

USFS PROJECTS AND GENERAL CONFORMITY

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GENERAL CONFORMITY

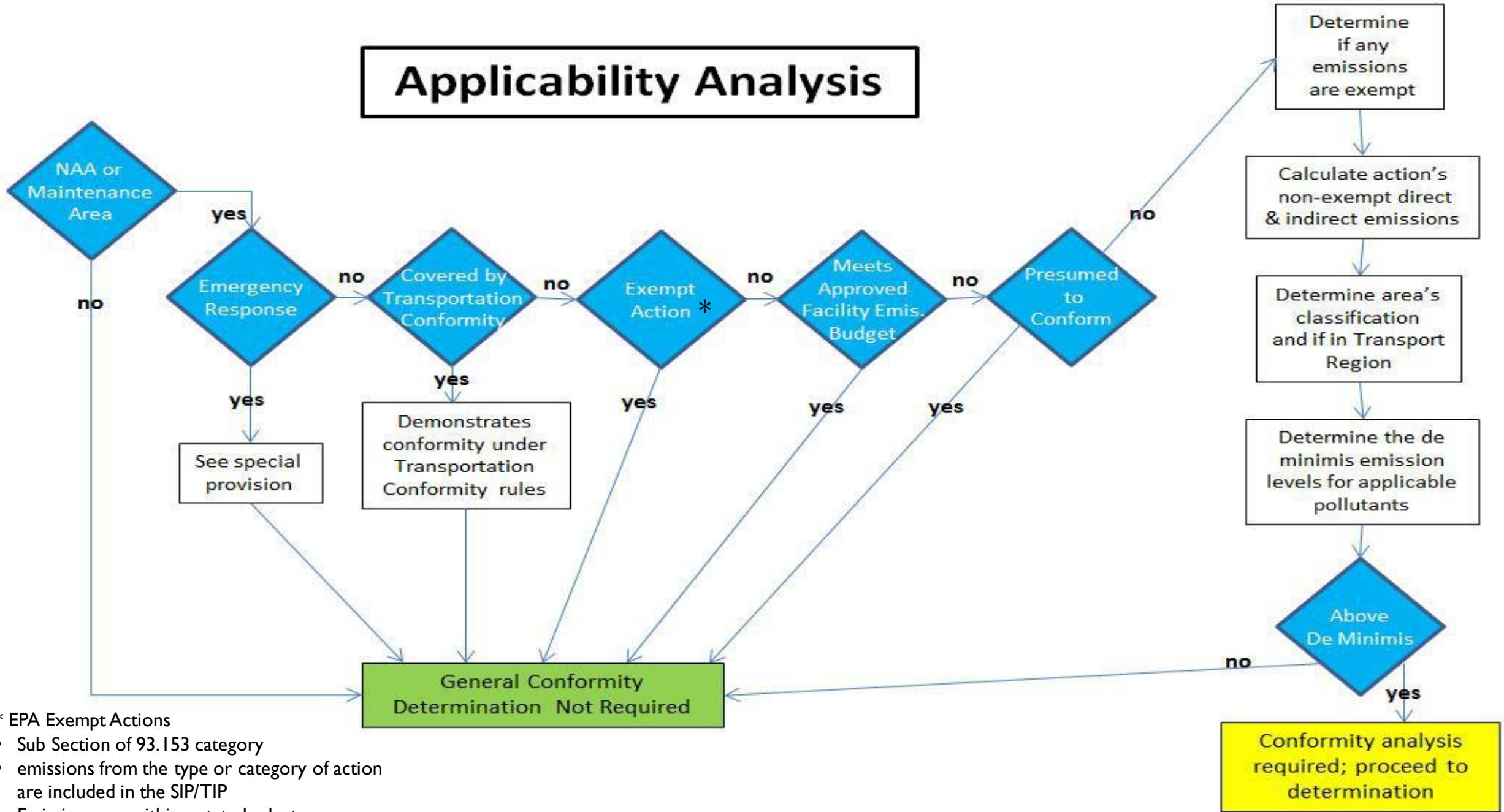
- General Conformity ensures that the actions taken by federal agencies do not interfere with a state's plans to attain and maintain national standards for air quality.
 - federal activities do not cause or contribute to new violations of National Ambient Air Quality Standards (NAAQS);
 - actions do not worsen existing violations of the NAAQS; and
 - attainment of the NAAQS is not delayed.
- Under the General Conformity rule, federal agencies must work with state, tribal and local governments in a nonattainment or maintenance area to ensure that federal actions conform to the air quality plans established in the applicable state or tribal implementation plan.

USFS PROJECT TYPES

- Rx Fire (broadcast and piles) | relevant NAAQs = pm, ozone
- Thinning, Timber | relevant NAAQs = pm, ozone
- Oil and Gas (with BLM) | relevant NAAQs = pm, ozone
- Coal (with BLM) | relevant NAAQs = pm, ozone
- Hard Rock Minerals (with BLM) | relevant NAAQs = pm
- Grazing | relevant NAAQs = pm? / none?
- Roads, Trails, Bridges, Facilities | relevant NAAQs = pm, ozone



Applicability Analysis



* EPA Exempt Actions

- Sub Section of 93.153 category
- emissions from the type or category of action are included in the SIP/TIP
- Emissions are within a state budget

De Minimis Tables

40 CFR 93.153(b)(1) - For purposes of paragraph (b) of this section the following rates apply in nonattainment areas (NAA's):	
	Tons/year
Ozone (VOC's or NOx):	
Serious NAA's	50
Severe NAA's	25
Extreme NAAs	10
Other ozone NAA's outside an ozone transport region:	100
Other ozone NAA's inside an ozone transport region:	
VOC	50
NOx	100
Carbon Monoxide: All maintenance areas	100
SO ₂ or NO ₂ : All NAA's	100
PM ₁₀ :	
Moderate NAA's	100
Serious NAA's	70
PM _{2.5} (direct emissions, SO ₂ , NOx, VOC, and Ammonia):	
Moderate NAA's	100
Serious NAA's	70
Pb: All NAA's	25

De Minimis Tables

40 CFR 93.153(b)(2) - For purposes of paragraph (b) of this section the following rates apply in maintenance areas:

	Tons/year
Ozone (NO _x), SO ₂ or NO ₂ :	
All maintenance areas	100
Ozone (VOC's)	
Maintenance areas inside an ozone transport region	50
Maintenance areas outside an ozone transport region	100
Carbon monoxide: All maintenance areas	100
PM ₁₀ : All maintenance areas	100
PM _{2.5} (direct emissions, SO ₂ , NO _x , VOC, and Ammonia)	100
All maintenance areas	100
Pb: All maintenance areas	25

NEPA

- If a conformity analysis or a demonstration of de-minimis emissions is required, USFS will incorporate this analysis into the air quality section of the NEPA document.
- EPA General Conformity Training Manual at 1.3.4.2
 - If convenient, a conformity determination may be integrated with the NEPA process. However, this is not required and the two may be separated. The federal agency determines the most appropriate way, given the individual situation, to integrate the conformity and NEPA processes.

PRESCRIBED FIRE & GENERAL CONFORMITY

- 2010 General Conformity Rule Amendments provides two special exemptions from conformity for prescribed fires conducted by a federal agency
 1. Fires conducted in accordance with a State Smoke Management Program that meets the requirements of the Interim Policy (EPA 1998) (or an equivalent EPA policy) are “presumed to conform” (40 CFR 93.153(i)(2)).
 2. In the absence of an SMP, the application of Basic Smoke Management Practices (BSMPs) as long as public notice and comment is conducted before the action is taken to add to the list of presumed to conform actions. Federal agencies will also have to meet all the requirements of 40 CFR 93.153(g).