



# GEORGIA

DEPARTMENT OF NATURAL RESOURCES

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ENVIRONMENTAL PROTECTION DIVISION

## **Canadian Wildfire Exceptional Event Demonstration for Exceedances of the 2024 Annual PM<sub>2.5</sub> NAAQS at Macon, GA in 2023**

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## 1. Introduction

The current annual and 24-hour PM<sub>2.5</sub> National Ambient Air Quality Standards (NAAQS) are 9.0 µg/m<sup>3</sup> and 35 µg/m<sup>3</sup>, respectively. Federal Reference Method (FRM) monitors collect PM<sub>2.5</sub> samples for 24 hours on filters while Federal Equivalent Method (FEM) monitors measure hourly PM<sub>2.5</sub> concentrations continuously. An exceedance of the 2024 annual PM<sub>2.5</sub> NAAQS occurs when the measured 24-hour PM<sub>2.5</sub> concentration is greater than 9.0 µg/m<sup>3</sup>.

From 2019 through 2023, two collocated FRM monitors operated at the Macon-Allied site. The primary monitor collected data on a one in three-day schedule, and the collocated monitor collected data on a one in twelve-day schedule. In addition, an FEM monitor started collecting data in June 2023, with a NAAQS exclusion on the data. The Macon-Bibb County MSA is in attainment of the 2012 PM<sub>2.5</sub> NAAQS.

This exceptional event demonstration shows that the Macon-Allied air monitoring site located in Macon (Macon-Bibb County) in the state of Georgia (AQS ID: 13-021-0007) reported exceedances of the 2024 annual PM<sub>2.5</sub> NAAQS on 11 different days from 2021-2023 that that qualify for exceptional event demonstrations (Table 1), five of which were due to Canadian wildfires. These exceedances resulted from the transport of wildfire smoke that originated in Canada; therefore, qualify for removal under the Exceptional Events Rule (EER). Design values (DVs) of the Macon-Allied monitor with and without U.S. Environmental Protection Agency (EPA) concurrence are shown in Table 2. DVs are calculated using 24-hour PM<sub>2.5</sub> 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 9.4 µg/m<sup>3</sup>, which is above the new 2024 PM<sub>2.5</sub> annual NAAQS; however, exclusion reduces the DV at 9.0 µg/m<sup>3</sup>.

On December 20, 2024, the Georgia Environmental Protection Division (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 (5 events) and requested review of the events under the case-by-case provision at 40 CFR 50.14(a)(1)(i)(F). This demonstration will focus on the five Canadian wildfire events, while a separate demonstration will focus on the six prescribed fire events. Georgia EPD formally requests that the EPA concur with the exclusion of these events.

**Table 1.** Exceedances of the 2024 annual PM<sub>2.5</sub> NAAQS observed by monitors stationed in Macon, GA at the Macon-Allied site in 2021-2023 that qualify for removal under the Exceptional Events Rule.

#	Date	24-hour PM <sub>2.5</sub> (µg/m <sup>3</sup> )	Tier	Cause of Exceedance
1	04/07/21	28.3	1	Prescribed fires
2	12/03/21	24.6	1	Prescribed fires
3	03/03/22	24.2	1	Prescribed fires
4	03/07/23	24.4	1	Prescribed fires
5	06/29/23	21.1	2	Canadian Wildfires
6	07/17/23	24.9	1	Canadian Wildfires
7	07/20/23	17.7	2	Canadian Wildfires
8	07/26/23	16.5	2	Canadian Wildfires
9	08/25/23	18.9	2	Canadian Wildfires
10	10/03/23	22.2	2	Prescribed fires
11	11/08/23	22.3	2	Prescribed fires

**Table 2.** Design values for monitors at the Macon-Allied site for the 2024 annual PM<sub>2.5</sub> NAAQS.

Monitor Site (AQS ID)	2021-2023 DV without EPA Concurrence (µg/m <sup>3</sup> )	2021-2023 DV with EPA Concurrence (µg/m <sup>3</sup> )
Macon-Allied (13-021-0007)	9.4	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<sub>2.5</sub> 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 Canadian wildfires that affected public health and impacted air quality monitors in Macon, 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<sub>2.5</sub> 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)<sup>1</sup>. Temperatures and land aridity across Canada were unusually high and resulted in the burning of a record-breaking amount of land area (≥156,000 km<sup>2</sup>)<sup>2</sup>. The land area burned during this season

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

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

far exceeded the average<sup>3</sup> of 21,000 km<sup>2</sup>, 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 Map<sup>4</sup>. On the dates listed in Table 1 (Figures A1-A5), when the exceedance was recorded by the relevant monitor, Canadian wildfires were on-going across the country, the majority of which had each consumed >1000 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<sub>2.5</sub> 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 either from fires in Quebec or from the western provinces (British Columbia, Alberta, and Saskatchewan), and transported across the Midwest of the United States. One event on July 20, 2023, circulated Canadian wildfire smoke from the west (potentially originating in Texas) into Georgia.

This conceptual model describes how emissions from wildfires in Canada and environmental conditions contributed to the events dated in Table 1. Smoke emissions enhanced PM<sub>2.5</sub> concentrations observed by the monitor as they were transported to the Macon-Allied site and caused an exceedance of the annual PM<sub>2.5</sub> NAAQS. Georgia EPD requests EPA's concurrence on these dates 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 website<sup>5</sup> 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<sub>2.5</sub>, (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 website<sup>6</sup> has a link to the GFC interactive

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

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

<sup>5</sup> <https://georgiafc.firesponse.com/public/>

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

burn permit map. Also, the Georgia EPD website has a link to EPA's AirNow Fire and Smoke Map<sup>7</sup>, EPA's AirNow When Smoke is in the Air<sup>8</sup>, EPA's AirNow Prepare for Fire Season<sup>9</sup>, and the EPA's Smoke-Ready Toolbox for Wildfires<sup>10</sup>. 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 website<sup>11</sup> provides near real-time ambient air concentrations of multiple criteria pollutants (O<sub>3</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, NO<sub>2</sub>, 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/RX2WTAWHTBGEVGOAMWFRLYCEJU/> (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](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.atlantaneewsfirst.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)

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<sup>7</sup> <https://fire.airnow.gov/>

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

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

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

<sup>11</sup> <https://airgeorgia.org/>

- <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<sub>2.5</sub> Wildland Fire Exceptional Events Tiering Document* outline the expected components of a clear causal relationship portion of a demonstration. These include evidence that emissions from wildfires were transported to the monitor, evidence that wildfire emissions affected the monitor, and a comparison of the event-related concentration to historical concentrations.

Figures B1-B5 (Appendix B) show smoke from the NOAA Hazard Mapping System (HMS), plotted via the AirNow Navigator<sup>12</sup>. Active fires and smoke are shown for the dates the event was measured 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.

The historical data analysis section of this demonstration focuses on 2019-2023 PM<sub>2.5</sub> FRM data at the Macon-Allied 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 nearly double the 5-year annual average, quarterly average, and monthly average, and in some cases can be almost three times greater.

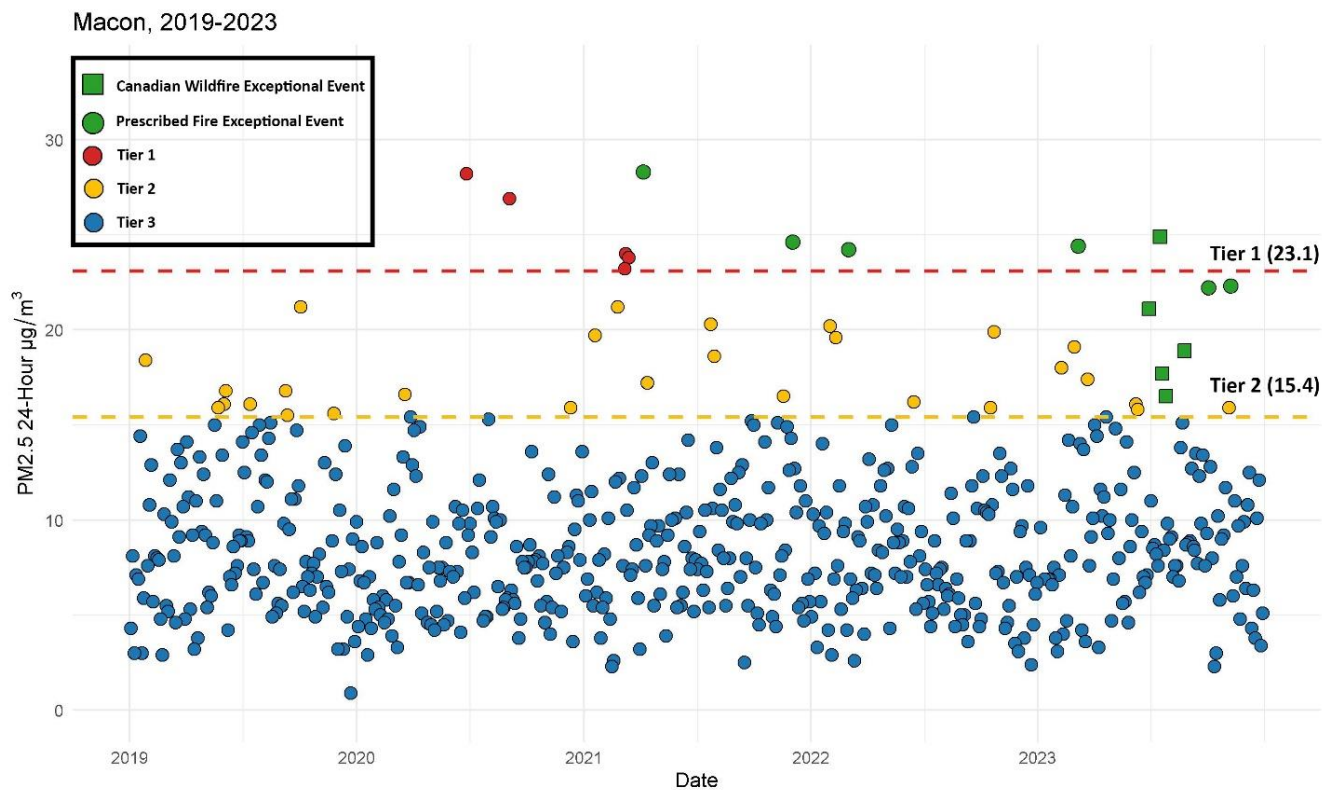
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<sup>12</sup> <https://airnowtech.org/navigator/>

**Table 3.** Comparison of exceptional event concentrations to historic 2019-2023 concentrations at the Macon-Allied site monitor (AQS ID: 13-021-0007).

EE Date	EE Concentration ( $\mu\text{g}/\text{m}^3$ )	5-Year Annual Average ( $\mu\text{g}/\text{m}^3$ )	5-Year Quarterly Average ( $\mu\text{g}/\text{m}^3$ )	5-Year Monthly Average ( $\mu\text{g}/\text{m}^3$ )	Ratio EE to 5-Year Annual Average	Ratio EE to 5-Year Quarterly Average	Ratio EE to 5-Year Monthly Average
6/29/2023	21.1	9.1	9.46	9.88	2.3	2.2	2.1
7/17/2023	24.9	9.1	9.30	9.64	2.7	2.7	2.6
7/20/2023	17.7	9.1	9.3	9.64	1.9	1.9	1.8
7/26/2023	16.5	9.1	9.3	9.64	1.8	1.8	1.7
8/25/2023	18.9	9.1	9.3	8.88	2.1	2.0	2.1

Figure 1 plots the 24-hour  $\text{PM}_{2.5}$  concentrations for 2019-2023. Exceedances caused by wild or prescribed fires are delineated by marker shape. Concentrations generally fall within the Tier 3 range, below  $15.4 \mu\text{g}/\text{m}^3$ , except when smoke from fires is present. One of the selected exceptional events days is above the Tier 1 threshold of  $23.1 \mu\text{g}/\text{m}^3$ , and the remaining four fall within the Tier 2 range (greater than  $15.4 \mu\text{g}/\text{m}^3$ , less than  $23.1 \mu\text{g}/\text{m}^3$ ). Tier 1 events are 1.5 times greater than the highest 98<sup>th</sup> percentile of data over the last 5 years. Tier 2 events are greater than or equal to a threshold of the minimum annual 98<sup>th</sup> percentile for 24-hour  $\text{PM}_{2.5}$  data over the previous 5-years, but less than 1.5 times this threshold, per the EPA’s Tiering Tool.



**Figure 1.** 24-hour  $\text{PM}_{2.5}$  concentrations for 2019-2023 observed at the Macon-Allied 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<sub>2.5</sub> concentrations across the United States, and HYSPLIT back-trajectories. These trajectories originate at the Macon-Allied 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<sub>2.5</sub> concentrations, and air quality indices (AQIs) in the southeast of the United States. Figures in Appendix F show upper air maps from the Storm Prediction Center<sup>13</sup> for the event day and three days prior. Maps are displayed at pressures of either 850 millibar (mb), equivalent to 1170-1590 m above mean sea level (MSL), or 700 mb, equivalent to 2350-3150 m MSL<sup>14</sup> on midnight or noon (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 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<sub>2.5</sub> concentrations were elevated above the 9.0 µg/m<sup>3</sup> 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 by the monitor is a mixture of emissions from fires in provinces of British Columbia, Alberta, Saskatchewan, Ontario, and Quebec. The back-trajectories converge spatially approximately 18 hours before descending to near-surface level where observed, daily PM<sub>2.5</sub> concentrations increased to 21.1 µg/m<sup>3</sup>. 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<sub>2.5</sub> concentrations were elevated above the 9.0 µg/m<sup>3</sup> standard around 6:00 PM ET on June 16 and remained elevated throughout the event day. Shown in Figure C2, 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 by the monitor is a mixture of emissions from fires in provinces of British Columbia, Alberta, and Saskatchewan. The back-trajectories converge spatially approximately one day before descending to near-surface level where observed, daily PM<sub>2.5</sub> concentrations increased to 24.9 µg/m<sup>3</sup>. Figure D2 shows that this

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<sup>13</sup> <https://www.spc.noaa.gov/obswx/maps/>

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

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).

#### July 20, 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<sub>2.5</sub> concentrations were elevated above the 9.0 µg/m<sup>3</sup> standard throughout July 19 and subsided by 8:00 PM ET on the event day. Shown in Figure C3, back-trajectories indicate that the smoke plume traveled from southern states to the west of Georgia. Wildfires were active largely in western Canada at this time. Wind barbs from Figures F1-F5 (spanning a timeframe of July 17-21) 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, 19, and 20 (Figures F2-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 Macon-Allied field site. As a result, the plume detected by the monitor is a mixture of emissions from fires in provinces of British Columbia, Alberta, and Saskatchewan. This led to daily PM<sub>2.5</sub> concentrations increasing to 17.7 µg/m<sup>3</sup>. Figure D3 shows that this enhancement occurred synchronously with elevated concentrations reported by monitors across the south and southeast, which follows from the large blanket of smoke over this region (Figure B3).

#### July 26, 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<sub>2.5</sub> concentrations were elevated above the 9.0 µg/m<sup>3</sup> standard around throughout the event day and the day prior. Shown in Figure C4, back-trajectories indicate that the smoke plume traveled through the Midwest of the United States. Additionally, wildfires were active largely in western Canada. As a result, the plume detected by the monitor is a mixture of emissions from fires in provinces of British Columbia, Alberta, and Saskatchewan. The back-trajectories converge spatially approximately 16 hours before descending to near-surface level where observed, daily PM<sub>2.5</sub> concentrations increased to 16.5 µg/m<sup>3</sup>. Figure D4 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 B4).

#### August 25, 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. Additionally, wildfires were active largely in western Canada, with virtually no active fires in Quebec. From Figure E5, PM<sub>2.5</sub> concentrations were elevated above the 9.0 µg/m<sup>3</sup> standard throughout the event day and the day prior. Shown in Figure C5, back-trajectories indicate that the smoke plume traveled through either the Midwest or along the east coast 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, and Saskatchewan. Daily PM<sub>2.5</sub> concentrations increased to 18.9 µg/m<sup>3</sup>. Figure D5 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 B5).

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; 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 (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<sub>2.5</sub> 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.

# Appendix A: Active Wildfires in Canada

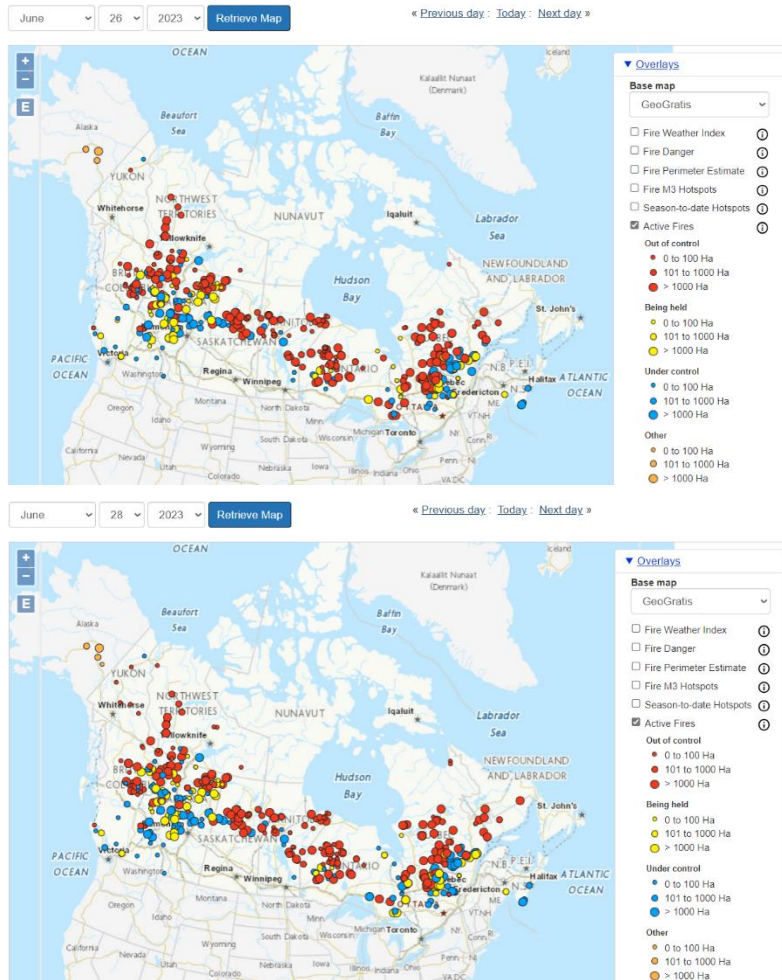
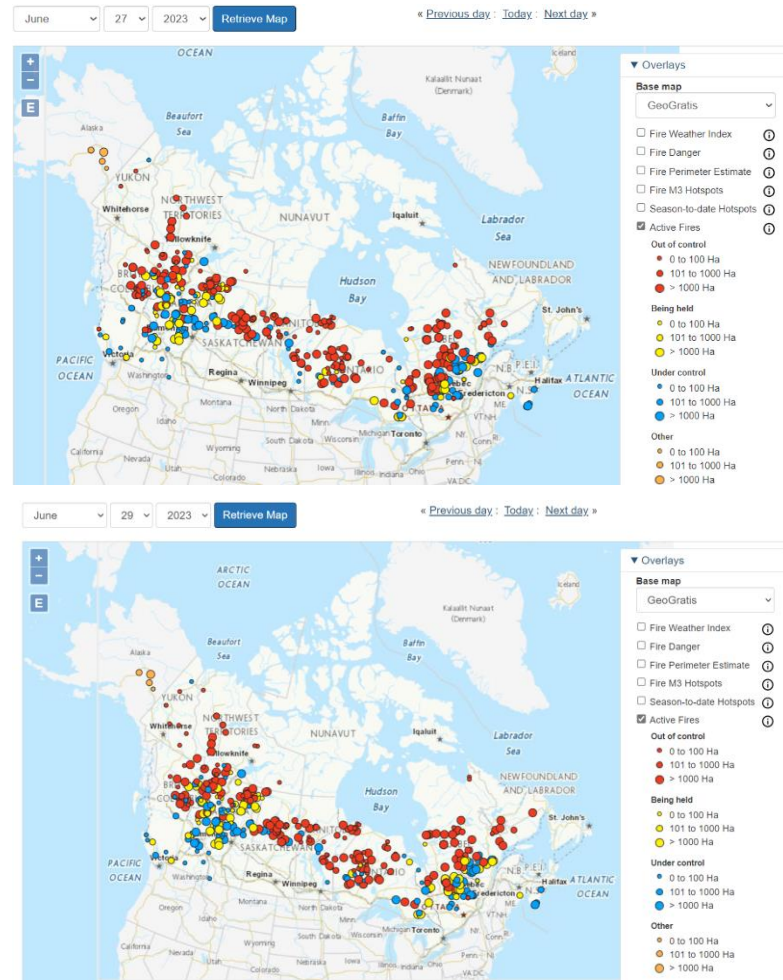


Figure A1. Active wildfires in Canada on June 26-29, 2023.



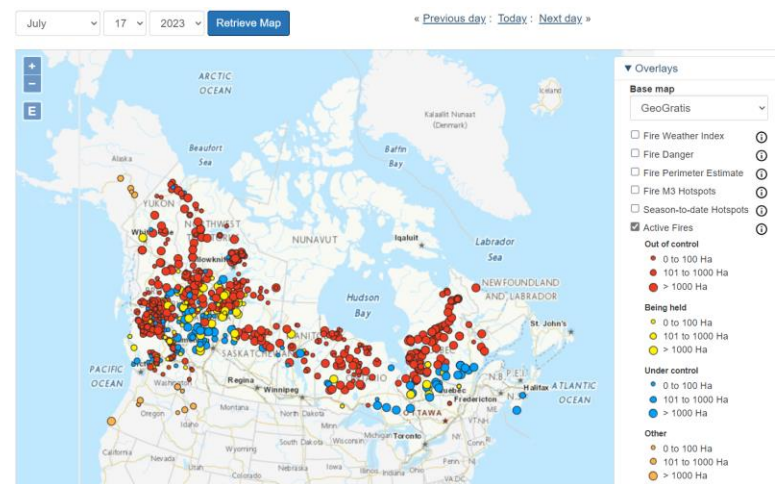
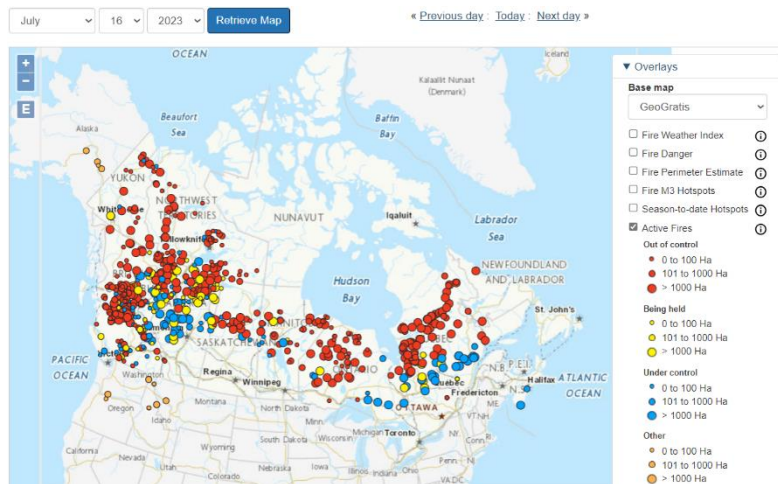
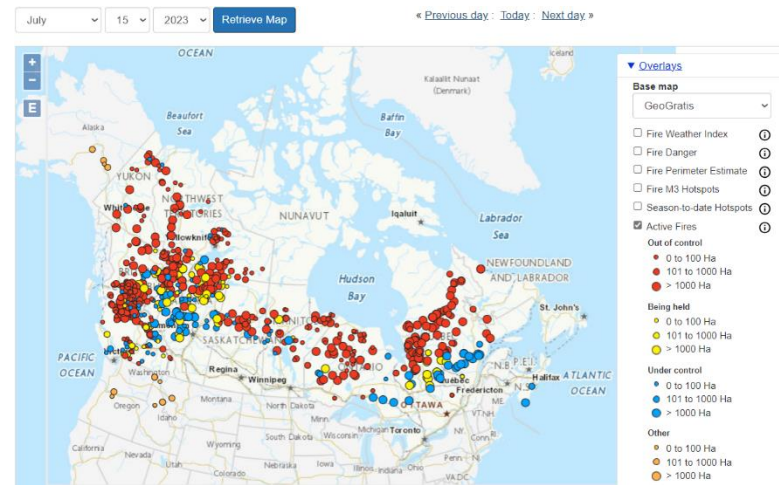
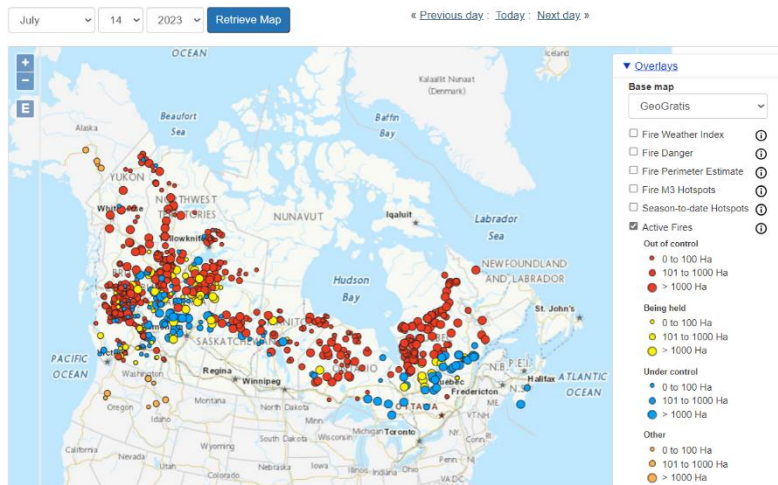


Figure A2. Active wildfires in Canada on July 14-17, 2023.

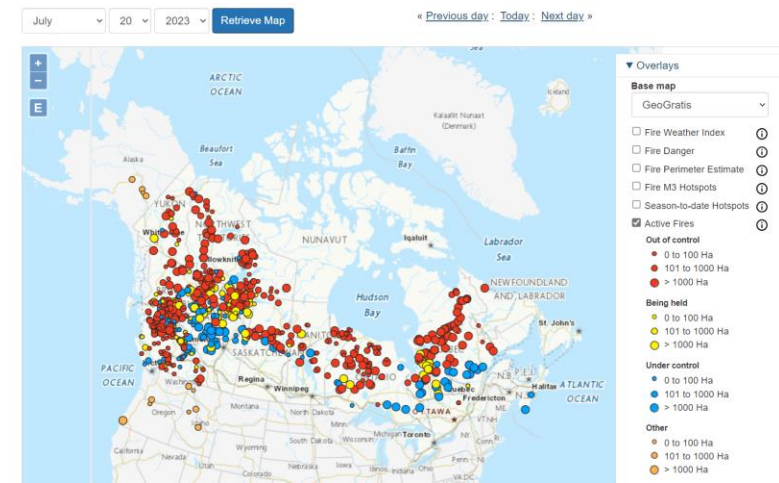
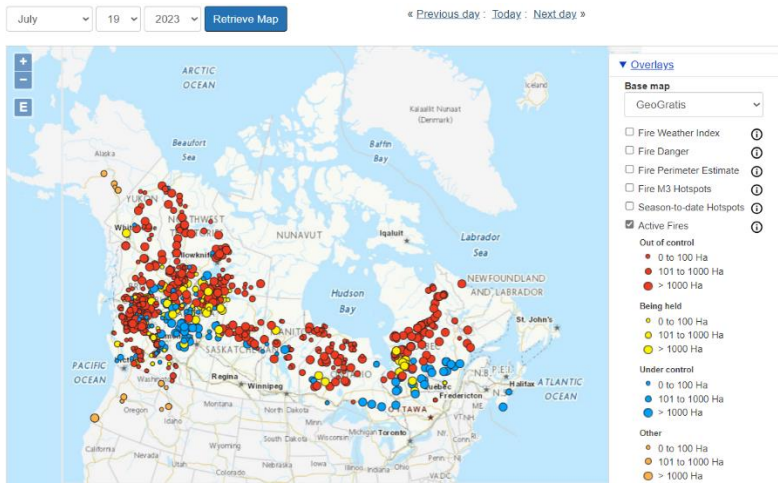
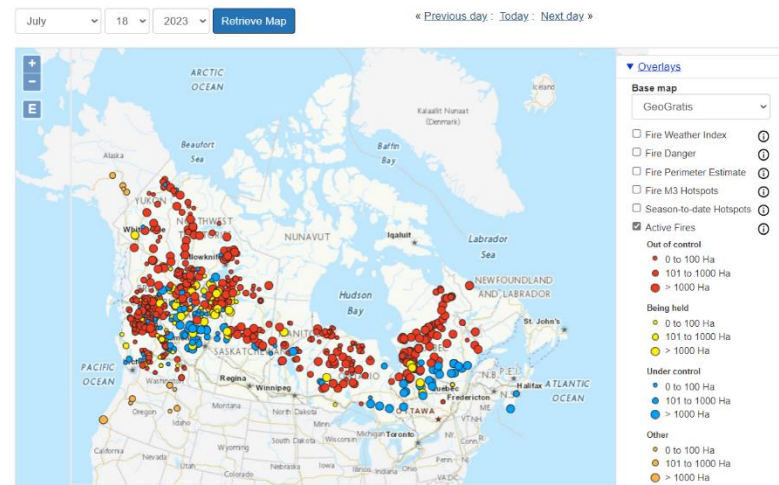
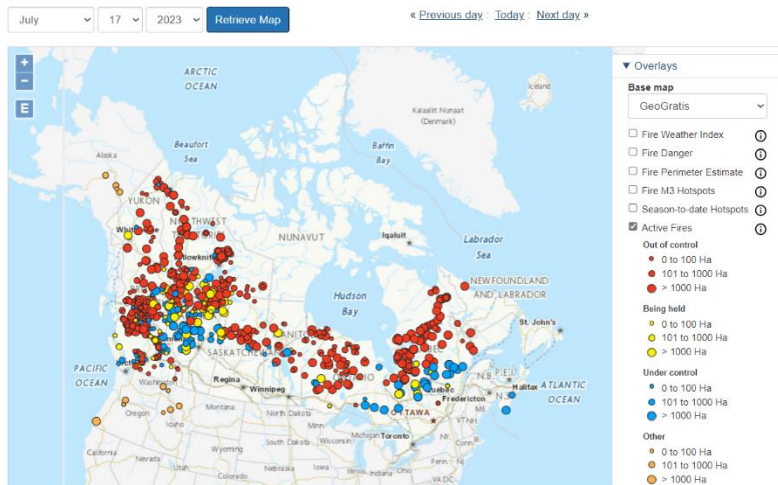
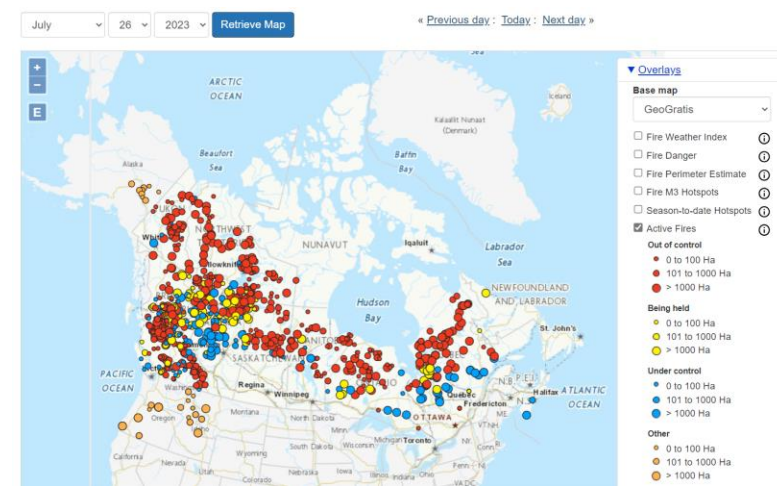
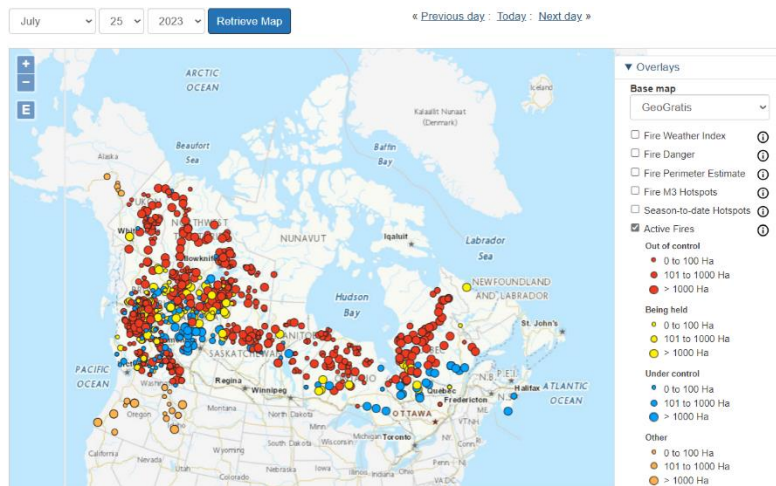
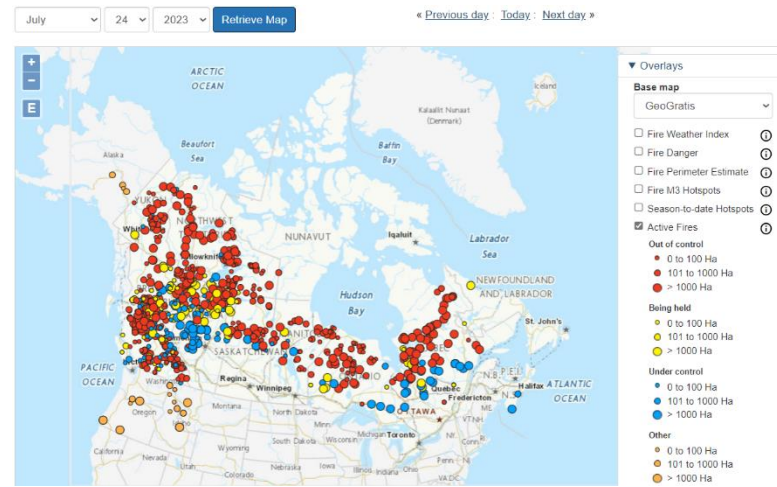
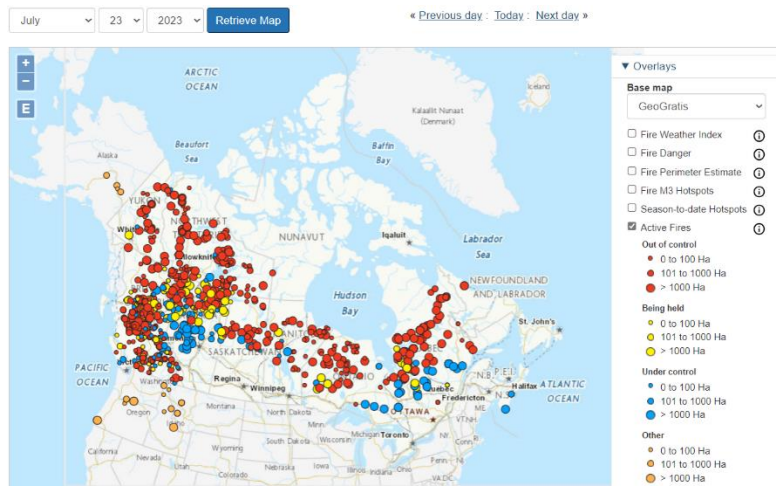


Figure A3. Active wildfires in Canada on July 17-20, 2023.



**Figure A4.** Active wildfires in Canada on July 23-26, 2023.

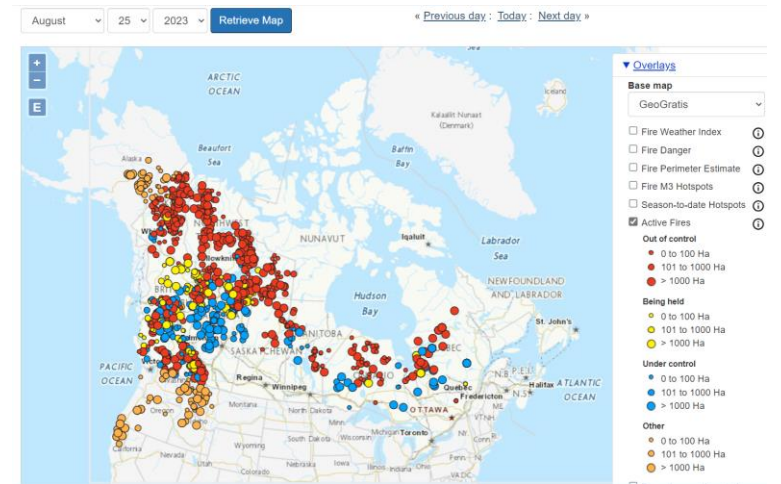
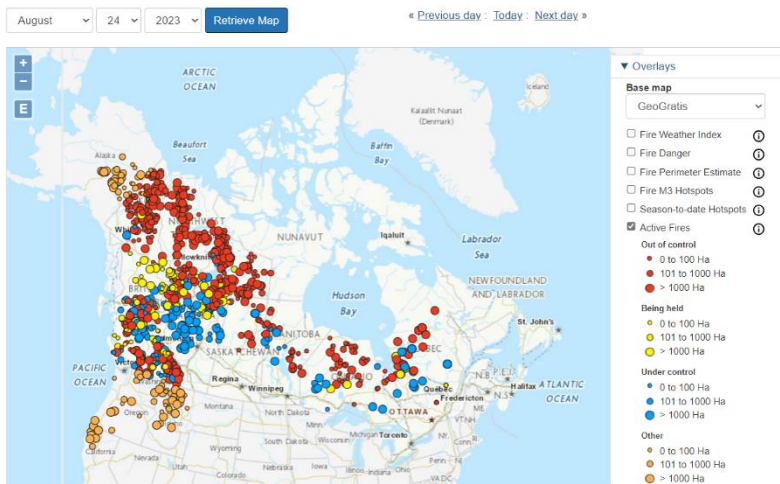
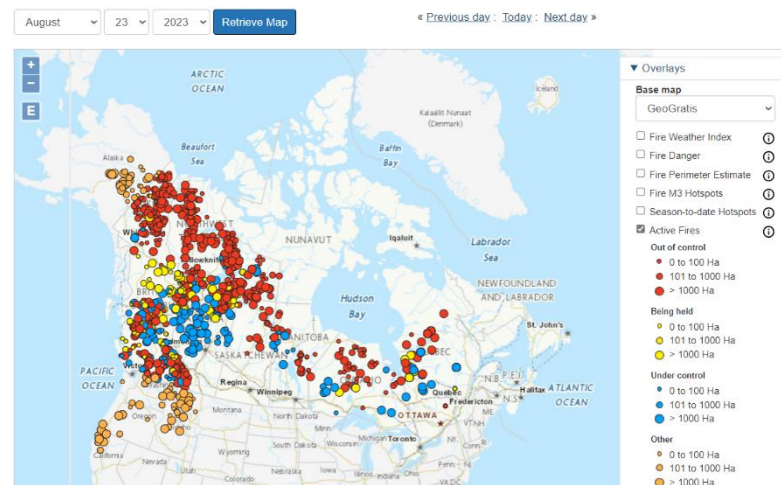
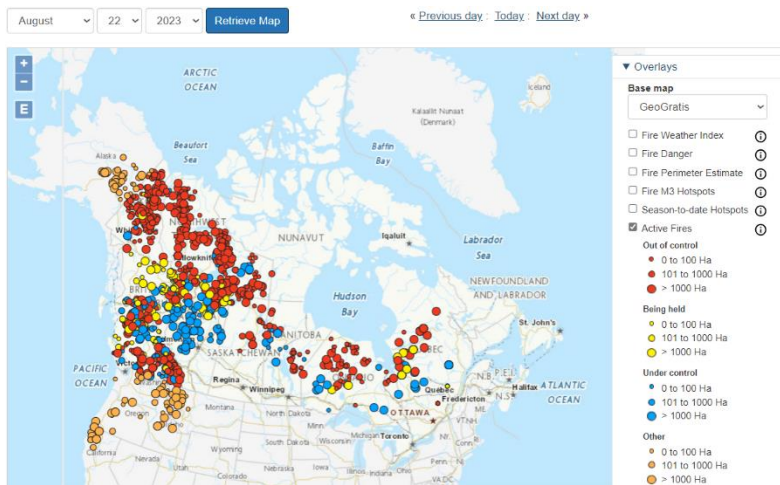
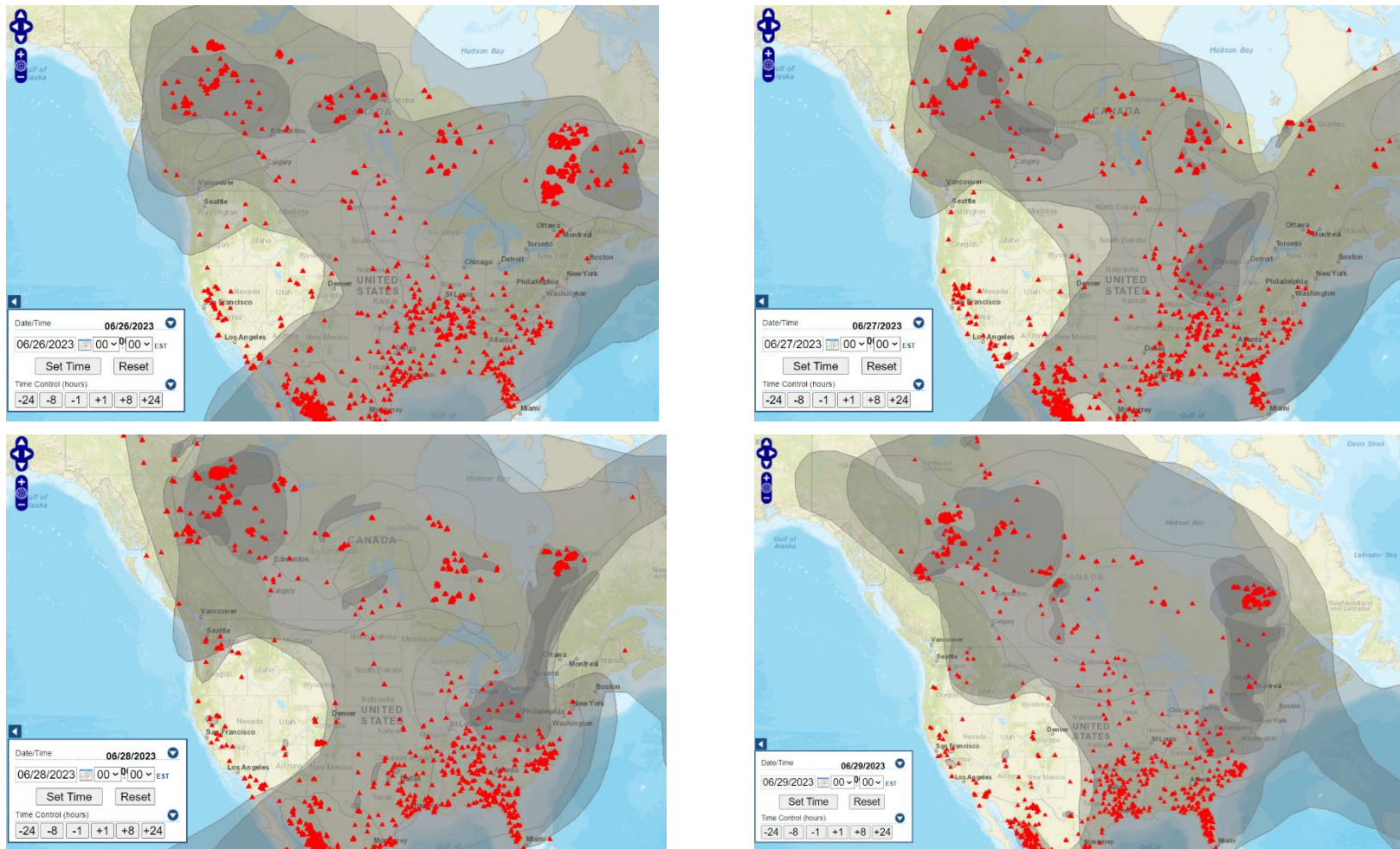


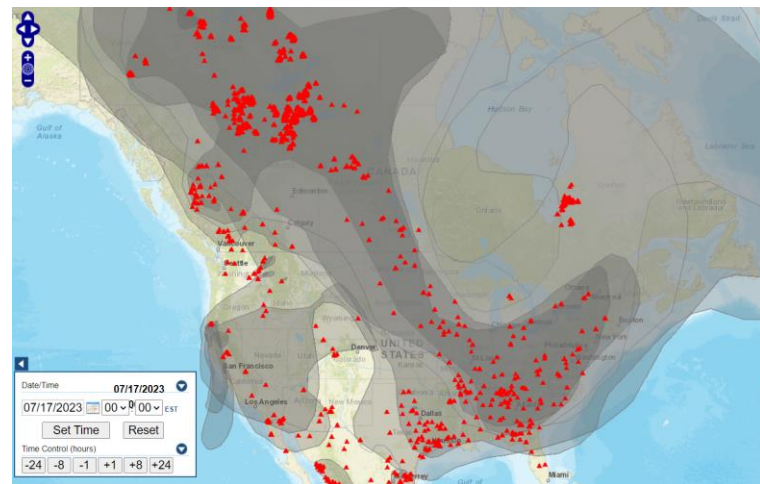
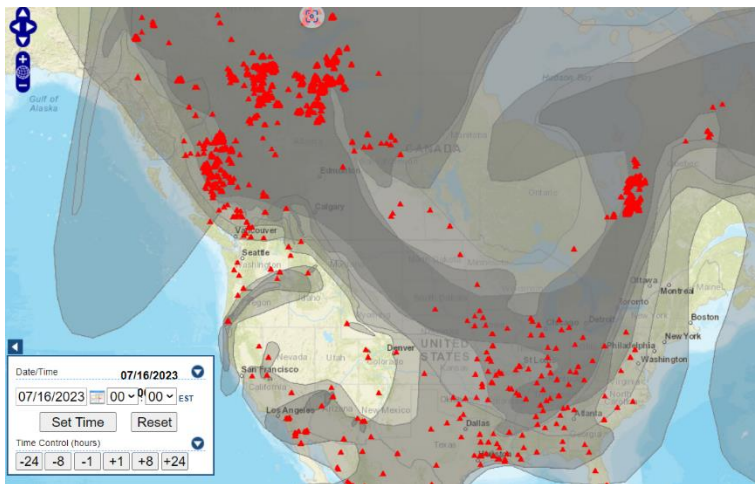
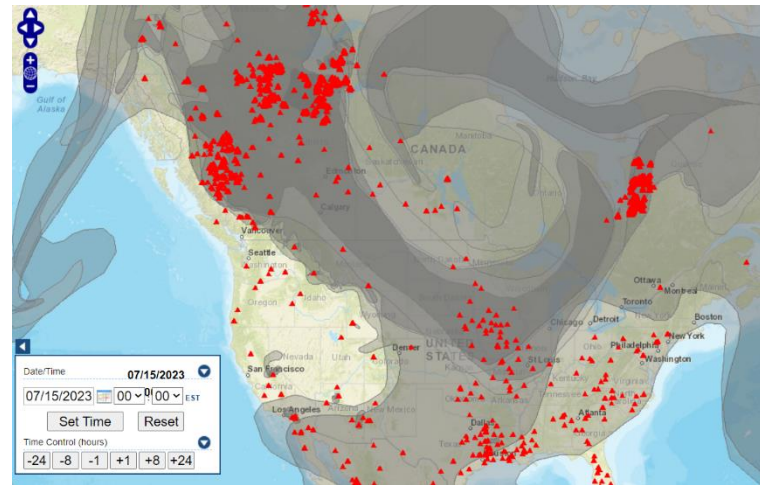
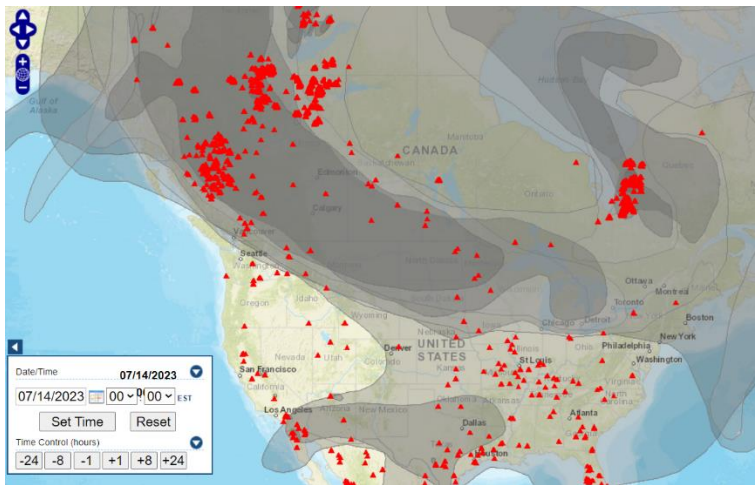
Figure A5. Active wildfires in Canada on August 22-25, 2023.



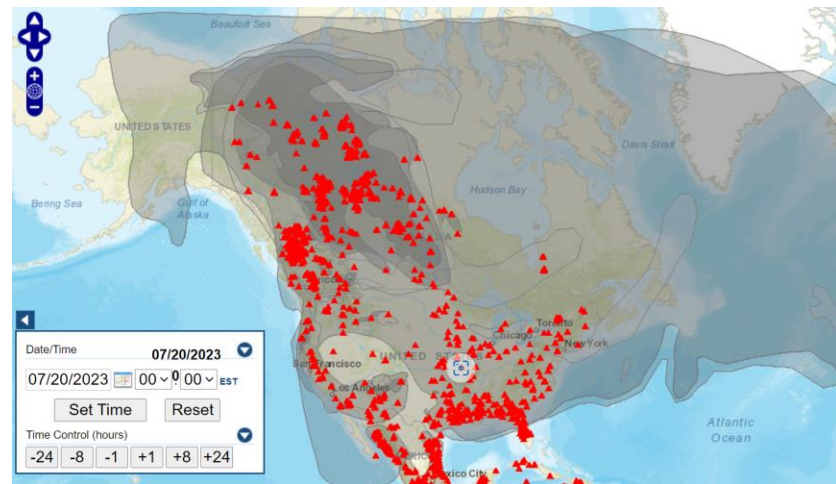
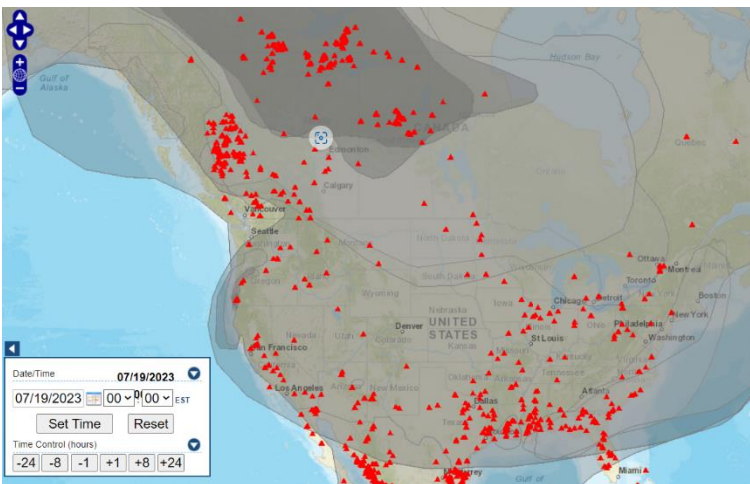
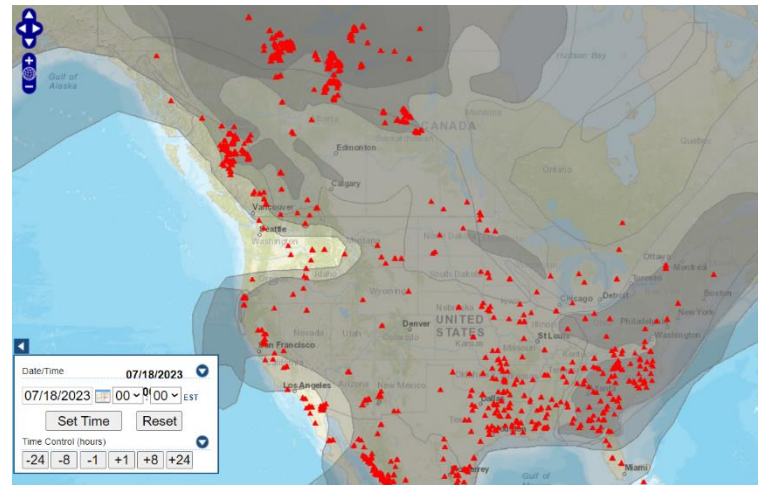
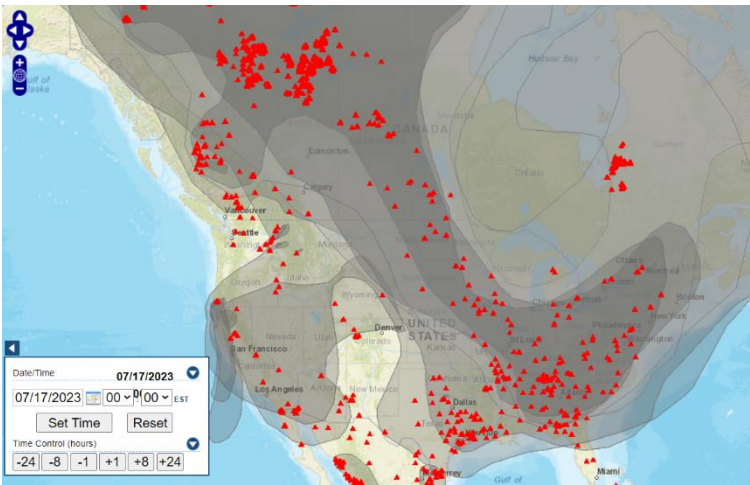
## Appendix B: HMS Smoke and Active Fires



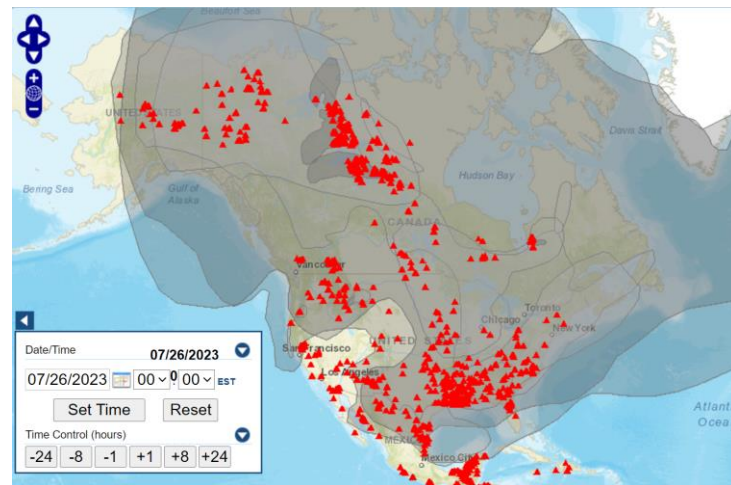
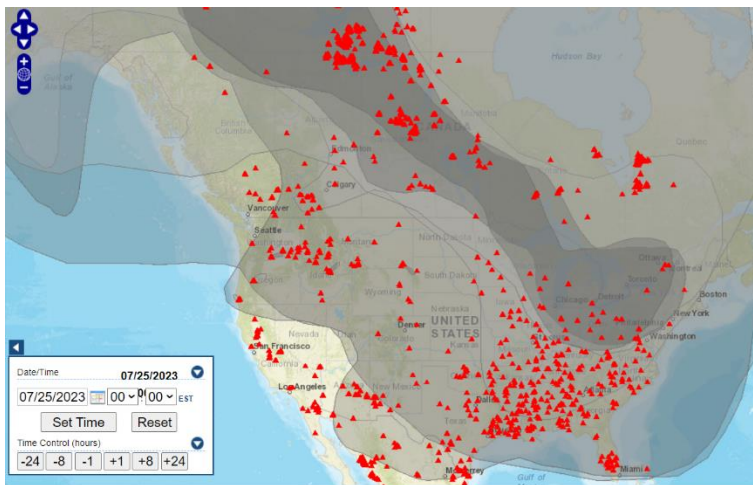
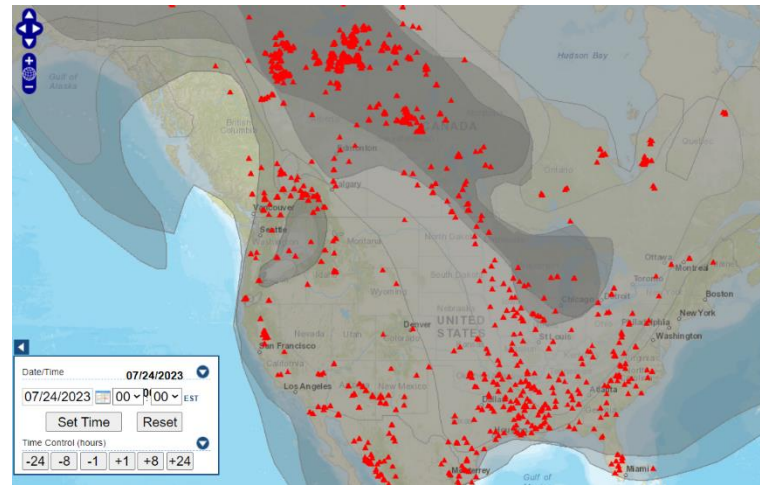
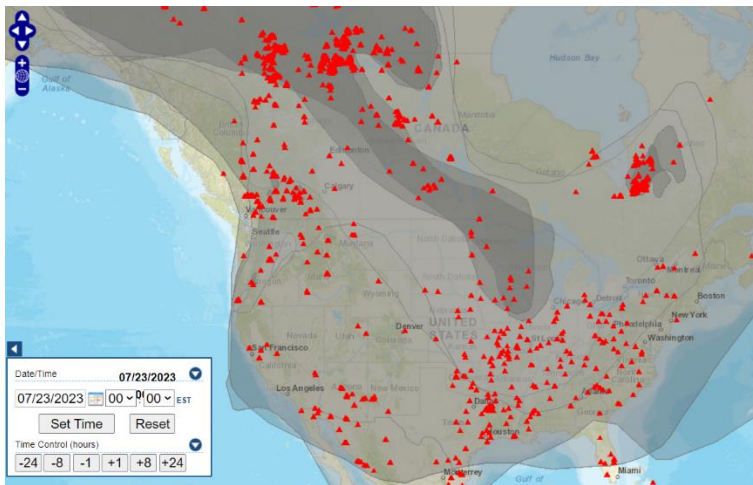
**Figure B1.** Map from the AirNow Navigator showing active fires (red) and smoke (grey) on June 26-29, 2023, plotted using the NOAA HMS over North America.



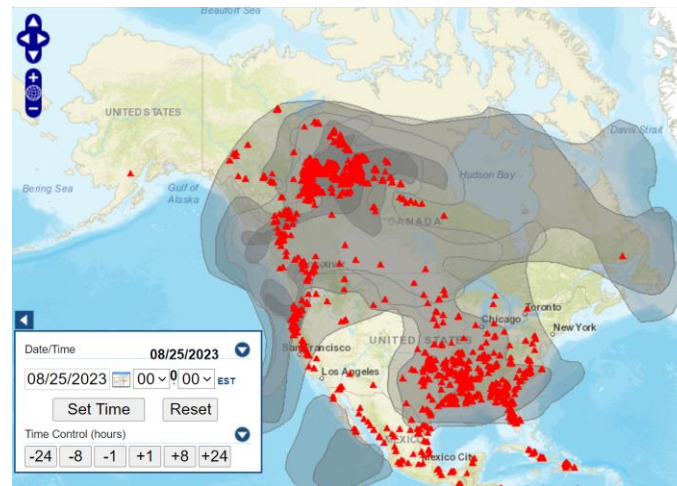
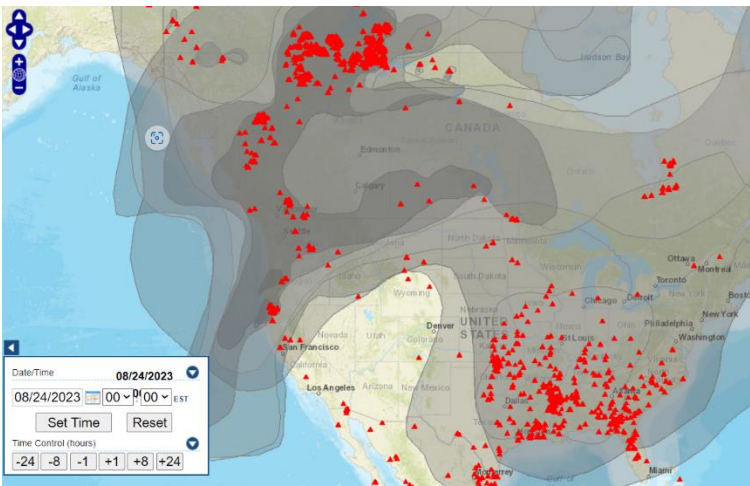
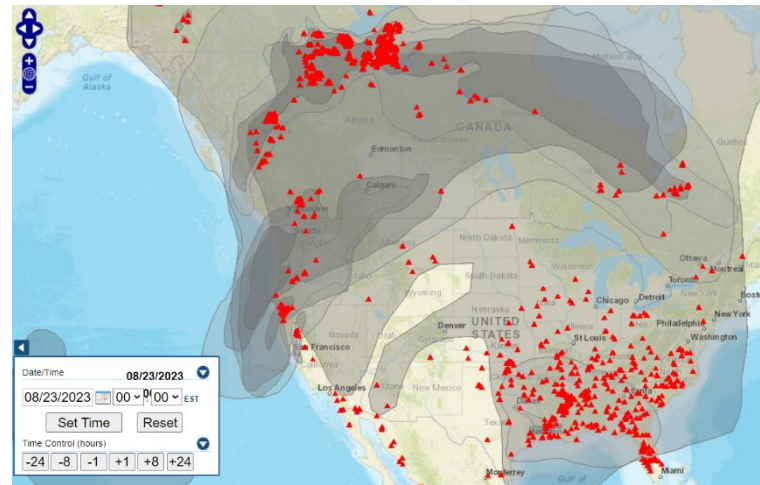
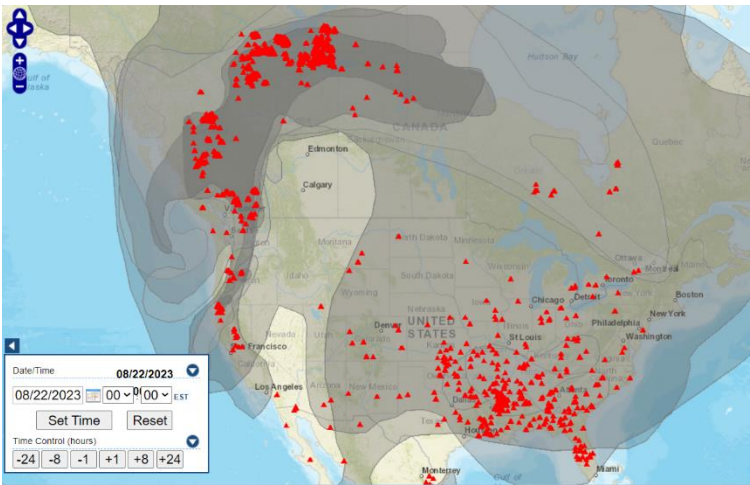
**Figure B2.** Map from the AirNow Navigator showing active fires (red) and smoke (grey) on July 14-17, 2023, plotted using the NOAA HMS over North America.



**Figure B3.** Map from the AirNow Navigator showing active fires (red) and smoke (grey) on July 17-20, 2023, plotted using the NOAA HMS over North America.

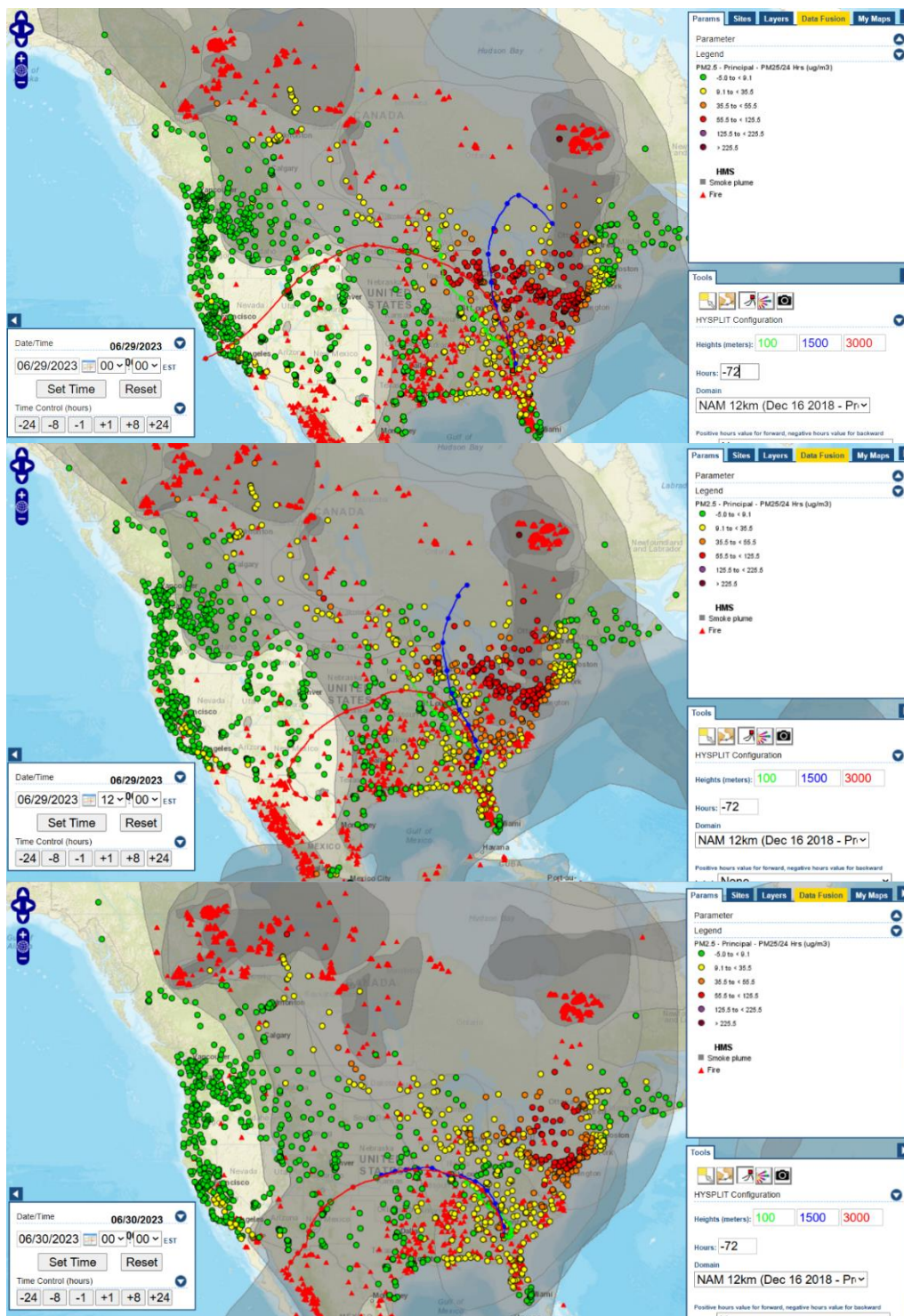


**Figure B4.** Map from the AirNow Navigator showing active fires (red) and smoke (grey) on July 23-26, 2023, plotted using the NOAA HMS over North America.

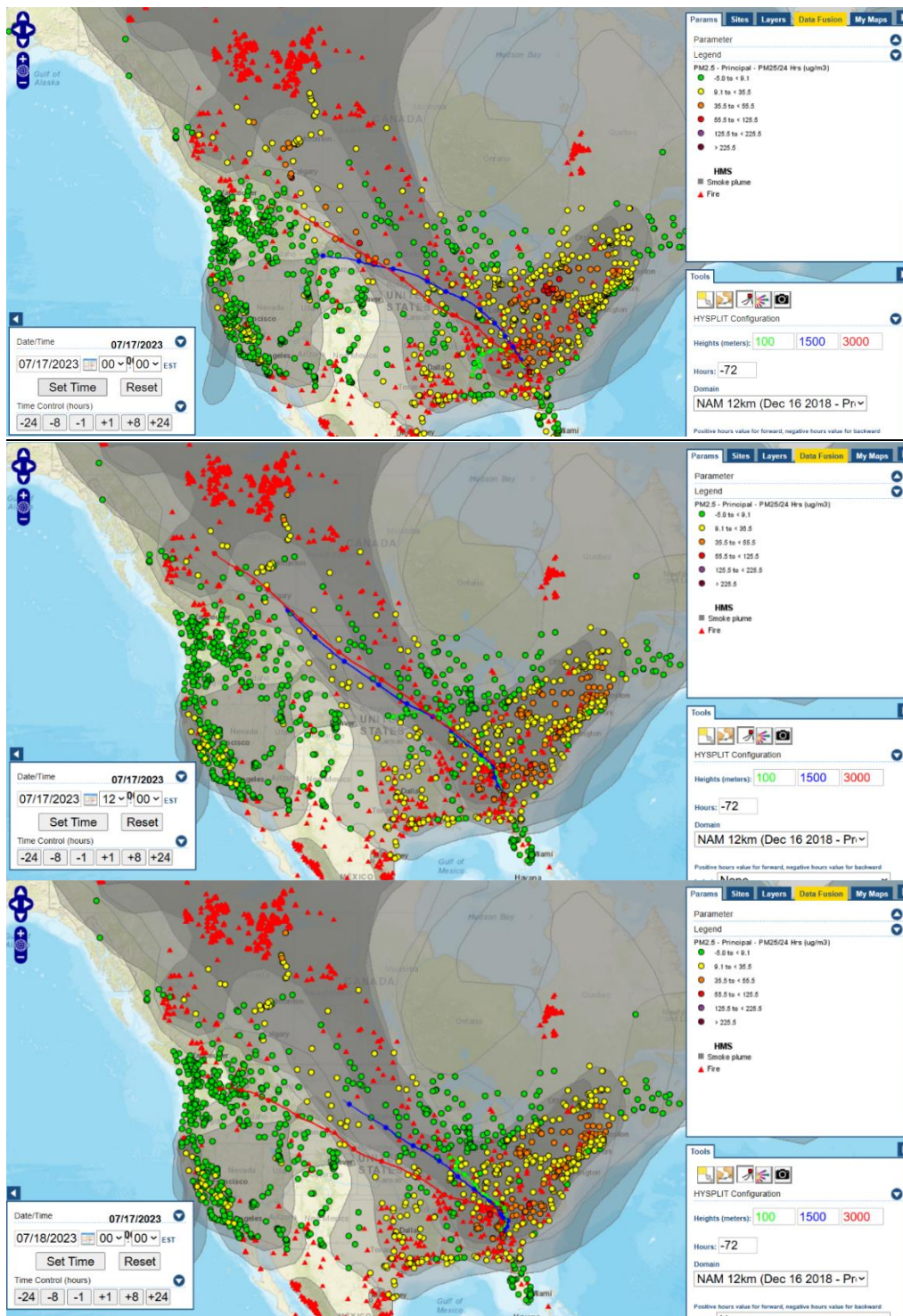


**Figure B5.** Map from the AirNow Navigator showing active fires (red) and smoke (grey) on August 22-25, 2023, plotted using the NOAA HMS over North America.

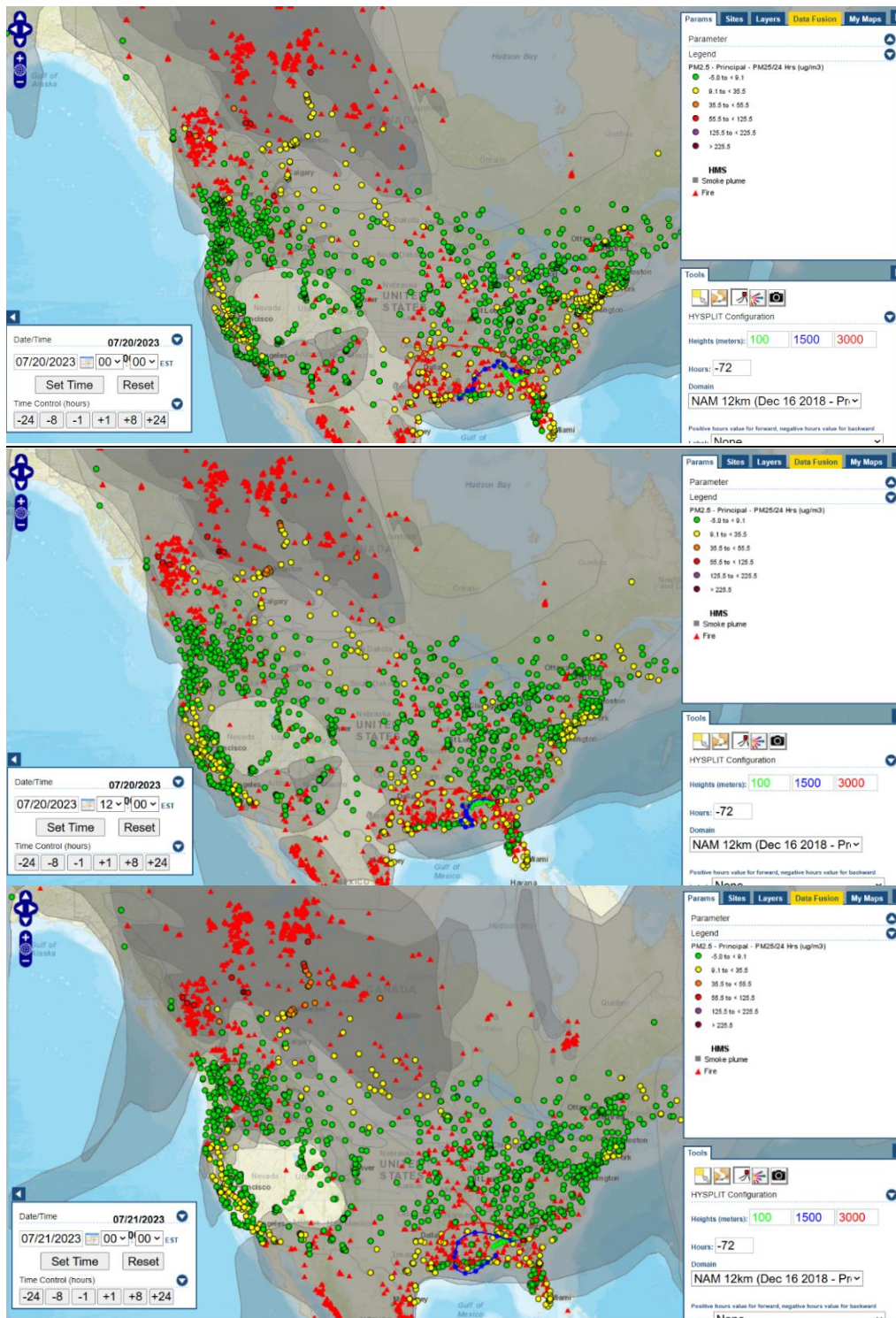
## Appendix C: HYSPLIT Back-Trajectory Maps



**Figure C1.** Map of HMS smoke plumes (grey polygons) and fires (red triangles), daily PM<sub>2.5</sub> 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).

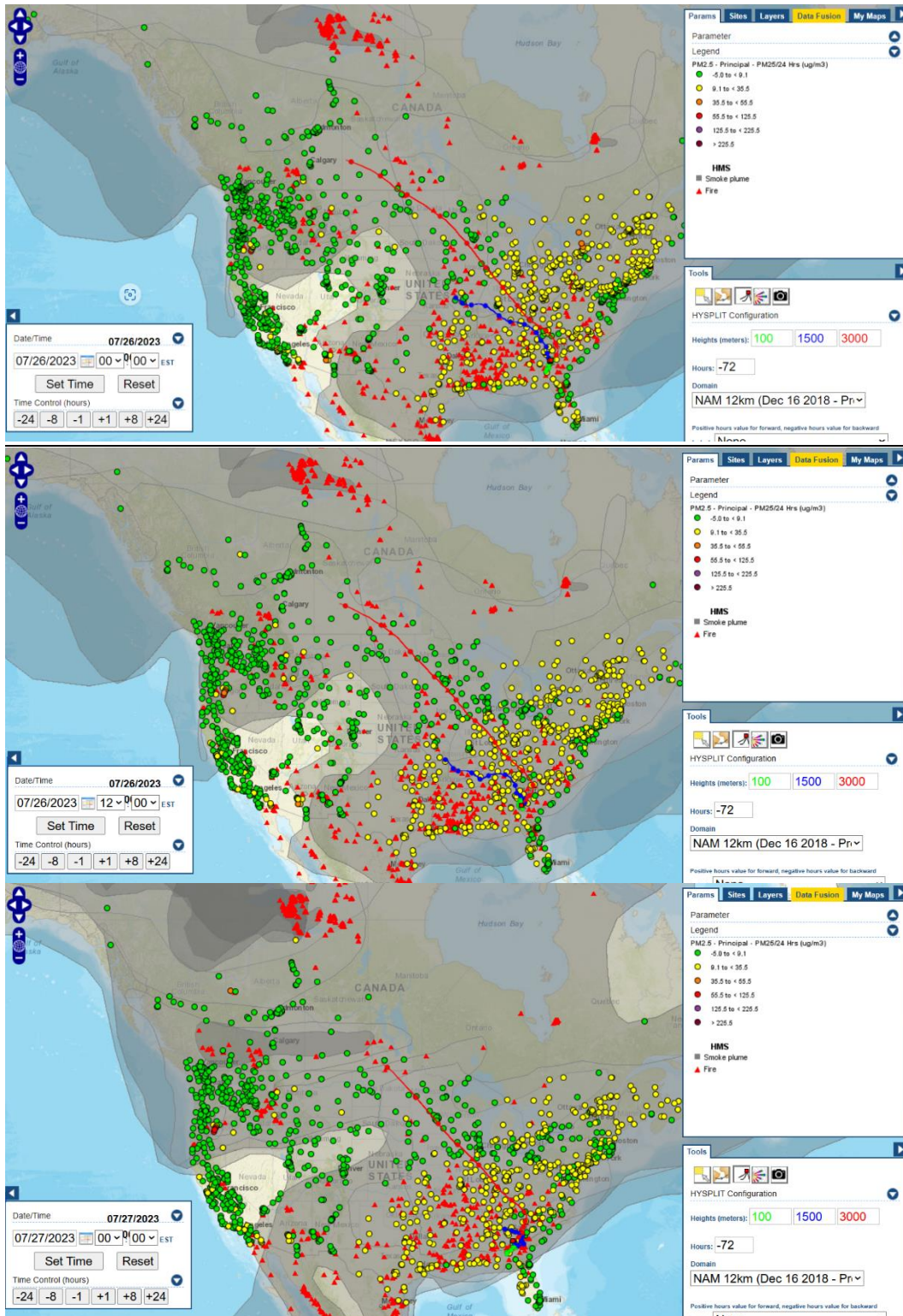


**Figure C2.** Map of HMS smoke plumes (grey polygons) and fires (red triangles), daily PM<sub>2.5</sub> concentrations (circles), and HYSPLIT back-trajectories of release heights at 100 m (green lines), 1500 m (blue lines), and 3000 m (red lines) for 0 AM EST on July 17, 2023 (top), 12 PM EST on July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

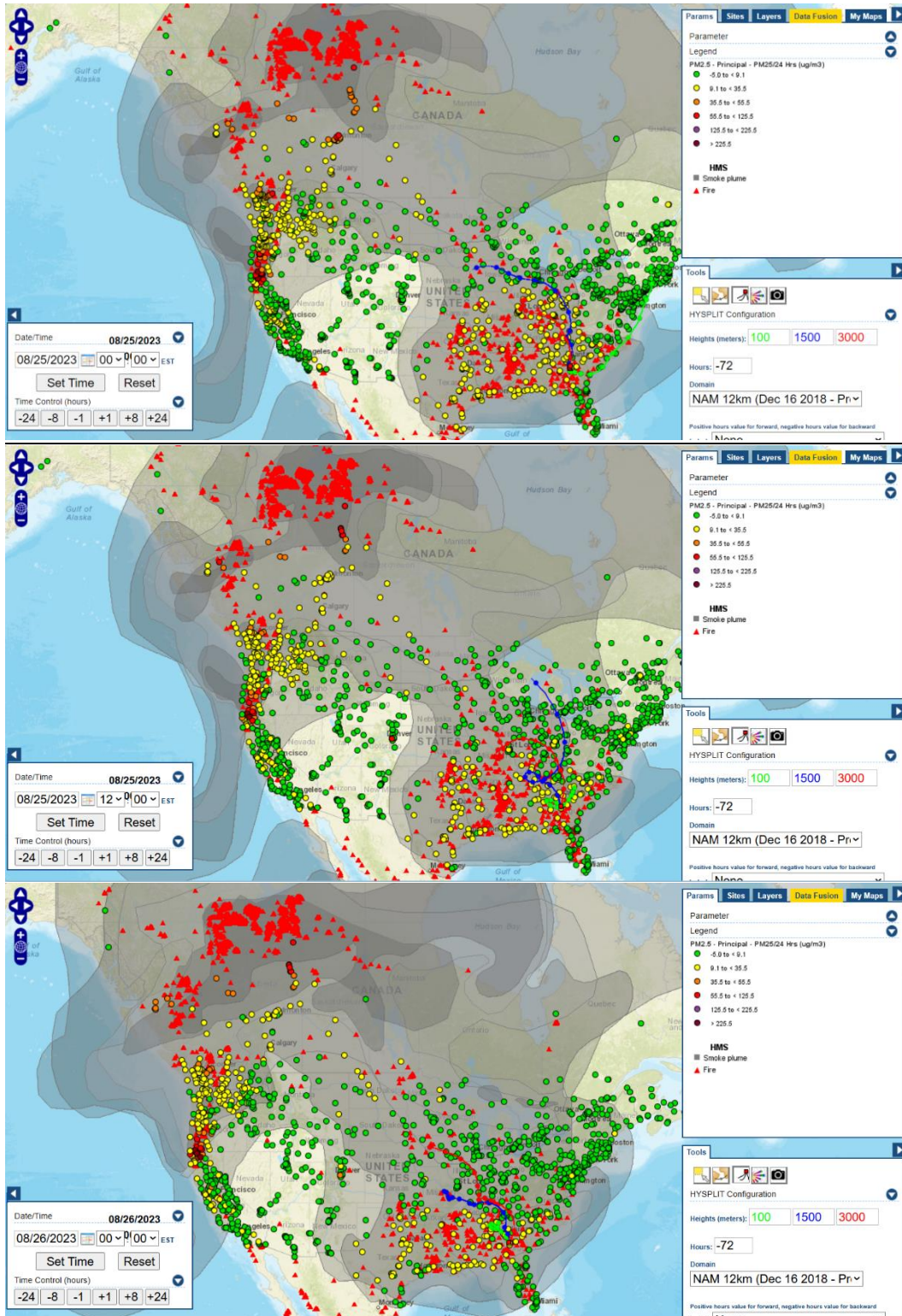


**Figure C3.** Map of HMS smoke plumes (grey polygons) and fires (red triangles), daily PM<sub>2.5</sub> concentrations (circles), and HYSPLIT back-trajectories of release heights at 100 m (green lines), 1500 m (blue lines), and 3000 m (red lines) for 0 AM EST on July 20, 2023 (top), 12 PM EST on July 20, 2023 (middle), and 0 AM EST on July 21, 2023 (bottom).





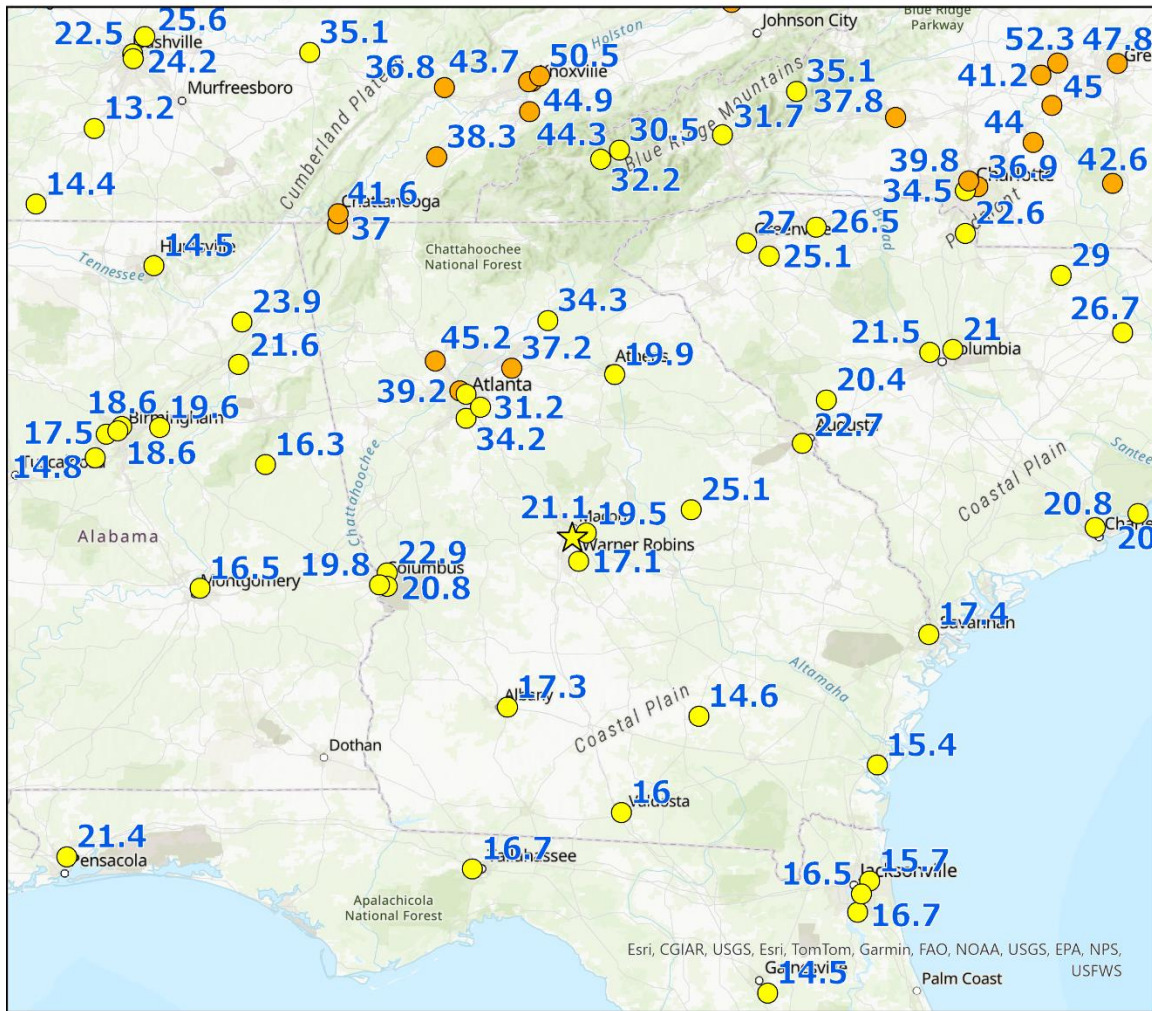
**Figure C4.** Map of HMS smoke plumes (grey polygons) and fires (red triangles), daily PM<sub>2.5</sub> concentrations (circles), and HYSPLIT back-trajectories of release heights at 100 m (green lines), 1500 m (blue lines), and 3000 m (red lines) for 0 AM EST on July 26, 2023 (top), 12 PM EST on July 26, 2023 (middle), and 0 AM EST on July 27, 2023 (bottom).



**Figure C5.** Map of HMS smoke plumes (grey polygons) and fires (red triangles), daily PM<sub>2.5</sub> 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 August 25, 2023 (top), 12 PM EST on August 25, 2023 (middle), and 0 AM EST on August 26, 2023 (bottom).

Appendix D: PM<sub>2.5</sub> Surface Concentrations in the Southeast

**June 29, 2023 PM<sub>2.5</sub> Exceedance Report**

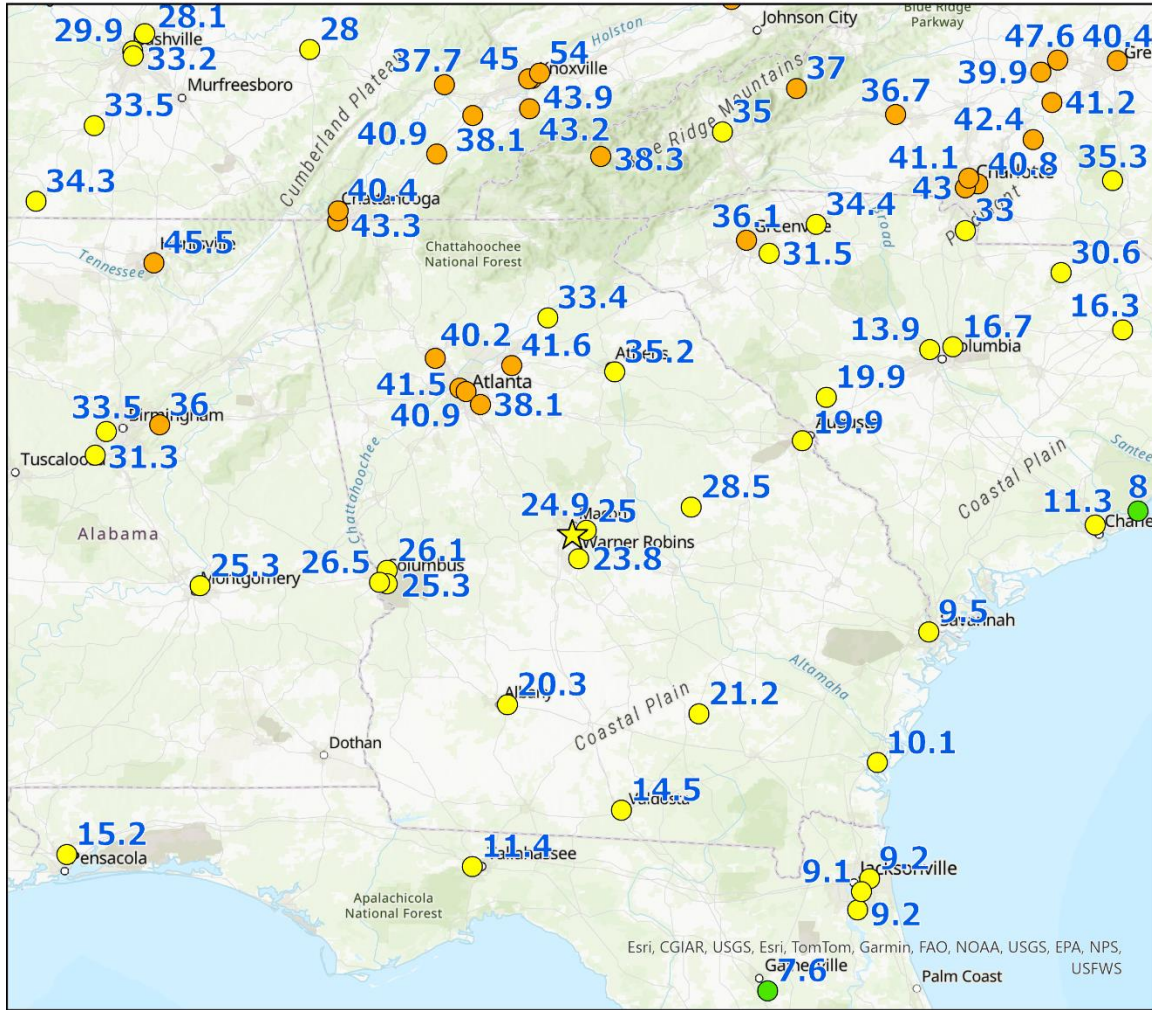


**AQI category - 24-hr average PM<sub>2.5</sub>**

- Good (0-9 ug/m<sup>3</sup>)
- Moderate (9.1-35.4 ug/m<sup>3</sup>)
- Unhealthy for sensitive (35.5-55.4 ug/m<sup>3</sup>)
- Unhealthy (55.5-150.4 ug/m<sup>3</sup>)
- Very unhealthy (150.4-250.4 ug/m<sup>3</sup>)
- Hazardous (>250.4 ug/m<sup>3</sup>)

**Figure D1.** Surface level, daily PM<sub>2.5</sub> concentrations on June 29, 2023, across the southeast. The Macon-Allied monitoring site is represented by a star. Numerous sites measured concentrations that exceeded the level of annual PM<sub>2.5</sub> NAAQS.

# July 17, 2023 PM<sub>2.5</sub> Exceedance Report

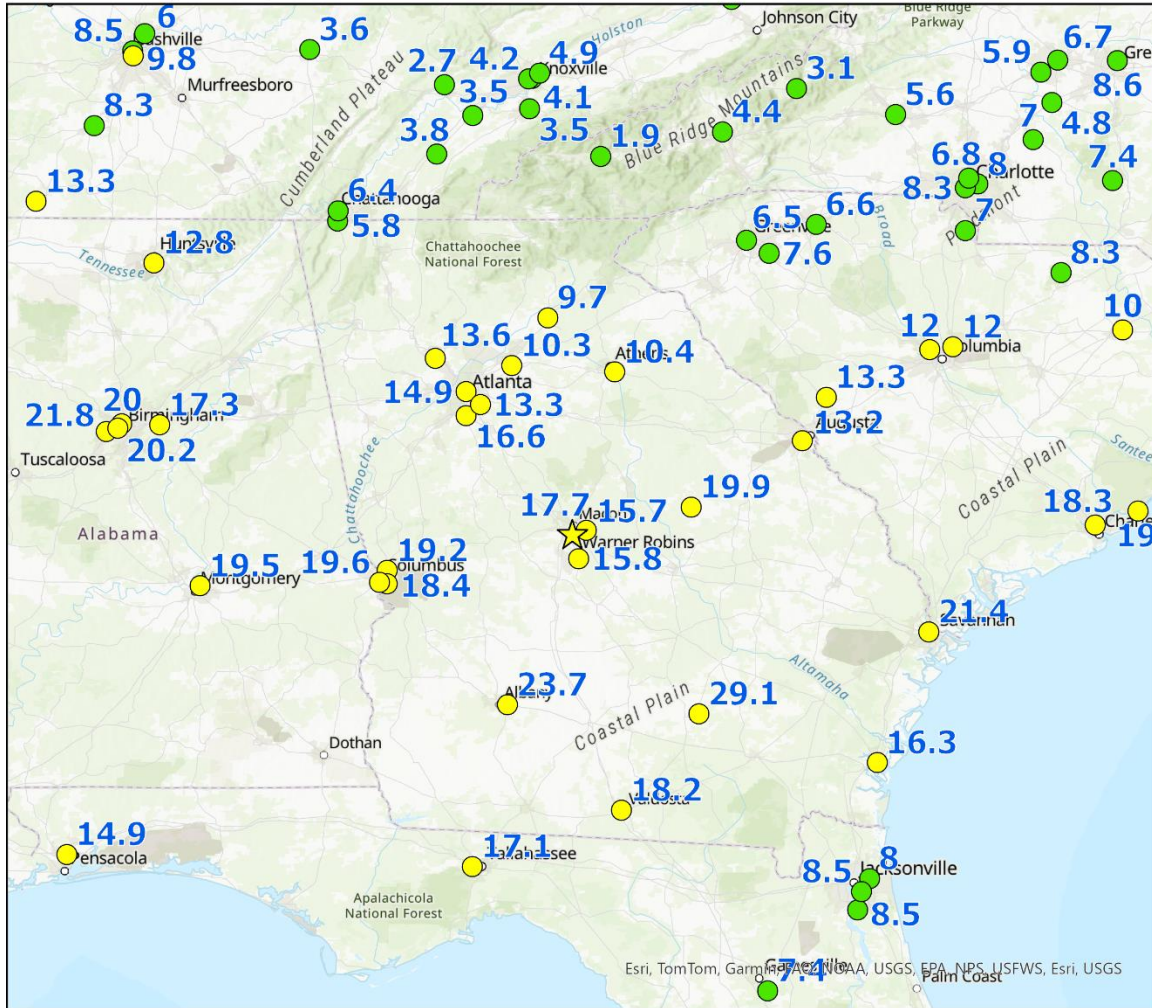


## AQI category - 24-hr average PM<sub>2.5</sub>

- Good (0-9 ug/m<sup>3</sup>)
- Moderate (9.1-35.4 ug/m<sup>3</sup>)
- Unhealthy for sensitive (35.5-55.4 ug/m<sup>3</sup>)
- Unhealthy (55.5-150.4 ug/m<sup>3</sup>)
- Very unhealthy (150.4-250.4 ug/m<sup>3</sup>)
- Hazardous (>250.4 ug/m<sup>3</sup>)

**Figure D2.** Surface level, daily PM<sub>2.5</sub> concentrations on July 17, 2023, across the southeast. The Macon-Allied monitoring site is represented by a star. Numerous sites measured concentrations that exceeded the level of annual PM<sub>2.5</sub> NAAQS.

# July 20, 2023 PM<sub>2.5</sub> Exceedance Report

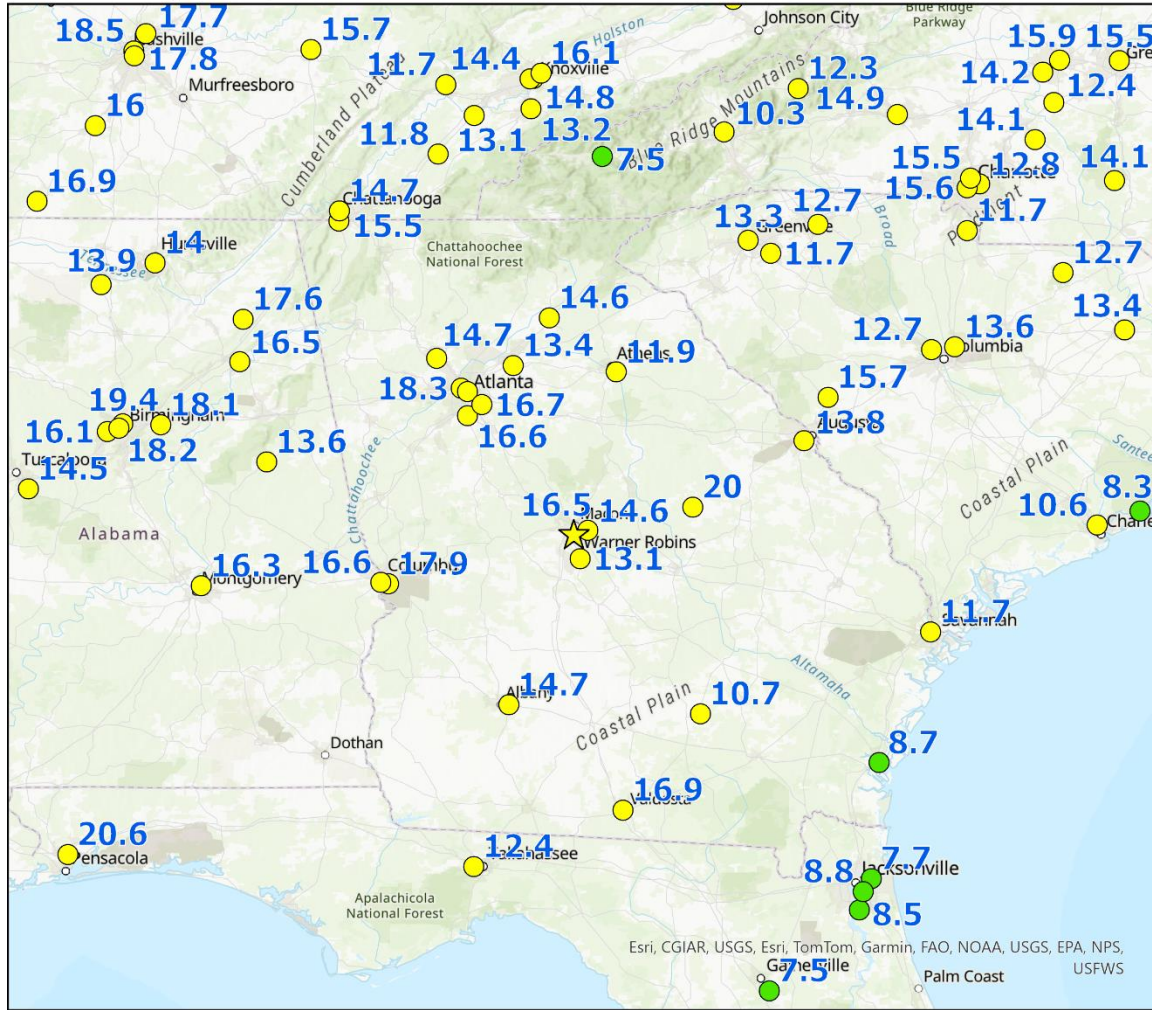


## AQI category - 24-hr average PM<sub>2.5</sub>

- Good (0-9 ug/m<sup>3</sup>)
- Moderate (9.1-35.4 ug/m<sup>3</sup>)
- Unhealthy for sensitive (35.5-55.4 ug/m<sup>3</sup>)
- Unhealthy (55.5-150.4 ug/m<sup>3</sup>)
- Very unhealthy (150.4-250.4 ug/m<sup>3</sup>)
- Hazardous (>250.4 ug/m<sup>3</sup>)

**Figure D3.** Surface level, daily PM<sub>2.5</sub> concentrations on July 20, 2023, across the southeast. The Macon-Allied monitoring site is represented by a star. Numerous sites measured concentrations that exceeded the level of annual PM<sub>2.5</sub> NAAQS.

# July 26, 2023 PM<sub>2.5</sub> Exceedance Report

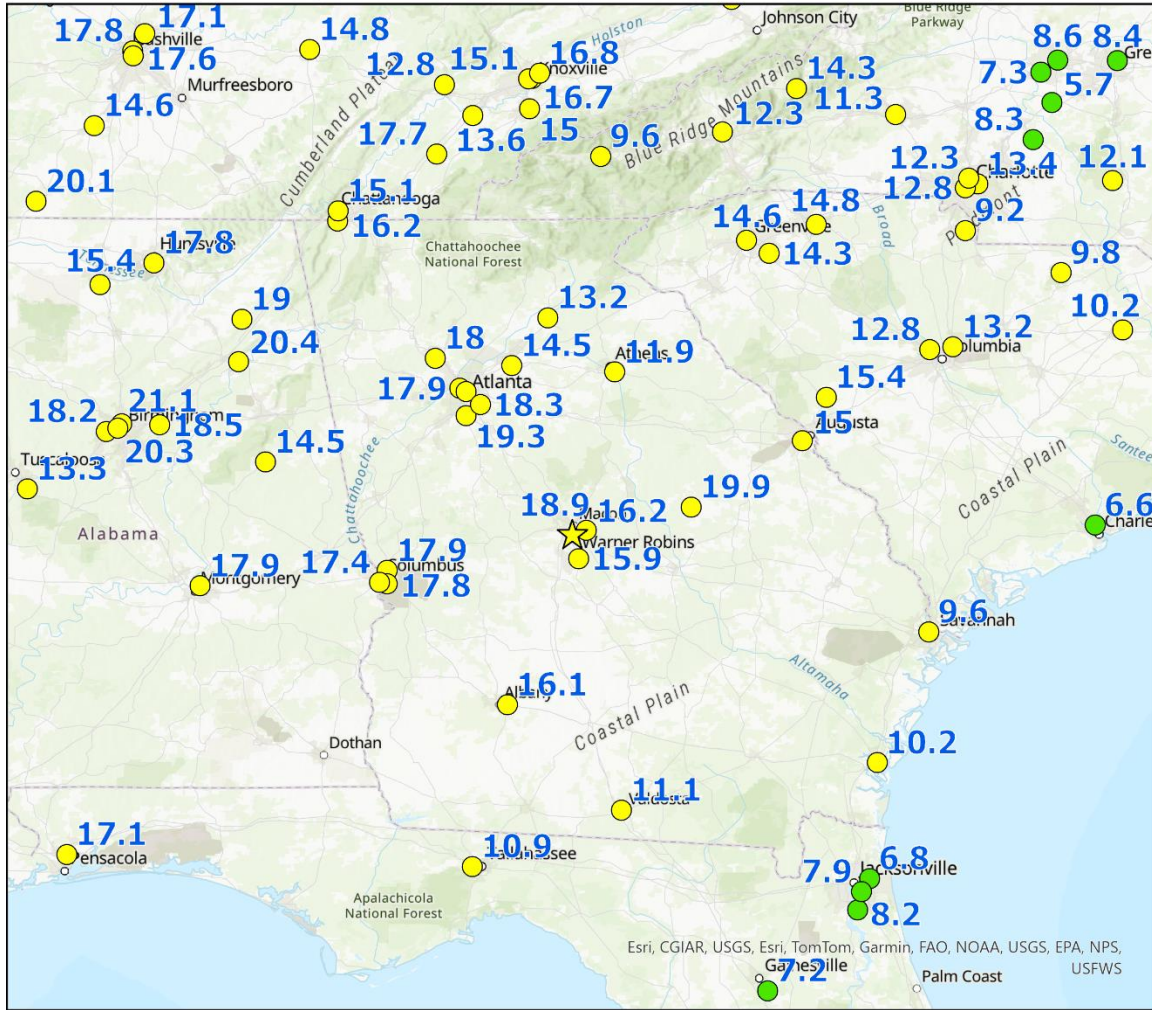


## AQI category - 24-hr average PM<sub>2.5</sub>

- Good (0-9 ug/m<sup>3</sup>)
- Moderate (9.1-35.4 ug/m<sup>3</sup>)
- Unhealthy for sensitive (35.5-55.4 ug/m<sup>3</sup>)
- Unhealthy (55.5-150.4 ug/m<sup>3</sup>)
- Very unhealthy (150.4-250.4 ug/m<sup>3</sup>)
- Hazardous (>250.4 ug/m<sup>3</sup>)

**Figure D4.** Surface level, daily PM<sub>2.5</sub> concentrations on July 26, 2023, across the southeast. The Macon-Allied monitoring site is represented by a star. Numerous sites measured concentrations that exceeded the level of annual PM<sub>2.5</sub> NAAQS.

# August 25, 2023 PM<sub>2.5</sub> Exceedance Report

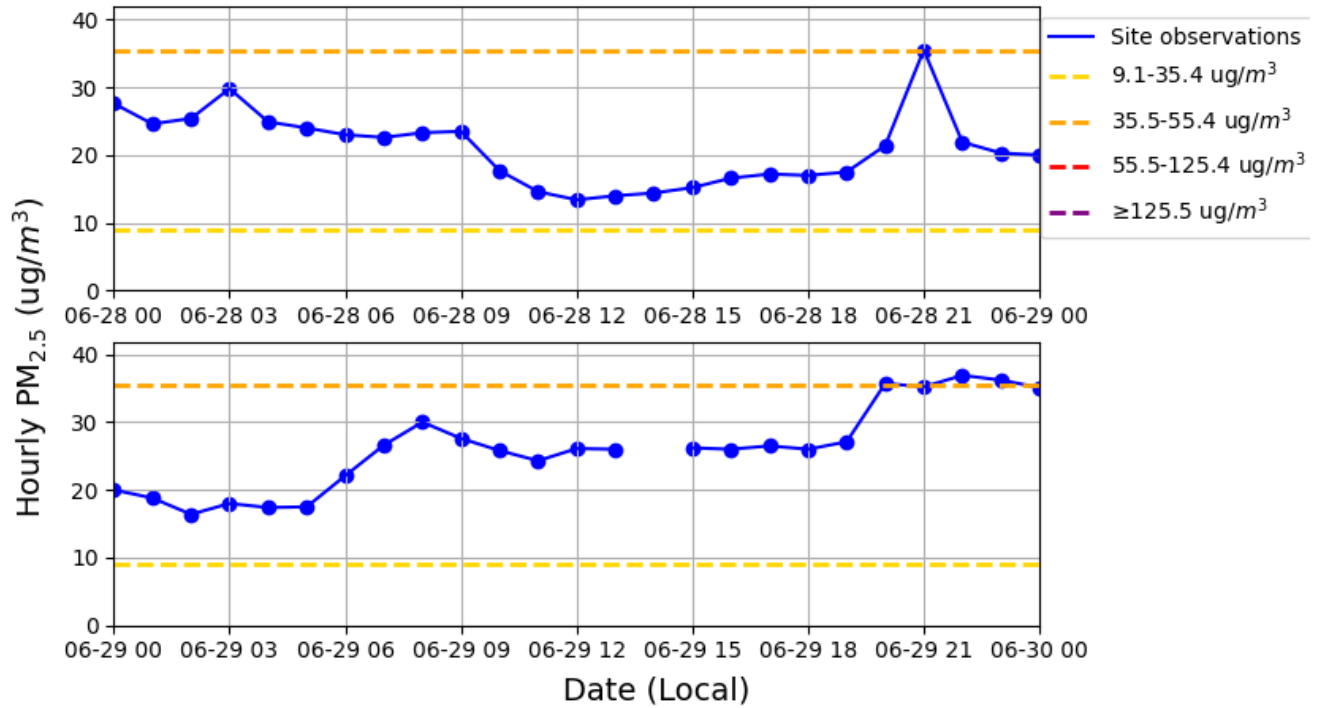


## AQI category - 24-hr average PM<sub>2.5</sub>

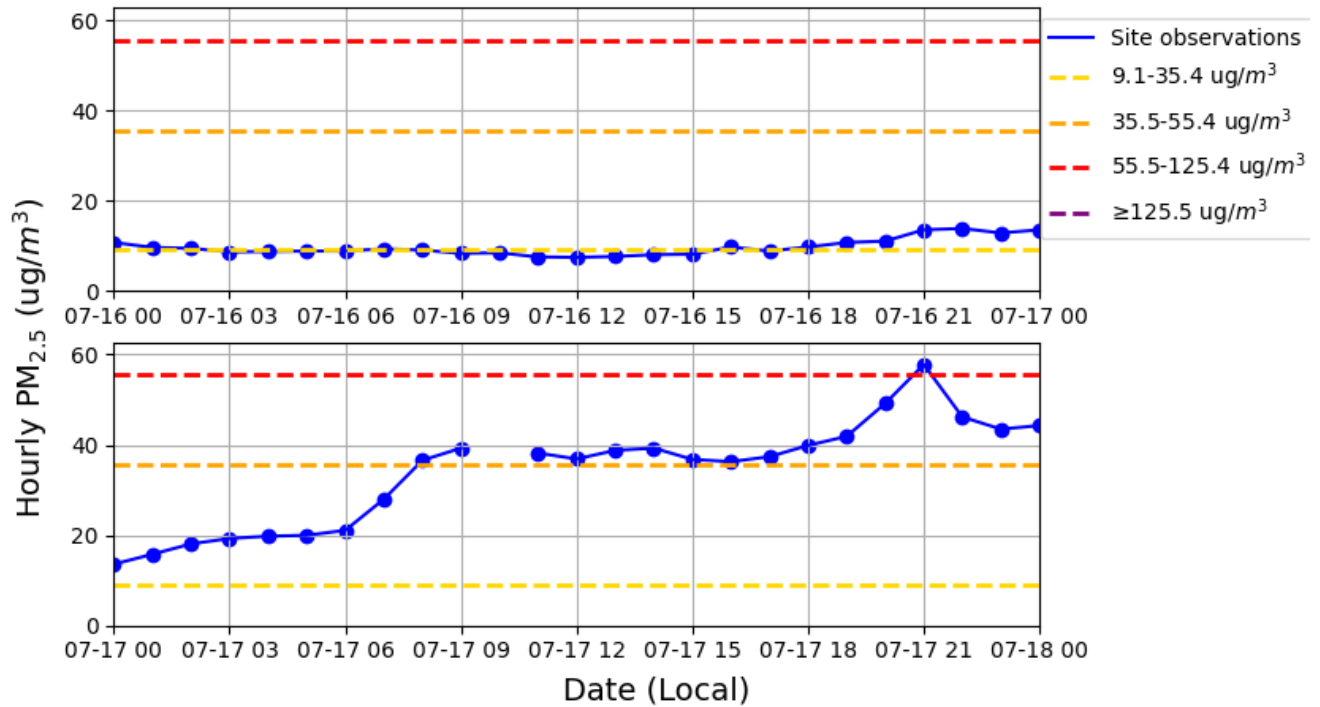
- Good (0-9 ug/m<sup>3</sup>)
- Moderate (9.1-35.4 ug/m<sup>3</sup>)
- Unhealthy for sensitive (35.5-55.4 ug/m<sup>3</sup>)
- Unhealthy (55.5-150.4 ug/m<sup>3</sup>)
- Very unhealthy (150.4-250.4 ug/m<sup>3</sup>)
- Hazardous (>250.4 ug/m<sup>3</sup>)

**Figure D5.** Surface level, daily PM<sub>2.5</sub> concentrations on August 25, 2023, across the southeast. The Macon-Allied monitoring site is represented by a star. Numerous sites measured concentrations that exceeded the level of annual PM<sub>2.5</sub> NAAQS.

### Appendix E: Hourly PM<sub>2.5</sub> Time Series

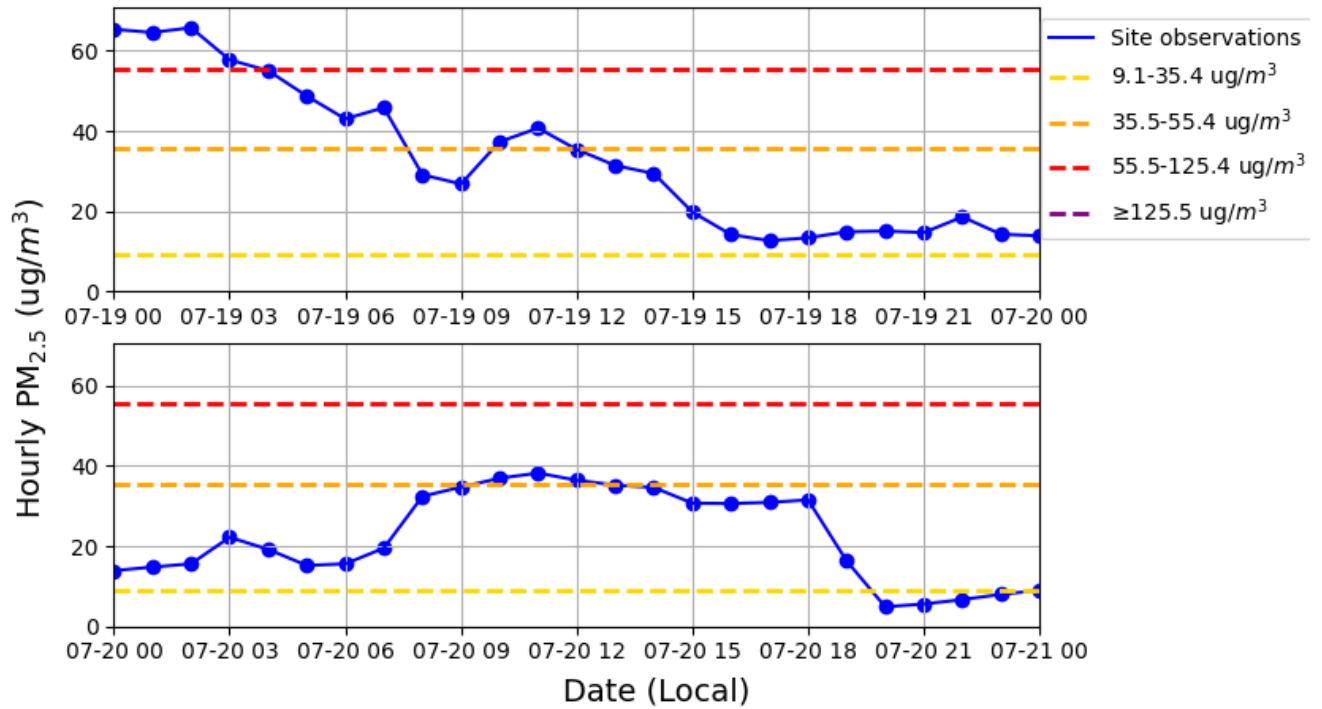


**Figure E1.** Hourly PM<sub>2.5</sub> concentrations at the Macon-Allied site on June 28 and 29, 2023. The solid blue lines with dots show observations. The dashed lines show AQI breakpoints.

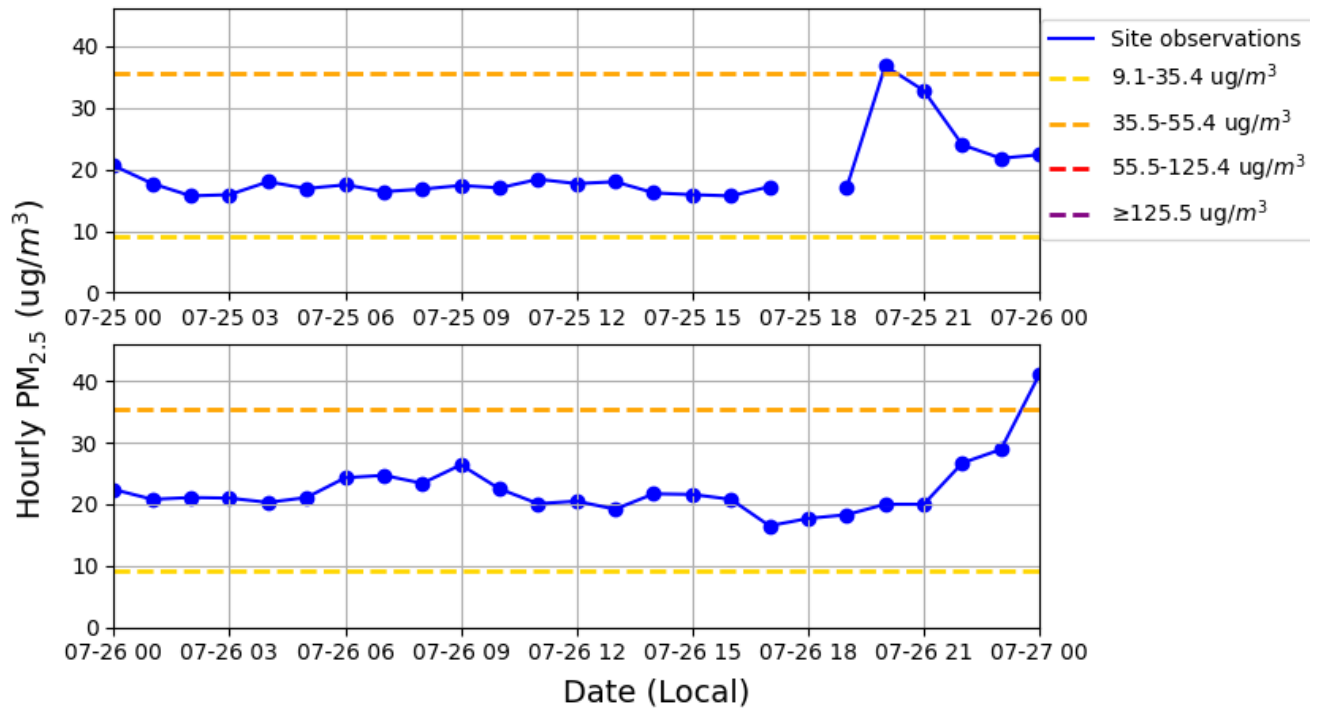


**Figure E2.** Hourly PM<sub>2.5</sub> concentrations at the Macon-Allied site on July 17 and 18, 2023. The solid blue lines with dots show observations. The dashed lines show AQI breakpoints.

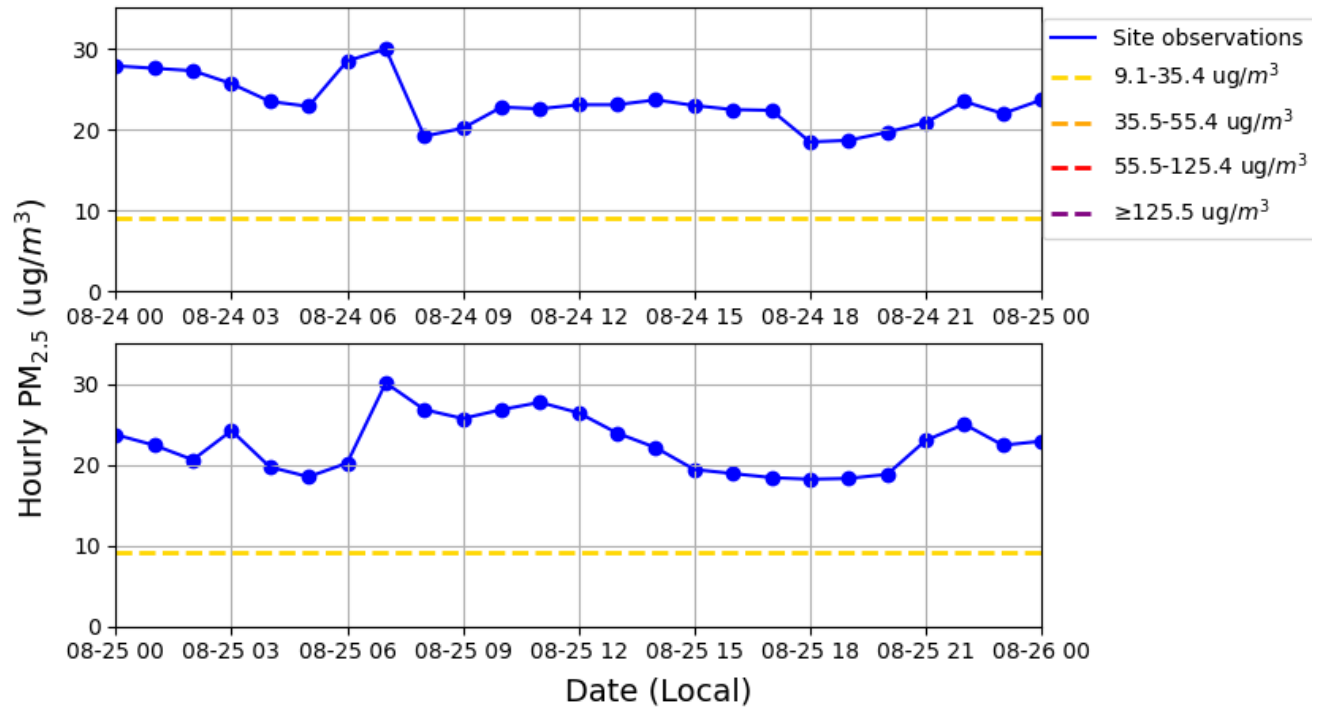




**Figure E3.** Hourly PM<sub>2.5</sub> concentrations at the Macon-Allied site on July 19 and 20, 2023. The solid blue lines with dots show observations. The dashed lines show AQI breakpoints.

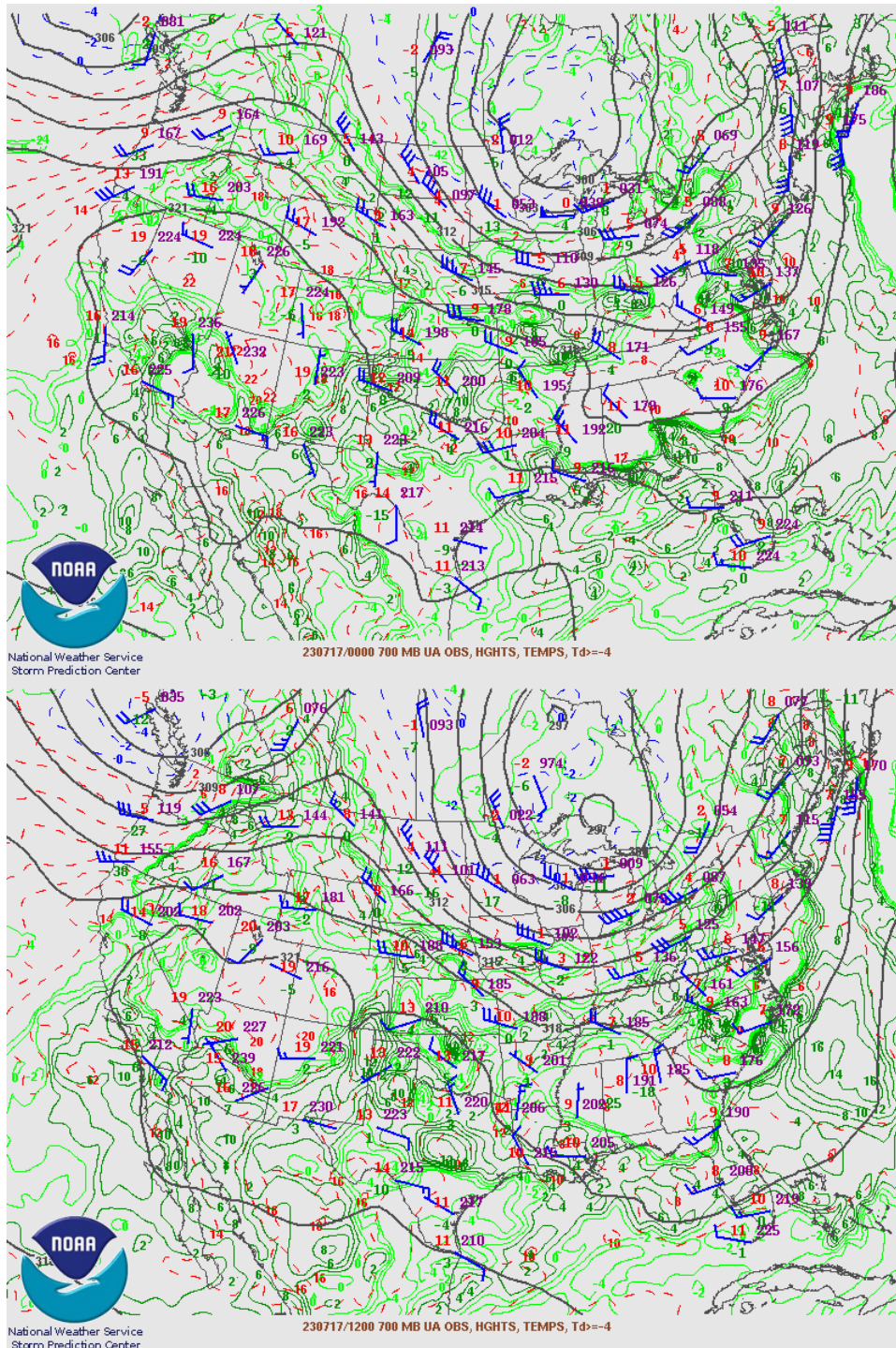


**Figure E4.** PM<sub>2.5</sub> concentrations at the Macon-Allied site on July 25 and 26, 2023. The solid, dotted line shows monitor observations, and the dashed lines show AQI tiers adjusted for the 2024 PM<sub>2.5</sub> NAAQS.

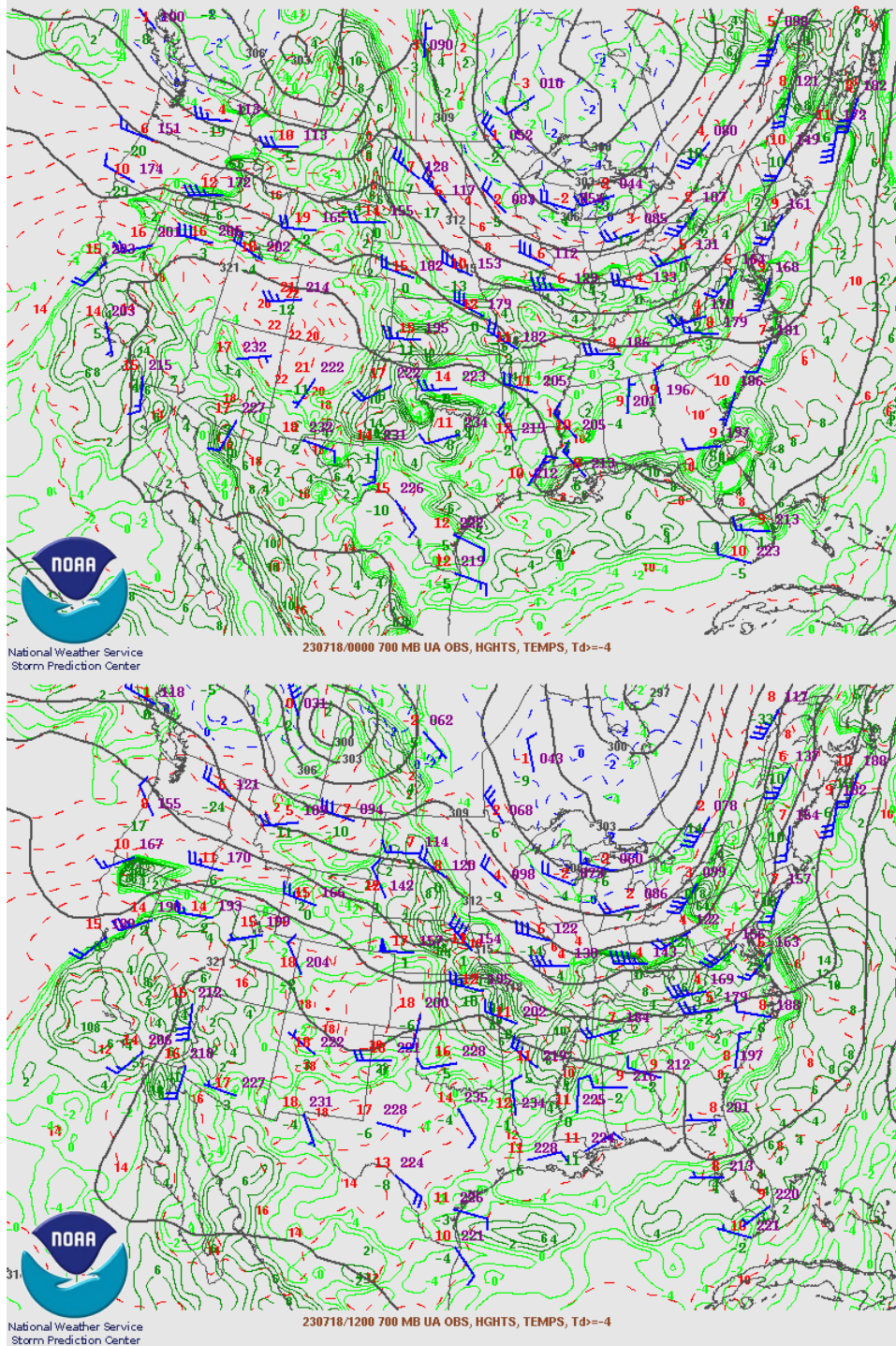


**Figure E5.** Hourly PM<sub>2.5</sub> concentrations at the Macon-Allied site on August 24 and 25, 2023. The solid blue lines with dots show observations. The dashed lines show AQI breakpoints.

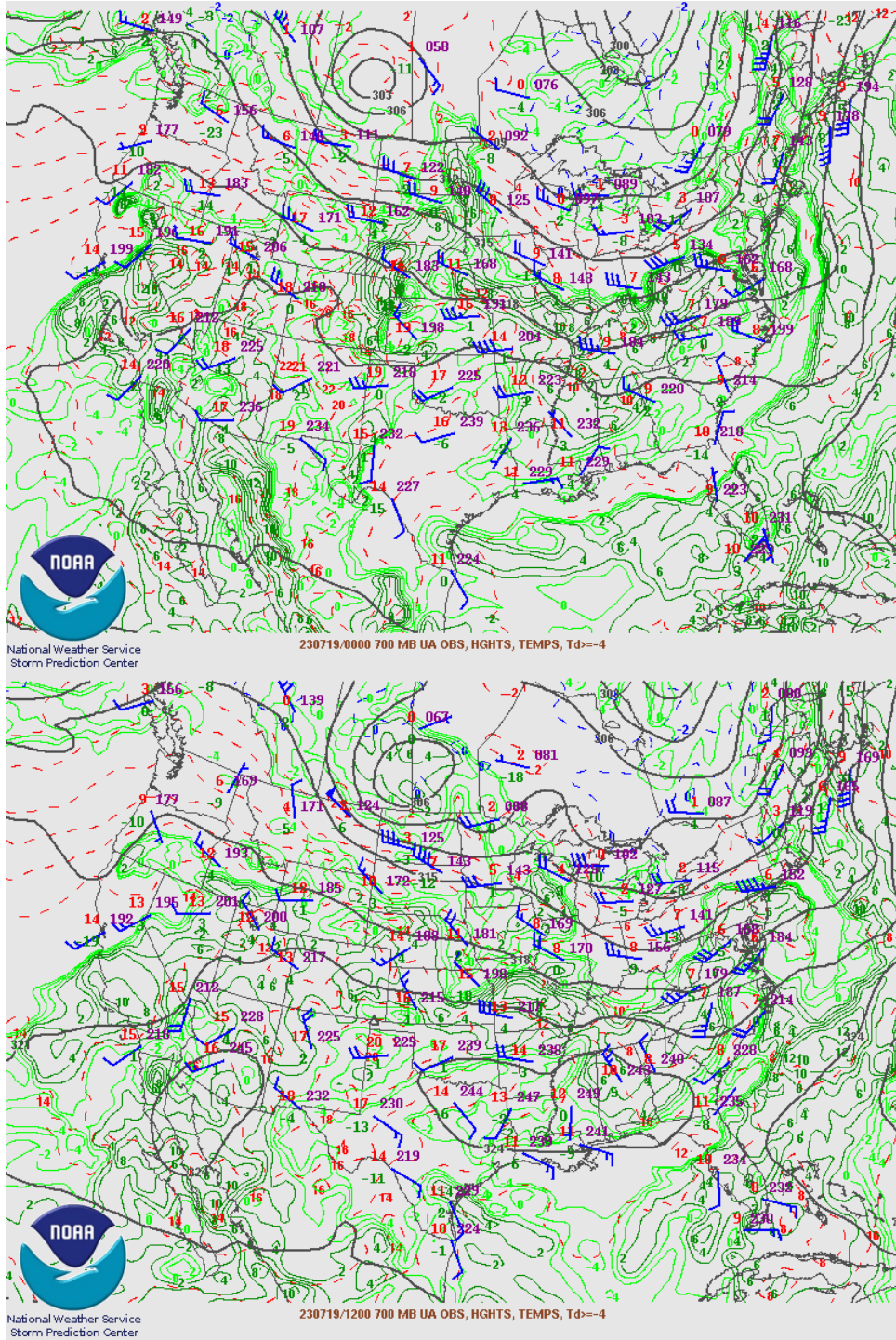
## Appendix F: Upper Air Maps



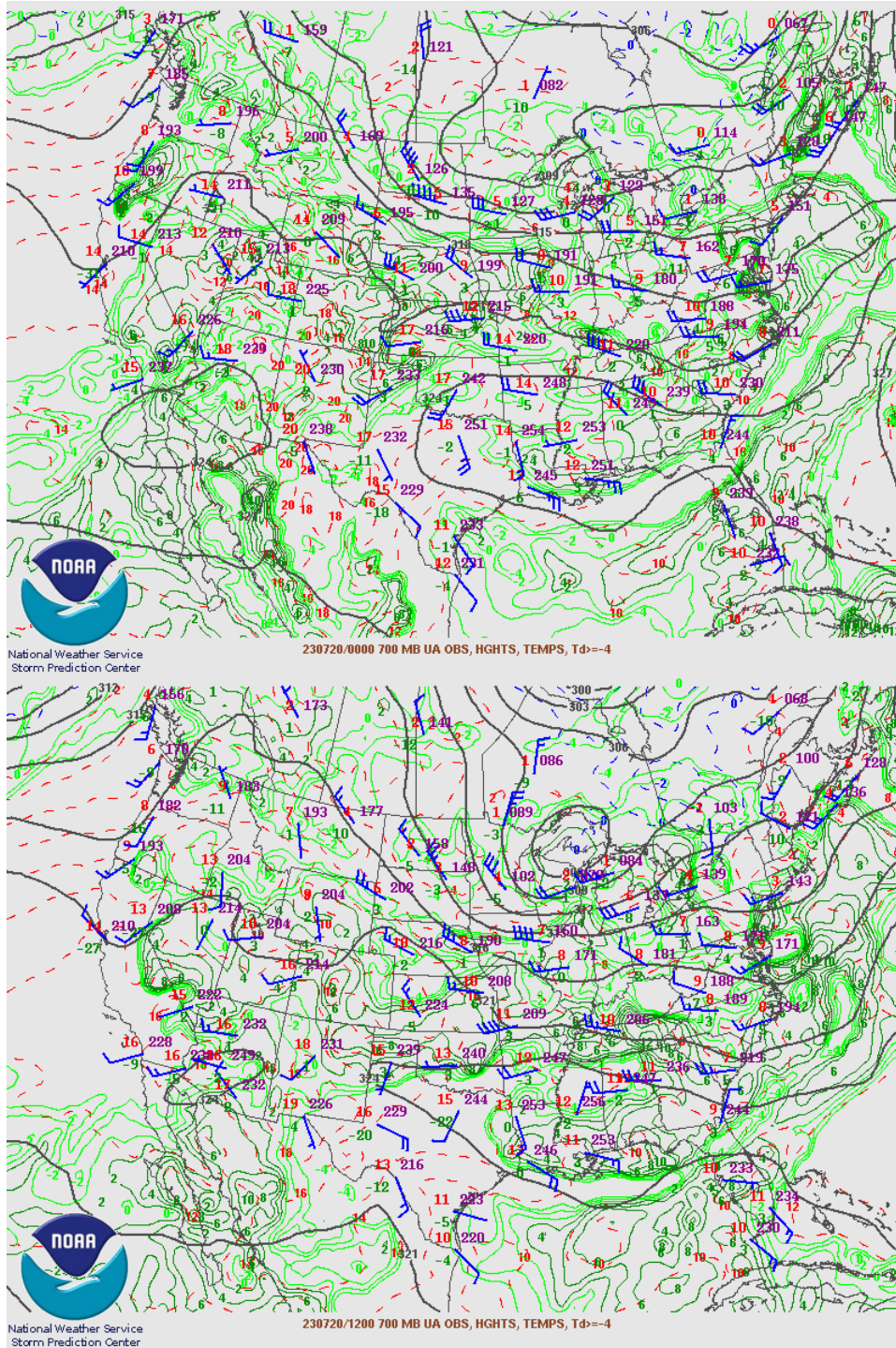
**Figure F1.** Storm Prediction Center upper air maps for July 17, 2023, at 00 UTC (top) and at 12 UTC (bottom). Maps are generated at a pressure of 700 mb (altitude of 2350-3150 MSL). Wind barbs ( $^{\circ}$  from north, knots) are plotted in blue, isotherms ( $^{\circ}$ C) in red, isodrosotherms ( $^{\circ}$ C) in green contours, and isoheights (m MSL) in dark grey.



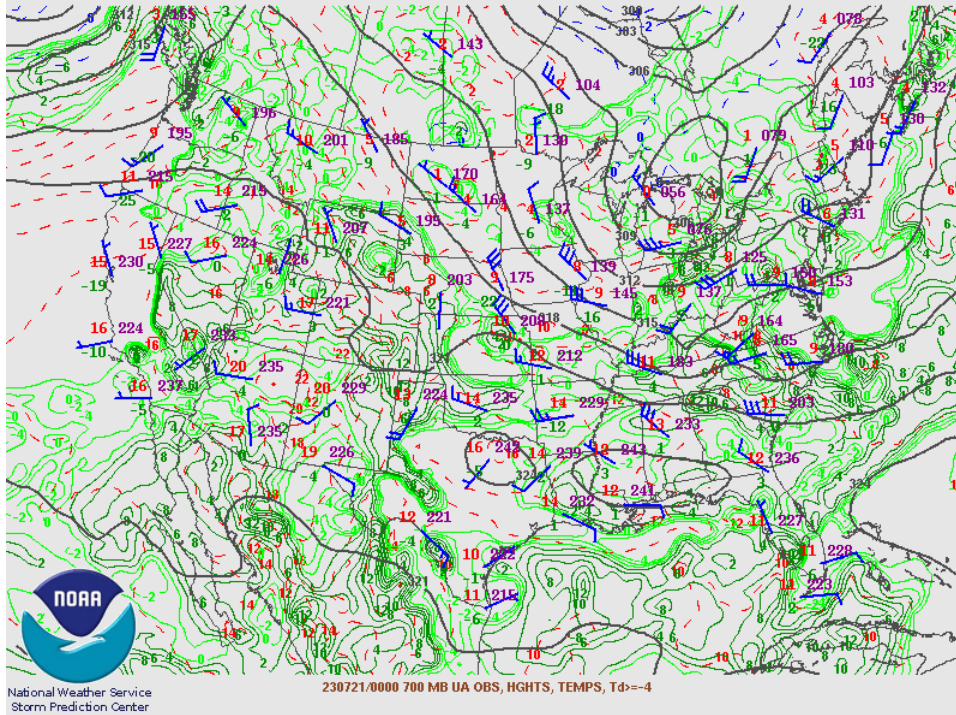
**Figure F2.** Storm Prediction Center upper air maps for July 18, 2023, at 00 UTC (top) and at 12 UTC (bottom). Maps are generated at a pressure of 700 mb (altitude of 2350-3150 MSL). Wind barbs ( $^{\circ}$  from north, knots) are plotted in blue, isotherms ( $^{\circ}\text{C}$ ) in red, isodrosotherms ( $^{\circ}\text{C}$ ) in green contours, and isoheights (m MSL) in dark grey.



**Figure F3.** 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 700 mb (altitude of 2350-3150 MSL). Wind barbs ( $^{\circ}$  from north, knots) are plotted in blue, isotherms ( $^{\circ}$ C) in red, isodrosotherms ( $^{\circ}$ C) in green contours, and isoheights (m MSL) in dark grey.



**Figure F4.** Storm Prediction Center upper air maps for July 20, 2023, at 00 UTC (top) and at 12 UTC (bottom). Maps are generated at a pressure of 700 mb (altitude of 2350-3150 MSL). Wind barbs ( $^{\circ}$  from north, knots) are plotted in blue, isotherms ( $^{\circ}$ C) in red, isodrosotherms ( $^{\circ}$ C) in green contours, and isoheights (m MSL) in dark grey.



**Figure F5.** Storm Prediction Center upper air maps for July 21, 2023, at 00 UTC. Map is generated at a pressure of 700 mb (altitude of 2350-3150 MSL). Wind barbs ( $^{\circ}$  from north, knots) are plotted in blue, isotherms ( $^{\circ}$ C) in red, isodrosotherms ( $^{\circ}$ C) in green contours, and isoheights (m MSL) in dark grey.

**Appendix G: Public Comments**

**Appendix H: Responses to Public Comments**