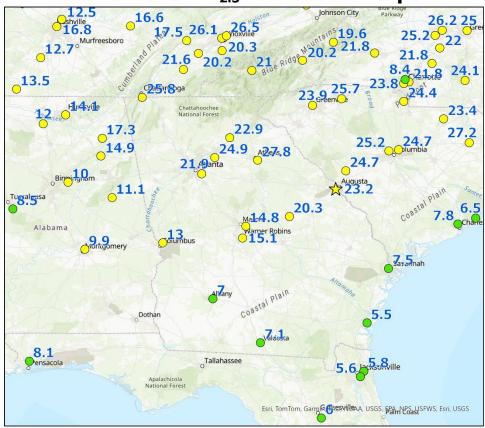


AQI category - 24-hr average PM_{2.5}

- 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 D3. Surface level, daily $PM_{2.5}$ concentrations on June 10, 2023, across the southeast. The Augusta site is represented with a star. Numerous sites observed concentrations exceeding the $PM_{2.5}$ NAAQS.

June 18 2023 PM_{2.5} Exceedance Report

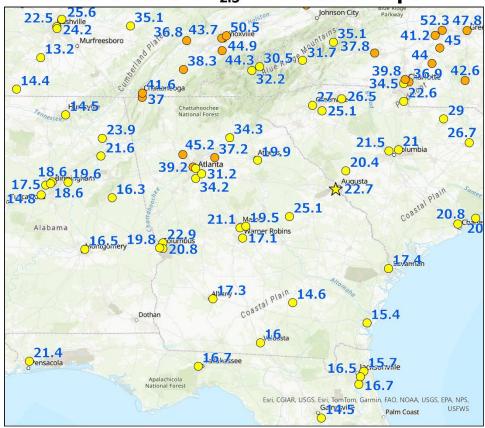


AQIcategory24hraveragePMSUB2_ExportFeatures268

- Ocod (0-9 ug/m³)
- O 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 D4. Surface level, daily PM_{2.5} concentrations on June 18, 2023, across the southeast. The Augusta site is represented with a star. Numerous sites observed concentrations exceeding the PM_{2.5} NAAQS.

June 29 2023 PM_{2.5} Exceedance Report



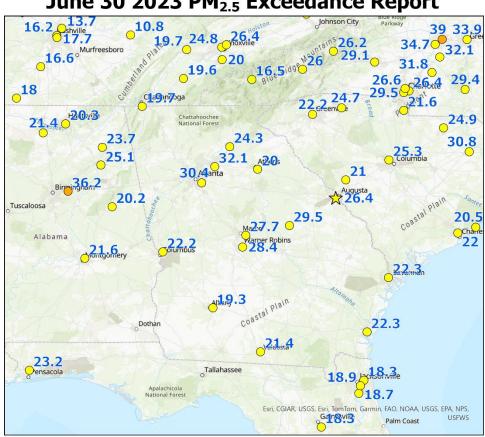
AQI category - 24-hr average PM_{2.5}

FINAL

- 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 D5. Surface level, daily PM_{2.5} concentrations on June 29, 2023, across the southeast. The Augusta site is represented with a star. Numerous sites observed concentrations exceeding the PM_{2.5} NAAQS.

June 30 2023 PM_{2.5} Exceedance Report



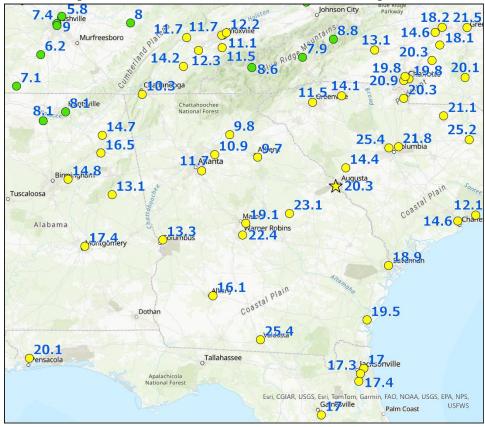
AQI category - 24-hr average PM_{2.5}

FINAL

- 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 D6. Surface level, daily PM_{2.5} concentrations on June 30, 2023, across the southeast. The Augusta site is represented with a star. Numerous sites observed concentrations exceeding the PM_{2.5} NAAQS.





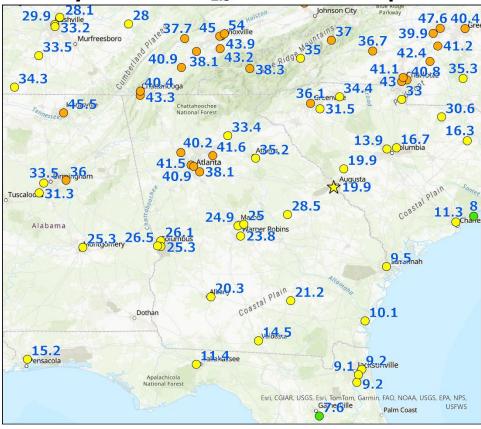
AQIcategory24hraveragePMSUB2_ExportFeatures274

FINAL

- Ocod (0-9 ug/m³)
- O 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 D7. Surface level, daily PM_{2.5} concentrations on July 1, 2023, across the southeast. The Augusta site is represented with a star. Numerous sites observed concentrations exceeding the PM_{2.5} NAAQS.



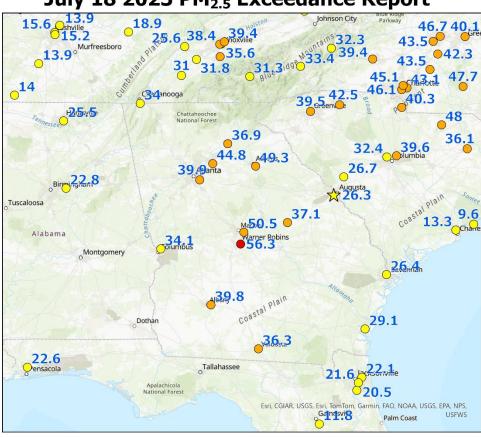


AQI category - 24-hr average PM_{2.5}

- 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 D8. Surface level, daily $PM_{2.5}$ concentrations on July 17, 2023, across the southeast. The Augusta site is represented with a star. Numerous sites observed concentrations exceeding the $PM_{2.5}$ NAAQS.



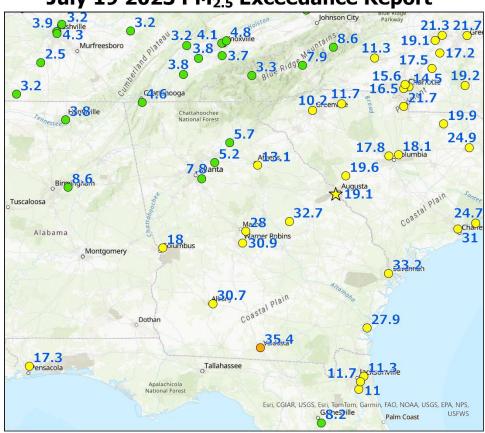


AQI category - 24-hr average PM_{2.5}

- 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 D9. Surface level, daily PM_{2.5} concentrations on July 18, 2023, across the southeast. The Augusta site is represented with a star. Numerous sites observed concentrations exceeding the PM_{2.5} NAAQS.

July 19 2023 PM_{2.5} Exceedance Report



AQI category - 24-hr average PM_{2.5}

- Good (0-9 ug/m³)
- O 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 D10. Surface level, daily PM_{2.5} concentrations on July 19, 2023, across the southeast.

The Augusta site is represented with a star. Numerous sites observed concentrations exceeding the PM_{2.5} NAAQS.

Appendix E: Hourly PM_{2.5} Time Series

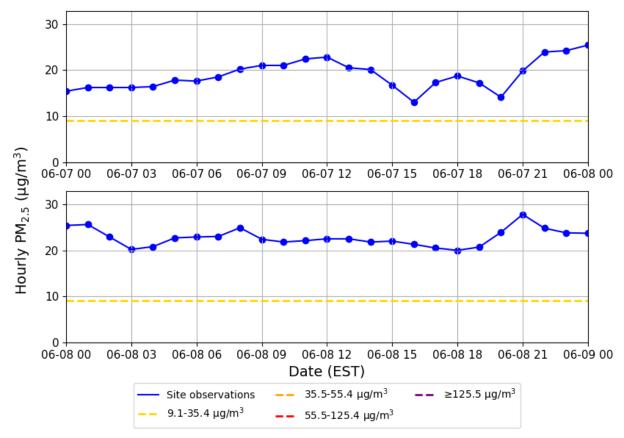


Figure E1. Hourly PM_{2.5} concentrations at the Augusta site on June 7 and 8, 2023. The solid lines with dots show observations, and the dashed lines show AQI tiers adjusted for the 2024 PM_{2.5} NAAQS.

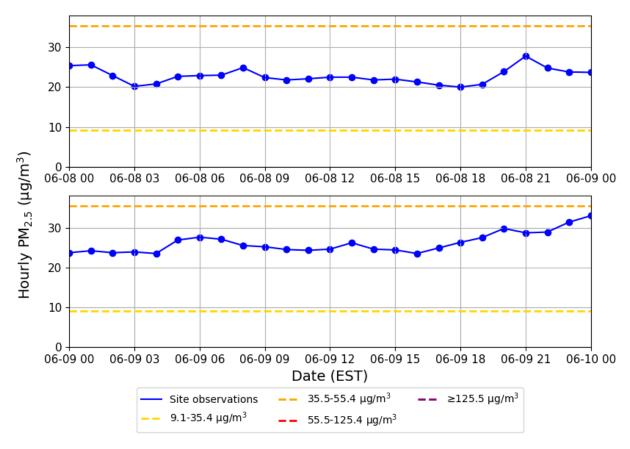


Figure E2. Hourly PM_{2.5} concentrations at the Augusta site on June 8 and 9, 2023. The solid lines with dots show observations, and the dashed lines show AQI tiers adjusted for the 2024 PM_{2.5} NAAQS.

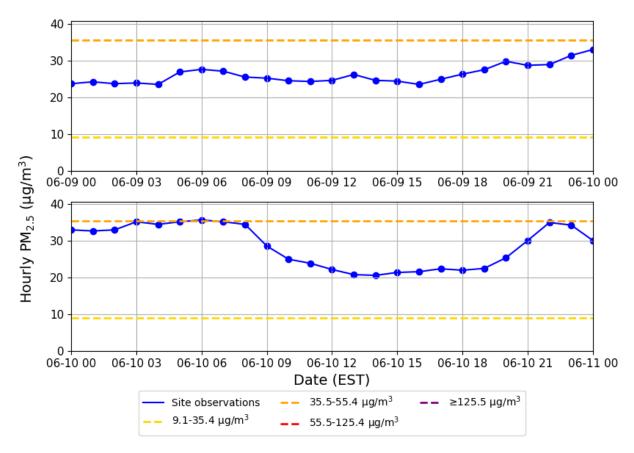


Figure E3. Hourly PM_{2.5} concentrations at the Augusta site on June 9 and 10, 2023. The solid lines with dots show observations, and the dashed lines show AQI tiers adjusted for the 2024 PM_{2.5} NAAQS.

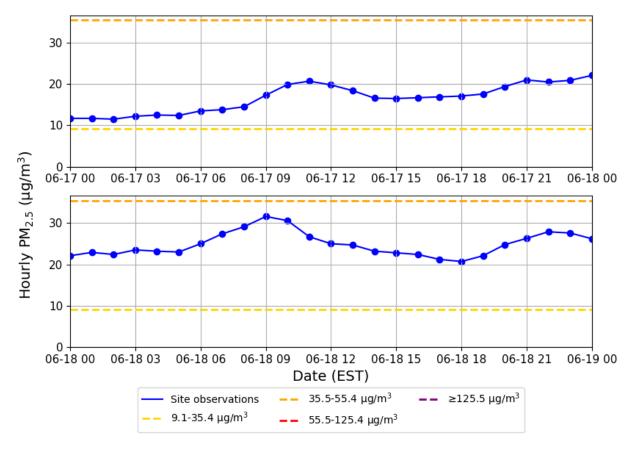


Figure E4. Hourly PM_{2.5} concentrations at the Augusta site on June 17 and 18, 2023. The solid lines with dots show observations, and the dashed lines show AQI tiers adjusted for the 2024 PM_{2.5} NAAQS.

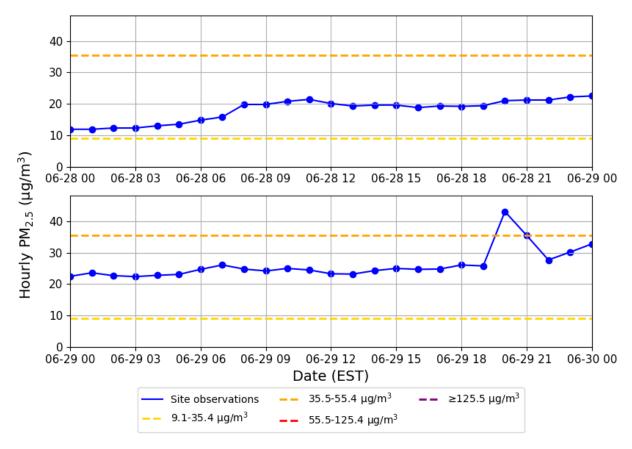


Figure E5. Hourly PM_{2.5} concentrations at the Augusta site on June 28 and 29, 2023. The solid lines with dots show observations, and the dashed lines show AQI tiers adjusted for the 2024 PM_{2.5} NAAQS.

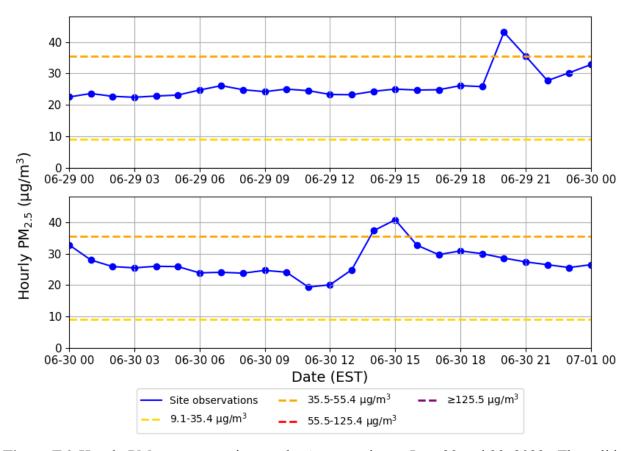


Figure E6. Hourly PM_{2.5} concentrations at the Augusta site on June 29 and 39, 2023. The solid lines with dots show observations, and the dashed lines show AQI tiers adjusted for the 2024 PM_{2.5} NAAQS.

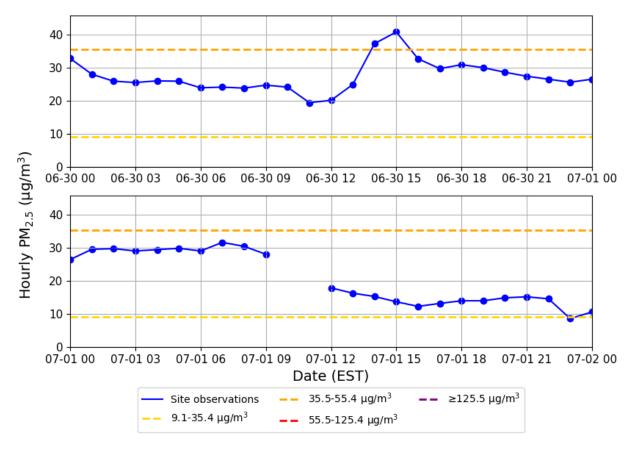


Figure E7. Hourly PM_{2.5} concentrations at the Augusta site on June 30 and July 1, 2023. The solid lines with dots show observations, and the dashed lines show AQI tiers adjusted for the 2024 PM_{2.5} NAAQS.

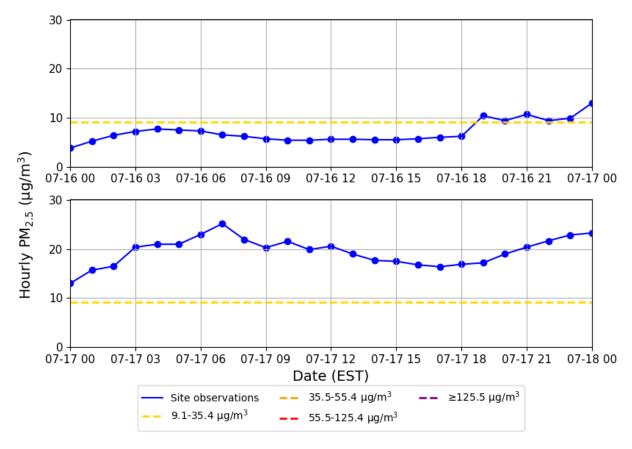


Figure E8. Hourly PM_{2.5} concentrations at the Augusta site on July 16 and 17, 2023. The solid lines with dots show observations, and the dashed lines show AQI tiers adjusted for the 2024 PM_{2.5} NAAQS.

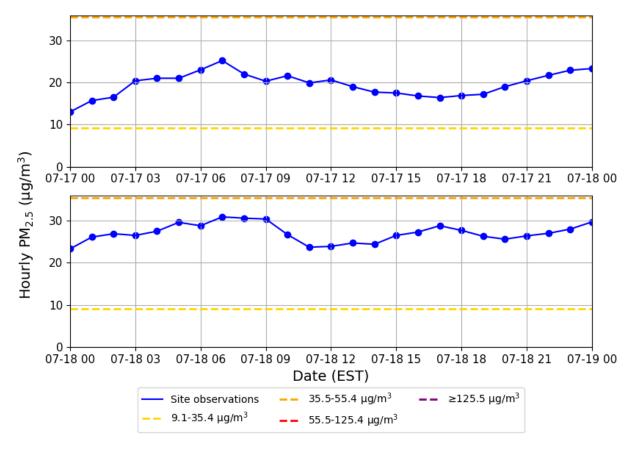


Figure E9. Hourly PM_{2.5} concentrations at the Augusta site on July 17 and 18, 2023. The solid lines with dots show observations, and the dashed lines show AQI tiers adjusted for the 2024 PM_{2.5} NAAQS.

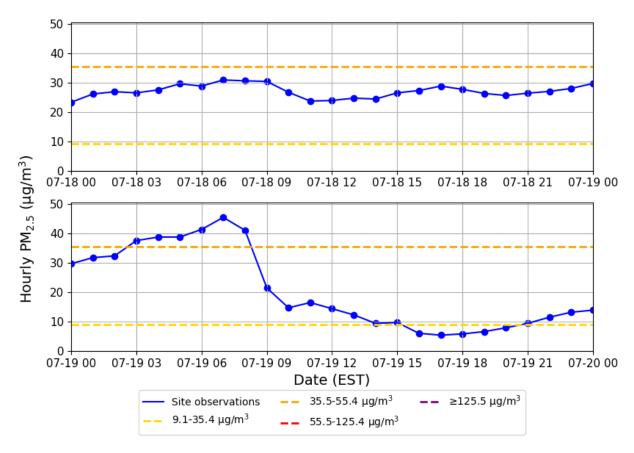


Figure E10. Hourly PM_{2.5} concentrations at the Augusta site on July 18 and 19, 2023. The solid lines with dots show observations, and the dashed lines show AQI tiers adjusted for the 2024 PM_{2.5} NAAQS.

Appendix F: Upper Air Maps

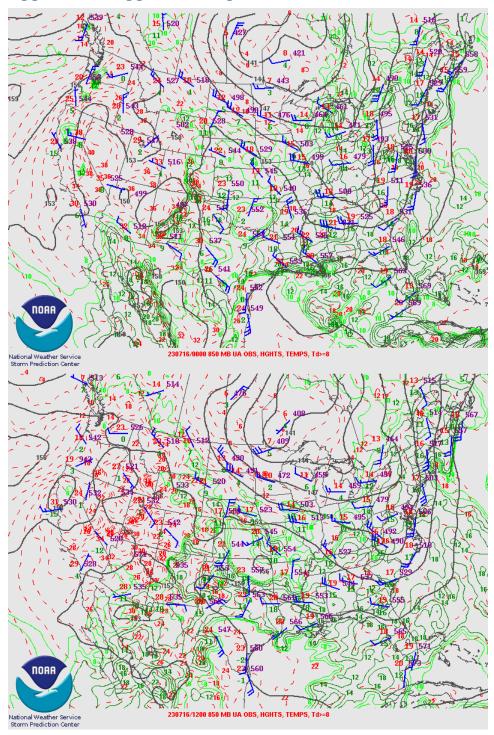


Figure F1. Storm Prediction Center upper air maps for July 16, 2023, at 00 UTC (top) and at 12 UTC (bottom). Maps are generated at a pressure of 850 mb (altitude of 1170-1590 m MSL). Wind barbs (degrees from north, knots) are plotted in blue, isotherms (degrees Celsius (°C)) in red, isodrosotherms (°C) in green contours, and isoheights (m MSL) in dark grey.

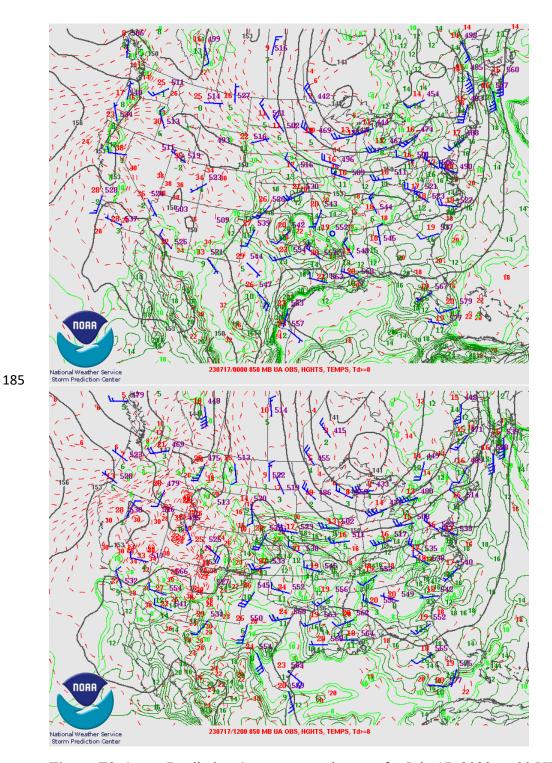


Figure F2. Storm Prediction Center upper air maps for July 17, 2023, at 00 UTC (top) and at 12 UTC (bottom). Maps are generated at a pressure of 850 mb (altitude of 1170-1590 m MSL). Wind barbs (degrees from north, knots) are plotted in blue, isotherms (°C) in red, isodrosotherms (°C) in green contours, and isoheights (m MSL) in dark grey.

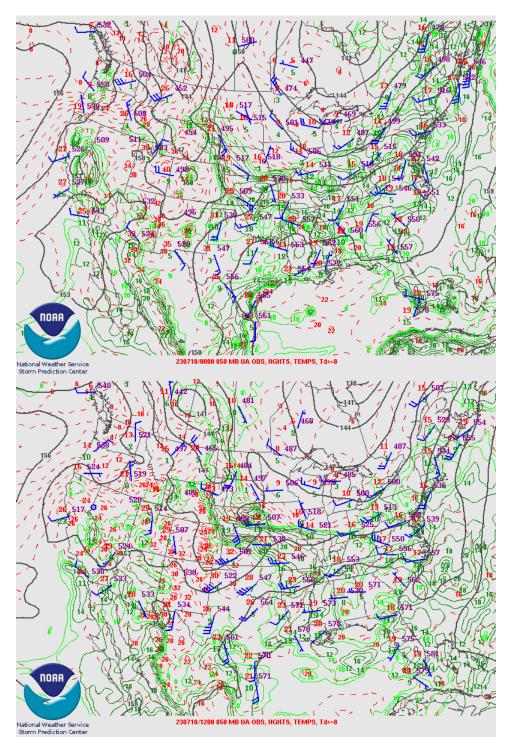


Figure F3. Storm Prediction Center upper air maps for July 18, 2023, at 00 UTC (top) and at 12 UTC (bottom). Maps are generated at a pressure of 850 mb (altitude of 1170-1590 m MSL). Wind barbs (degrees from north, knots) are plotted in blue, isotherms (°C) in red, isodrosotherms (°C) in green contours, and isoheights (m MSL) in dark grey.

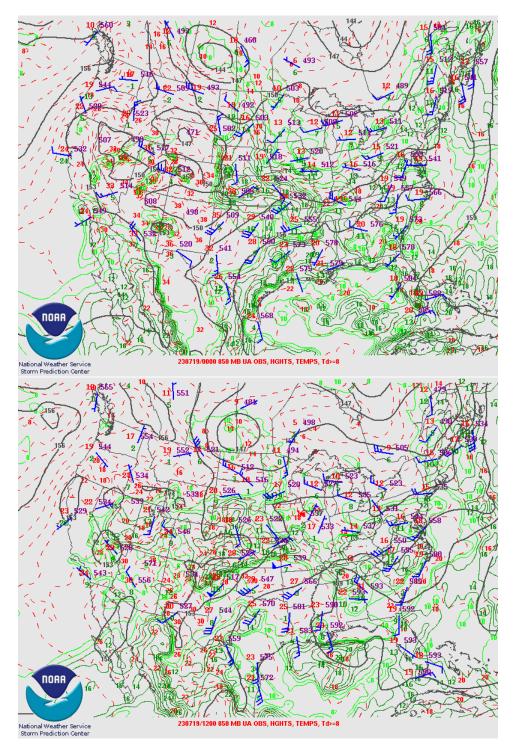


Figure F4. Storm Prediction Center upper air maps for July 19, 2023, at 00 UTC (top) and at 12 UTC (bottom). Maps are generated at a pressure of 850 mb (altitude of 1170-1590 m MSL). Wind barbs (° from north, knots) are plotted in blue, isotherms (°C) in red, isodrosotherms (°C) in green contours, and isoheights (m MSL) in dark grey.

Appendix G: Public comments

Appendix H: Responses to public comments