WASHOE COUNTY HEALTH DISTRICT ENHANCING QUALITY OF LIFE

Exceptional Event Demonstration for August 6-7, 2021 PM₁₀ Exceedance due to Dixie/Antelope Fire

Submitted to U.S. EPA Region 9 on Date







VISION

A healthy community

MISSION

To improve and protect our community's quality of life and increase equitable opportunities for better health.

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Acronyms and Abbreviations

AGL Above Ground Level AQI Air Quality Index

AQMD Washoe County Health District - Air Quality Management Division

AQS Air Quality System
CAA Clean Air Act

CFR Code of Federal Regulations

CO Carbon Monoxide
EE Exceptional Event
EER Exceptional Events Rule

EPA U.S. Environmental Protection Agency

°F Degrees Fahrenheit

FCCS Fuel Characteristic Classification System

HA 87 Hydrographic Area 87
HMS Hazardous Mapping System

HYSPLIT Hybrid Single-Particle Lagrangian Integrated Trajectory

Lbs Pounds

µg/m³ Micrograms per cubic meter

MPH Miles Per Hour

NAAQS National Ambient Air Quality Standards

NAM North American Mesoscale

NSPS New Source Performance Standards

NOAA National Oceanic and Atmospheric Administration

NO Nitric Oxide NO₂ Nitrogen Dioxide NOx Nitrogen Oxides

NOy Reactive Nitrogen Compounds NWS National Weather Service

O₃ Ozone

PG&E Pacific Gas and Electric
PM Particulate Matter

PM_{2.5} Particulate Matter less than or equal to 2.5 microns in aerodynamic diameter PM₁₀ Particulate Matter less than or equal to 10 microns in aerodynamic diameter

ppm Parts Per Million PST Pacific Standard Time

R² Coefficient of Determination

SO₂ Sulfur Dioxide

TSP Total Suspended Particles

1.0 Introduction

1.1 Purpose

The analysis in this report demonstrates that the exceedances of the primary and secondary 24-hour PM₁₀ National Ambient Air Quality Standard (NAAQS) recorded on August 6, 2021, at the Toll air monitoring site and on August 7, 2021, at the Sparks and Reno4 air monitoring sites were caused by the Dixie and Antelope wildfires. Pursuant to the Exceptional Event (EE) requirements under the Clean Air Act (CAA), the data may be excluded from regulatory decisions for PM₁₀ NAAQS. Washoe County Health District Air Quality Management Division (AQMD) is requesting to exclude all PM₁₀ data from the Toll (AQS ID: 32-031-0025-81102-2) PM₁₀ monitor on August 6, 2021, and all PM₁₀ data from the Reno4 (AQS ID: 32-031-0031-81102-2) and Sparks (AQS ID: 32-031-1005-81102-4) PM₁₀ primary monitors on August 7, 2021. Exclusion of the data caused by this exceptional event will have a regulatory impact on the approval of the 2nd 10-Year Maintenance Plan for PM₁₀.

1.2 Exceptional Events Rule Procedure

On October 3, 2016, the Environmental Protection Agency (EPA) finalized revisions to the "Treatment of Data Influenced by Exceptional Events", regulations that govern the exclusion of event-influenced air quality data from certain regulatory decisions under the CAA Section 319(b). This rule is known as the Exceptional Events Rule (EER). The EER contains definitions, procedural requirements, requirements for air agency demonstrations, and criteria for EPA approval for the exclusion of air quality data from regulatory decisions. The EER states that the EPA has the authority to exclude air quality monitoring data from regulatory determinations related to exceedances or violations of the NAAQS and avoid designating an area as nonattainment, redesignating an area as nonattainment, or reclassifying an existing nonattainment area to a higher classification if a State adequately demonstrates that an exceptional event has caused an exceedance or violation of a NAAQS. The CAA includes four requirements that, collectively, define an exceptional event:

- 1. The event affected air quality,
- 2. The event was not reasonably controllable or preventable,
- 3. The event was caused by human activity that is unlikely to recur at a particular location or was a natural event,
- 4. There exists a clear causal relationship between the specific event and the monitored exceedance.

EPA regulations in the Code of Federal Regulations (CFR) - 40 CFR 50.14(c)(3)(iv) states that exceptional events demonstrations must address and include the following elements:

- 1. A narrative conceptual model; (See **Section 2** of this document)
- 2. A demonstration that the event affected air quality in such a way that there exists a clear causal relationship between the specific event and the monitored exceedance; (See **Section 4** of this document)
- 3. Analyses comparing the claimed event influenced concentrations at the monitoring site; (See **Section 4** of this document)
- 4. A demonstration that the event was both not reasonably controllable and not reasonably preventable; (See **Section 3** of this document)

5. A demonstration that the event was a human activity unlikely to recur at a particular location or was a natural event. (See **Section 5** of this document)

1.3 Public Comment Process

This demonstration was available for public comment from October 26 to November 26, 2023 at the AQMD website (OurCleanAir.com). A hardcopy of the plan was also available at the AQMD office. See Appendix A for AQMD's Public Comment Plan.

1.4 Agency Contacts

For information or questions regarding this Exceptional Events Demonstration, please contact the following individuals of the AQMD.

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2.0 Conceptual Model

2.1 Regional Description

Washoe County is located in the northwest portion of Nevada. It is bounded by California, Oregon, and the Nevada counties of Humboldt, Pershing, Storey, Churchill, Lyon, and Carson City (Figure 2-1). The Truckee Meadows is approximately 200 square miles in size and situated in the southern portion of Washoe County. It is geographically identified as Hydrographic Area 87 (HA 87) as defined by the State of Nevada, Division of Water Resources. Most of Washoe County's population lives in and around the Truckee Meadows.

The Truckee Meadows sits at an elevation of 4,400 feet above sea level and is surrounded by mountain ranges. To the west, the Sierra Nevada rises to elevations of 9,000 to 11,000 feet. Hills to the east reach 6,000 to 8,000 feet. The Truckee River, flowing from the Sierra Nevada eastward, drains into Pyramid Lake to the northeast of the Truckee Meadows.

Climate

Average annual wind speed measured at the Reno-Tahoe International Airport is 6.4 miles per hour (mph). January is the calmest month (4.5 mph) with April being the windiest (8.3 mph). Wintertime (November-January) averages 4.9 mph and summertime (June-August) averages 7.2 mph.

Most of Reno's precipitation falls from November through
March in the form of rain and snow. Reno receives an average
of 7.35 inches of precipitation per calendar year (1991-2020 climate normals). Table 2-1 lists
temperature and precipitation normals as measured at the Reno-Tahoe International Airport.

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Figure 2-1 Washoe County, Nevada



Table 2-1: Monthly Normal Temperature and Rainfall (1991-2020)

	T	Precipitation (inches)		
Month	Maximum	Minimum	Mean	Mean
January	47.7	26.1	36.9	1.25
February	52.1	29.0	40.6	1.03
March	59.2	34.0	46.6	0.80
April	64.7	38.5	51.6	0.44
May	74.1	46.6	60.3	0.55
June	84.6	53.8	69.2	0.41
July	93.9	60.4	77.2	0.20
August	92.1	58.1	75.1	0.24
September	83.8	50.3	67.0	0.21
October	70.4	39.7	55.1	0.50
November	56.7	31.0	43.8	0.62
December	46.7	25.7	36.2	1.1

Maximum temperatures of 90 °F or above normally occur between July 3 and August 21. Maximum temperatures typically peak at 94 °F between July 22 and July 29.

Demographics

The 2020 population of Washoe County was 486,492. Approximately two-thirds of Washoe County's residents live in the Truckee Meadows, which includes the cities of Reno and Sparks. Anthropogenic activities such as transportation, manufacturing, freight distribution, and residential wood use are also concentrated in the Truckee Meadows.

Seasons

Washoe County experiences two distinct air pollution seasons - wintertime particulate matter (PM) and summertime ozone (O_3). Wildfire smoke throughout the year, especially during the summer months, can dramatically increase summertime PM and O_3 .

Wintertime temperature inversions combined with light winds can contribute to elevated levels of Particulate Matter less than or equal to 2.5 microns in aerodynamic diameter ($PM_{2.5}$), Particulate Matter less than or equal to 10 microns in aerodynamic diameter (PM_{10}), Nitrogen Dioxide (NO_2), and Carbon Monoxide (CO). Inversions are common in mountain valleys such as the Truckee Meadows. Air pollution episodes persist until stronger winds scour the cold air out of the valley and break the temperature inversion.

Northern Nevada receives an abundant amount of sunshine and solar radiation during the summer months. Mobile sources (i.e., cars and trucks) emit O₃ precursors and their activity increases during the summer. Ozone concentrations are typically highest between May and September, especially during the months of June, July, and August.

Strong winds can occur at any time of year. Two-minute gusts over 40 mph are not uncommon. These winds lower the gaseous pollutant (O_3 , CO, NO_2 , and SO_2) concentrations but typically increase PM levels, especially PM_{10} . Hourly PM_{10} levels can reach more than 500 micrograms per cubic meter ($\mu g/m^3$) for several hours.

Attainment Status

All areas of Washoe County currently attain or are unclassifiable for all National Ambient Air Quality Standards (NAAQS). However, portions of Washoe County had previously been designated non-attainment for the following NAAQS: 1) 1971 Total Suspended Particles (TSP) (24-hour and Annual); 2) CO (8-hour); 3) 1979 O_3 (1-hour); and 4) 1987 PM_{10} (24-hour and Annual). Some pollutants and standards, such as 1-hour O_3 and TSP, have been revoked and no longer apply. For the other pollutants, CO and PM_{10} , the HA 87 planning area was redesignated to maintenance after the standard was met. Since the 1970's, AQMD has implemented control strategies to target mobile sources, wood-burning devices, and dust control to achieve attainment with the NAAQS.

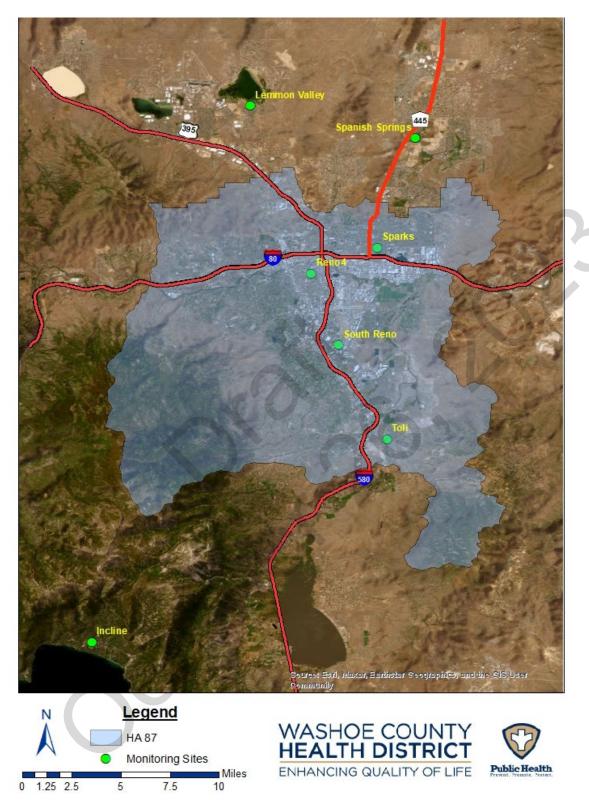
2.2 Overview of Monitoring Network

In 2021, the Washoe County Health District, Air Quality Management Division (AQMD) operated seven ambient air monitoring sites in Washoe County (Figure 2-2). The blue boundary delineates HA 87 as defined by the State of Nevada, Division of Water Resources. Table 2-2 lists the parameters monitored in 2021, sorted by site.

Table 2-2: List of Monitoring Sites and Pollutants Monitored in 2021

Site	0³	00	Trace CO	Trace NO	NO ₂	NO _x	Trace NOy	Trace SO ₂	PM ₁₀	PM _{2.5}	PM _{coarse}	PM _{2.5} Speciation	Meteorology
Incline	✓												
Lemmon Valley	✓												
Reno4	V		\checkmark	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
South Reno	✓												✓
Sparks	V	V							✓	✓	✓		✓
Spanish Springs	✓								✓	✓	✓		
Toll	V								✓	✓	✓		✓

Figure 2-2: Washoe County Health District - AQMD Ambient Air Monitoring Sites



The AQMD's ambient air monitoring network meets the minimum monitoring requirements for all criteria pollutants pursuant to Title 40, Part 58 of the Code of Federal Regulations (CFR), Appendix D. Washoe County's monitoring network is reviewed annually pursuant to 40 CFR 58.10 to ensure the network meets the monitoring objectives defined in 40 CFR 58, Appendix D. Data was collected and quality assured in accordance with 40 CFR 58 and submitted to the Air Quality System (AQS). Additionally, 2021 data was certified on April 26, 2022. (See Appendix C).

2.3 Characteristics of Non-event PM₁₀ Concentrations

Without exceptional events, ambient PM_{10} concentrations within Washoe County are under the limit of the PM_{10} NAAQS standard. This is because the PM_{10} emissions that Washoe County produces have been regulated through different policy instruments such as a dust control program, New Source Performance Standards (NSPS) for woodburning devices, and street sanding/sweeping regulations. Figure 2-3 shows that Washoe County produces 38,833 lbs/day of PM_{10} emissions as per the 2020 Periodic Emissions Inventory. This includes emissions from wildfires within the Washoe County limits. Emissions from purely anthropogenic sources make up about 31,786 lbs/day.

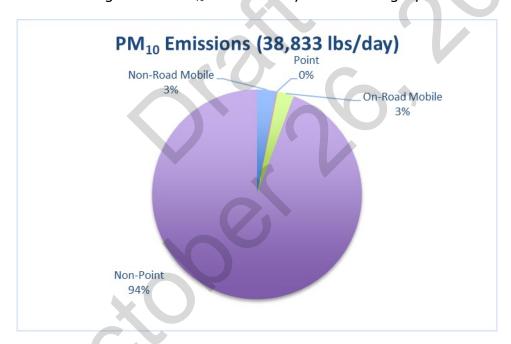


Figure 2-3: PM₁₀ Emissions by Source Category

Based on historic, non-event PM_{10} monitoring data for the previous six years, below are the characteristics of PM_{10} levels throughout the year in the Truckee Meadows.

1. October through March: Ambient PM₁₀ concentrations are relatively high during the colder months because some Washoe County residents utilize wood-burning devices for heat. Additionally, PM₁₀ concentrations can increase after snowstorms due to local street sanding and sweeping. The Truckee Meadows region also struggles with inversion layers in which cold air gets trapped at ground level, causing poor atmospheric mixing. This inhibits PM emissions from leaving the air basin and can

- cause higher concentrations of PM_{10} . Despite this, the region rarely experiences 24-hour PM_{10} averages over 100 $\mu g/m^3$ during these times.
- 2. April through June: Ambient PM_{10} concentrations during this period are usually the lowest of the year. With higher temperatures, there is less residential wood-burning. Additionally, soil generally hasn't been dried by high temperatures such as what could be seen at the end of summertime. Wind speeds are higher in the spring which helps with air mixing and vacating any PM_{10} buildup from the region.
- 3. July through September: Ambient PM₁₀ concentrations are the highest during this time period. This coincides with the wildfire season in the western United States. Although wildfire season is sometimes described as June-August, changes in climate in the western United States has caused wildfire smoke impacts to be more commonly felt in September rather than June. The Washoe County area has been impacted by wildfire events during these months for nine out of the last ten years. The main source of anthropogenic PM₁₀ emissions during this time comes from fugitive dust that has been dried after months of high temperatures.

The wildfire events that have caused exceedances have occurred in the July through September period. For the purpose of this demonstration, it is worthwhile to evaluate the diurnal pattern of PM_{10} concentrations during this time period. Figure 2-4 through Figure 2-6 below shows the 2016-2020 PM_{10} diurnal pattern for non-event days at the Toll, Reno4, and Sparks monitors with the 5th, 50th, and 95th percentile included. Throughout the day, PM_{10} concentrations generally rise and peak between the hours of 5:00 PST and 11:00 PST.

Figure 2-4: 2016-2020 Wildfire Season PM₁₀ Diurnal Pattern at Toll

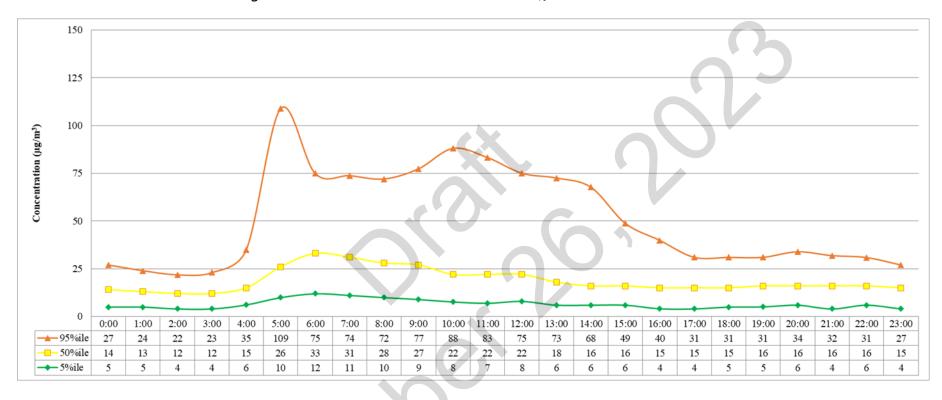


Figure 2-5: 2016-2020 Wildfire Season PM₁₀ Diurnal Pattern at Reno4

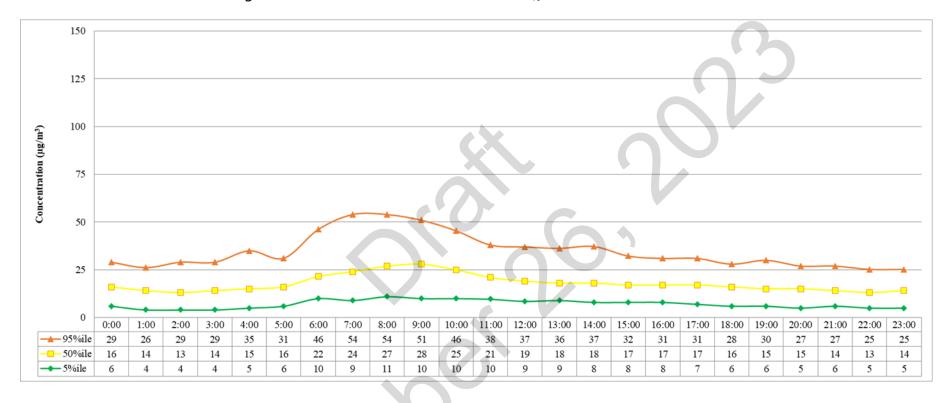
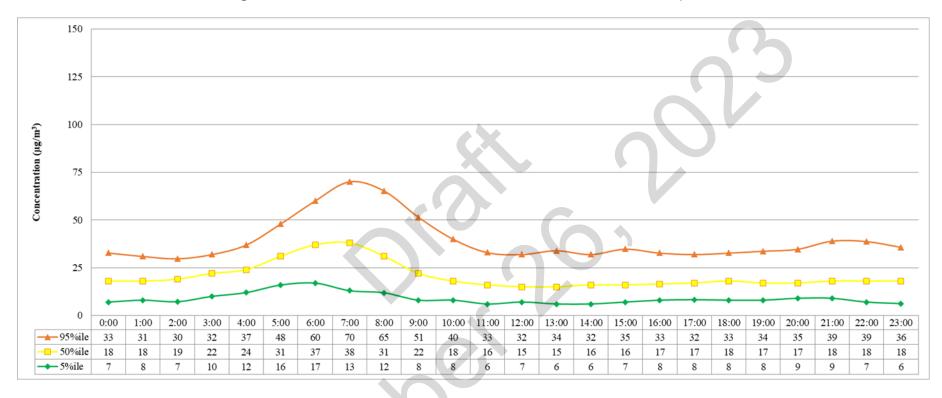


Figure 2-6: 2016-2020 Wildfire Season PM₁₀ Diurnal Pattern at Sparks



Dixie Fire

On July 13, 2021, the Dixie fire ignited on U.S. Forest Service land in the Plumas National Forest in Butte County, California, approximately 90 miles northwest of the Truckee Meadows region. The fire started when a tree fell onto a PG&E power transmission line and one of the fuses remained active, causing electric arcing onto wildfire fuels below. From then on, the fire grew rapidly over the next few months with some days showing an increase of up to 100,000 acres burned. Fire crews fought the fire until it was announced as fully contained on October 25, 2021. In total, the Dixie Fire burned 963,309 acres with a perimeter illustrated in Figure 2-7.

Antelope Fire

On August 1, 2021, the Antelope Fire was reported in the drainage of Antelope Creek in Klamath National Forest in Siskiyou County, California, approximately 180 miles northwest of the Truckee Meadows region. The fire was caused by a lightning strike during a thunderstorm. Red flag conditions caused the fire to grow quickly. Between August 5, and August 6 of 2021, extreme fire conditions were reported with flames over 100 feet in height. Over the next couple of months, the fire grew to 145,632 acres until it was fully contained on October 15, 2021. The perimeter of the fire is illustrated in Figure 2-7.

An important factor in the start of these fires was dry wildfire fuels. The fires took place in areas that were considered to be either Extreme or Exceptional Drought based on the U.S. Drought Monitor. Figure 2-8 shows what the U.S. Drought Monitor was on August 10, 2021 and illustrates how dry the wildfire fuels were at that time.

Figure 2-7: The Dixie and Antelope Fire in Relation to Washoe County

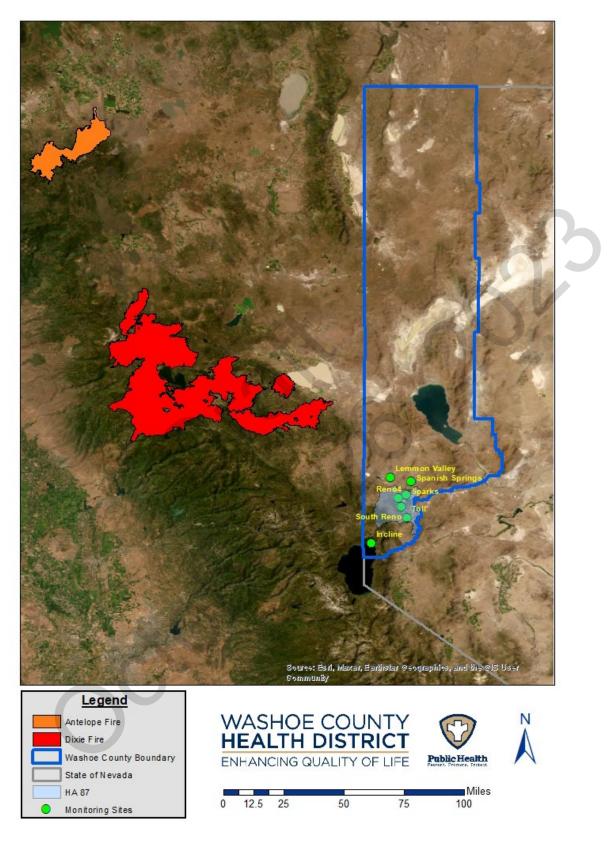
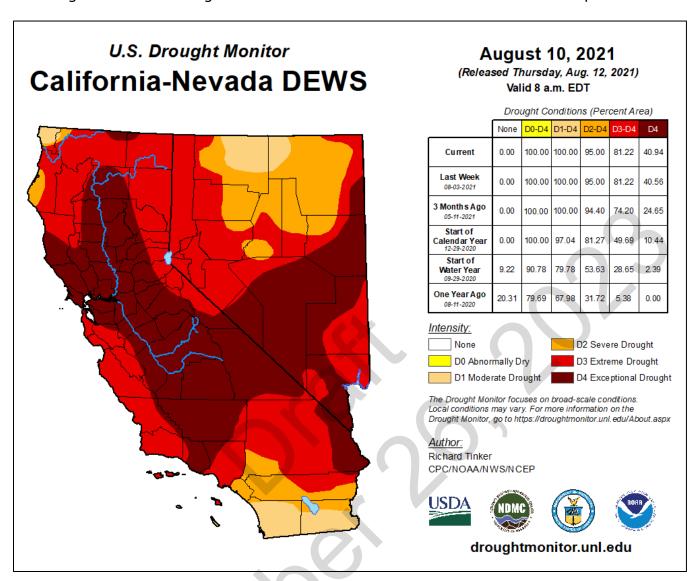


Figure 2-8: The Drought Conditions Near the Time of the Dixie and Antelope Fires



2.5.1 Data Requested to be Excluded

As was mentioned in Section 1.1 of this document, the purpose of this demonstration is to request exclusion of air quality data that was elevated due to exceptional events. Table 2-3 below shows the data that is requested to be excluded as part of this exceptional events demonstration and the corresponding 24-hour PM_{10} NAAQS averages. AQMD is requesting exclusion of all hourly PM_{10} data points on the days of the exceedances from 0000 PST through 2300 PST. For a complete list of each data point to be excluded, see Appendix D of this document.

Table 2-3: PM₁₀ Data Requested to be Excluded

Monitoring Site (AQS ID)	8/6/2021	8/7/2021		
Toll (AQS ID: 32-031-0025-81102-2)	156 μg/m³	-		
Reno4 (AQS ID: 32-031-0031-81102-2)	-	198 µg/m³		
Sparks (AQS ID: 32-031-1005-81102-4)	-	163 µg/m³		

2.5.2 Narrative of Air Quality Impacts

In early August of 2021, wildfire smoke was transported into the Truckee Meadows from the Dixie and Antelope Fires which eventually led to PM₁₀ exceedances on August 6, 2021 at the Toll air monitoring station and on August 7, 2021 at the Sparks and Reno4 air monitoring stations. On August 5, 24-hour PM₁₀ averages were as low as 23, 25, and 29 µg/m³ at Reno4, Sparks, and Toll respectively. By the next day, the 24-hour PM₁₀ average at Toll was 156 µg/m³. The next day, August 7, the 24-hour PM₁₀ average was 198 and 163 µg/m³ at Reno4 and Sparks, respectively. As the wind increased, the smoke vacated the Truckee Meadows and dropped the PM₁₀ concentrations back below the NAAQS. An overview of 24-hour average concentrations for PM₁₀ for the month of August 2021 is shown in Figure 2-9. Since this figure includes data for the whole month, it is important to note that this demonstration is only for the Dixie/Antelope event, the Dixie/Caldor event will have a separate EE demonstration. The days of the exceedances that are relevant to this demonstration are denoted by the red data points on August 6-7, 2021.

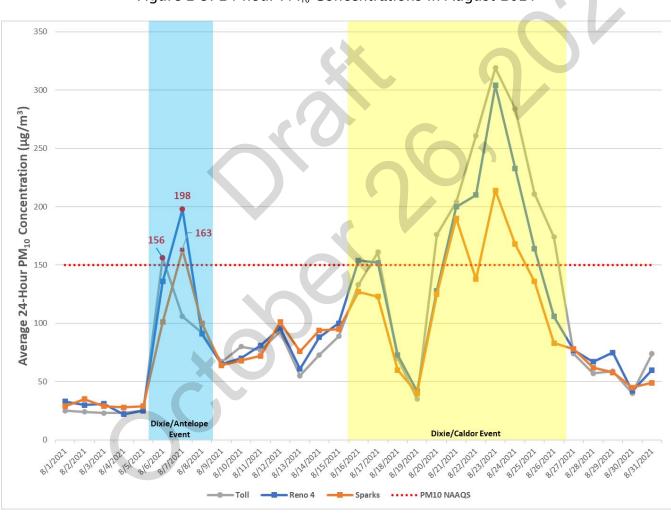


Figure 2-9: 24-hour PM₁₀ Concentrations in August 2021

The National Weather Service Office in Reno, Nevada provides at least two daily Area Forecast Discussions that summarize the short and long-term weather forecast for the area. It also provides a synopsis of current observations as well as weather events such as smoke and haze. Below are excerpts from Area Forecast Discussions issued on the days of the exceedances. This excerpt confirms that the previously mentioned sequence of events is accurate.

"Smoke from the Dixie Fire and other fires across northern CA will continue to pour into the Sierra/western NV with HRRR near surface smoke models bringing deteriorating conditions all the way south to Hawthorne and Mammoth Lakes. Afternoon mixing will only improve conditions slightly through Saturday as winds will generally be light. A bump in westerlies could briefly mix things a bit better Sunday before the surface flow resumes an unfavorable pattern of smoke transport Monday."

Excerpt from NWS-Reno Area Forecast Discussion (225 AM PDT Fri Aug 6 2021)

"Smoke has inundated much of western NV and the eastern Sierra with many locations reporting unhealthy air quality early this morning. There is not going to be much improvement today until later in the afternoon when some westerly zephyr winds arrive to help disperse some of the smoke, primarily from Reno southward along the eastern Sierra/far western NV mainly west of Hwy 95. Conditions will likely deteriorate farther to the east across the Basin and Range, including Fallon/Lovelock/Hawthorne as the smoke pushes eastward. HRRR near surface smoke models do not indicate any significant improvement potential until Sunday afternoon when we get a more pronounced afternoon breeze. On Monday, winds decrease and turn in a more unfavorable direction once again. So as long as the Dixie Fire remains active, expect another round of smoke Monday."

Excerpt from NWS-Reno Area Forecast Discussion (257 AM PDT Sat Aug 7 2021)

Satellite imagery also confirms the sequence of events of the exceedance. As can be seen in Figure 2-10 below, smoke from the Dixie and Antelope fires had not entered HA 87 as of August 5, 2021. As wind patterns shifted, smoke from the fires moved into HA 87 causing the exceedance on August 6, 2021, at Toll. This is seen in Figure 2-11 below. The smoke stayed in HA 87 and caused an exceedance on August 7, 2021, at Reno4 and Sparks. This is shown in figure 2-12 below. Within a few days, the smoke had mostly vacated HA 87 which can be seen in Figure 2-13 below. The maps shown in Figures 2-14, 2-15, 2-16, and 2-17 are daily weather maps that were issued by the National Weather Service around the time of the exceedance that provide extra evidence in support of the aforementioned sequence of events.

Figure 2-10: Satellite Imagery from August 5, 2021



Figure 2-11: Satellite Imagery from August 6, 2021

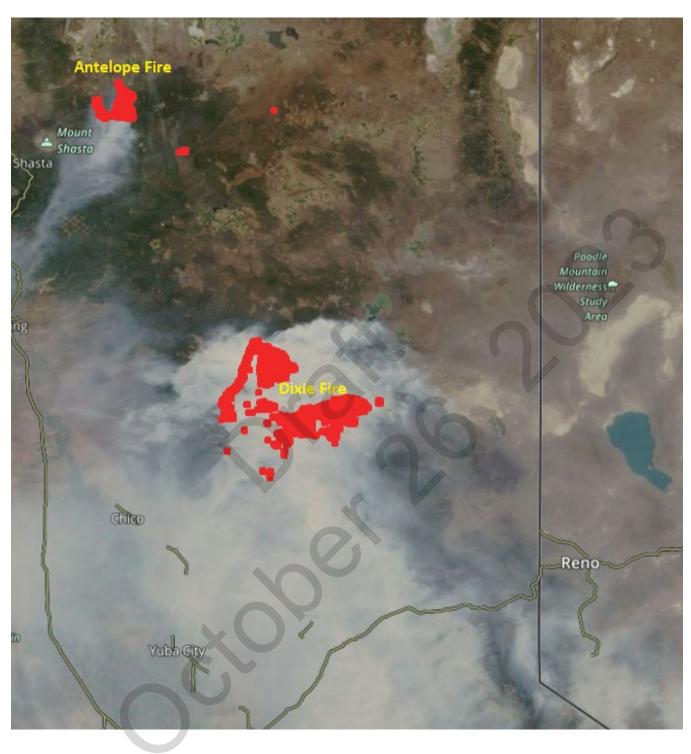


Figure 2-12: Satellite Imagery from August 7, 2021

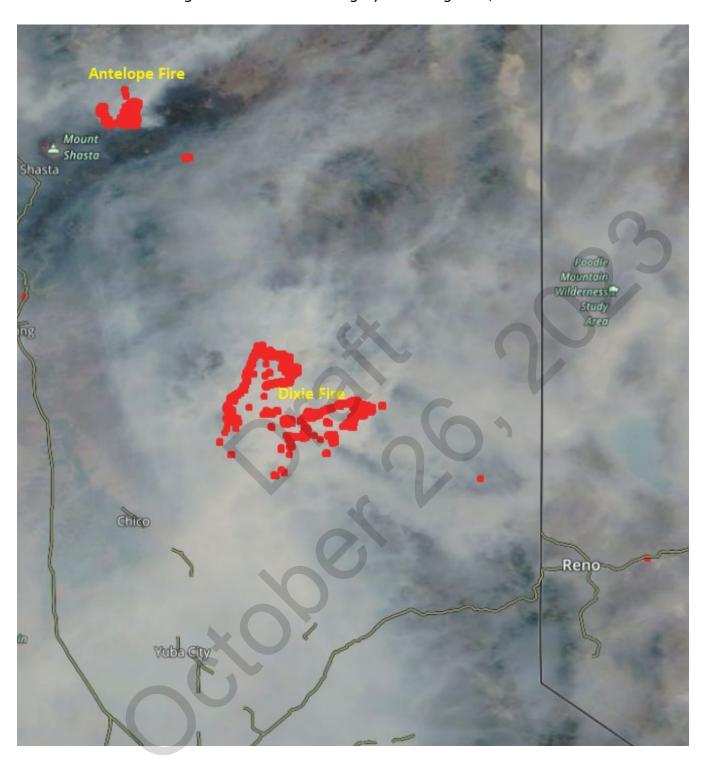


Figure 2-13: Satellite Imagery from August 9, 2021



Figure 2-14: Daily Weather Maps for Aug 5, 2021

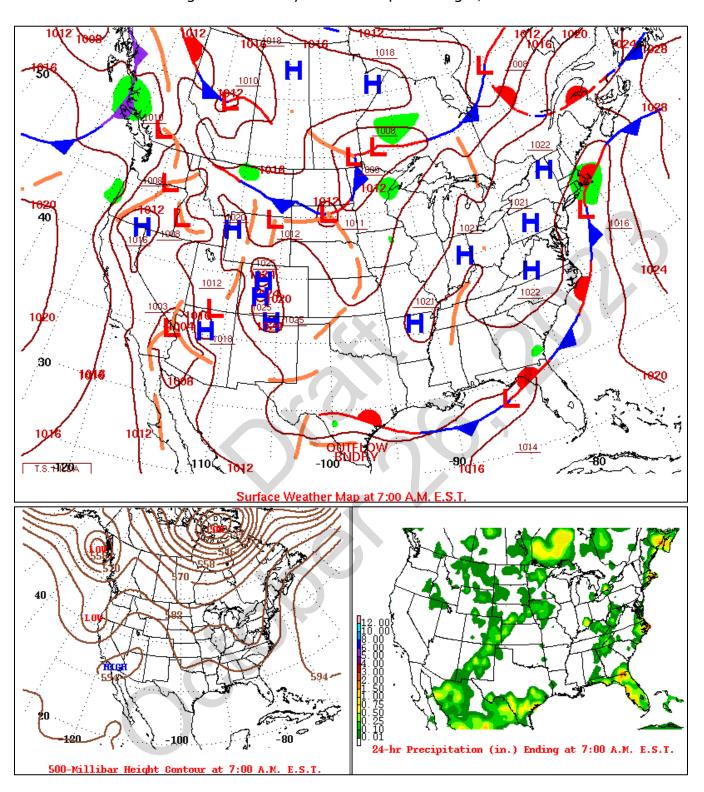


Figure 2-15: Daily Weather Maps for Aug 6, 2021

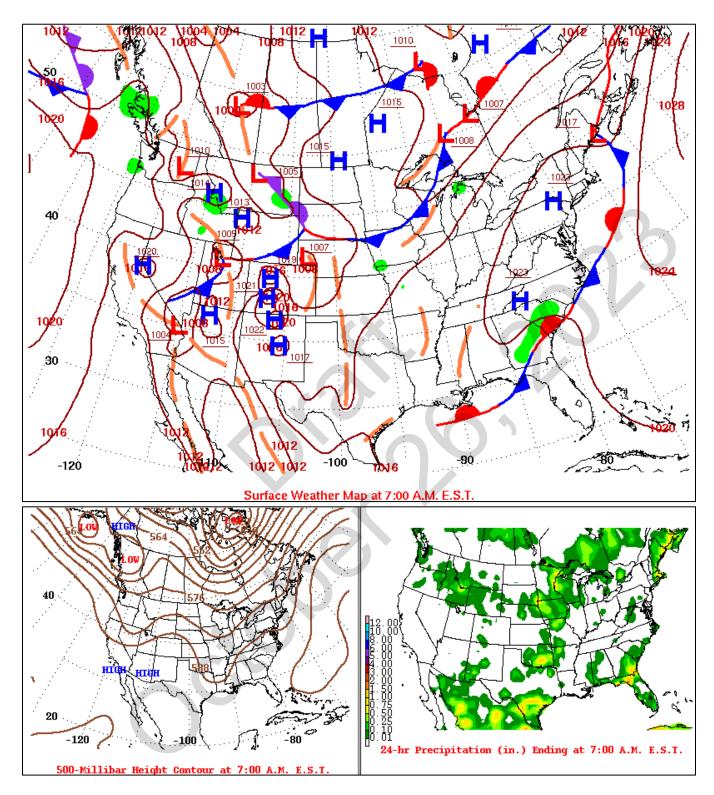


Figure 2-16: Daily Weather Maps for Aug 7, 2021

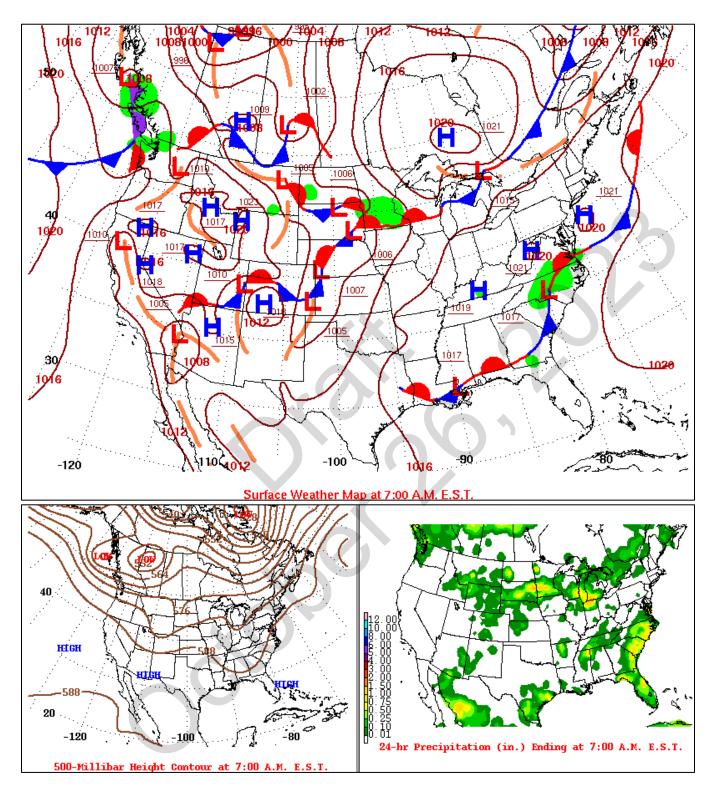
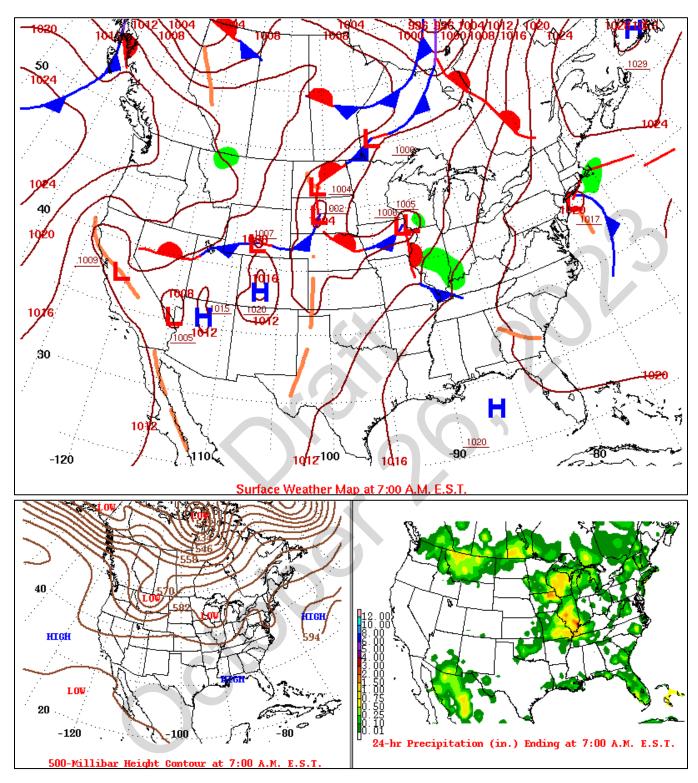


Figure 2-17: Daily Weather Maps for Aug 9, 2021



3.0 Not Reasonably Controllable or Preventable

Section 40 CFR 50.14 (c)(3)(iv)(D) requires a demonstration that the event was both not reasonably controllable and not reasonably preventable. Wildfires on wildland satisfy both requirements unless there is evidence to the contrary. This is explained in 40 CFR 50.14(b)(4) which states:

The Administrator shall exclude data from use in determinations of exceedances and violations where a State demonstrates to the Administrator's satisfaction that emissions from wildfires caused a specific air pollution concentration in excess of one or more national ambient air quality standard at a particular air quality monitoring location and otherwise satisfies the requirements of this section. Provided the Administrator determines that there is no compelling evidence to the contrary in the record, the Administrator will determine every wildfire occurring predominantly on wildland to have met the requirements identified in paragraph (c)(3)(iv)(D) of this section regarding the not reasonably controllable or preventable criterion.

As was shown in Figure 2-7, the wildfires that caused the PM_{10} exceedances on August 6-7, 2021, were both started in the State of California on US Forest Service land. According to the definition of wildland provided in 40 CFR Part 50, §50.1(o), both the Dixie and Antelope fires occurred on wildland because the areas that the fires started were in areas with little human activity.

40 CFR 50.1(o): Wildland means an area in which human activity and development are essentially non-existent, except for roads, railroads, power lines, and similar transportation facilities. Structures, if any, are widely scattered.

In addition, since the wildfires were not within the jurisdiction of Washoe County and the pollution impacts were due to interstate transport, there is no reasonable control method that AQMD could have taken to prevent the PM_{10} exceedances from happening. The exceedances were caused by the excessive PM_{10} emissions from the Dixie and Antelope fires, not from anthropogenic sources within Washoe County. This is proven beyond a reasonable doubt in Section 4 of this document, Clear Causal Relationship.

4.0 Clear Causal Relationship

4.1 Fire Emissions Analysis

As can be seen in Figure 2-9, smoke from the Dixie and Antelope fires impacted the Toll, Reno4, and Sparks PM₁₀ monitors starting on August 5, 2021. Between August 5 - August 7, 2021, the wildfires grew quickly and burned through large amounts of fuel, sending thousands of tons of emissions into the air, some of which was transported to the Truckee Meadows region, causing PM₁₀ exceedances. PM₁₀ emissions from the fire during this time frame were estimated by AQMD using the U.S Forest Service BlueSky Playground tool, Version 3.5. The inputs to the BlueSky Playground modeling tool include 1) Latitude and Longitude of fire origination, 2) Emissions Type, 3) Fuel Moisture Condition, 4) FCCS Fuelbed type and 5) acreage burned. For the Antelope Fire, the latitude and longitude were (41.5, -121.929), the emissions type was "Wildfire", the Fuel Moisture Condition was "Dry", and the FCCS Fuelbed type was "Fuel bed code 7 - Douglas-fir-sugar pine-tanoak forest." For the Dixie Fire, the latitude and longitude were (39.8713, -121.3894), the emissions type was "Wildfire", the Fuel Moisture Condition was "Dry", and the FCCS Fuelbed type was "Fuel bed code 16 - Jeffrey pine-ponderosa pine-Douglas Fir-California black oak forest." The Fuel Moisture Condition was determined to be "Dry" as a conservative estimate based on the U.S. Drought Monitor from August 10, 2021 shown in Figure 2-7. Fire acreage growth for both fires was determined by changes in acreage burned between daily Smoke Outlook reports issued by the Interagency Wildland Fire Air Quality Response Program. At most large wildfire events, a daily Smoke Outlook report is issued by an Air Resource Advisor that includes the size of the fire (in acres). By finding the difference in fire size listed on consecutive daily Smoke Outlook reports, daily fire growth can be calculated.

As can be seen in Table 4-1, the total PM_{10} emissions that resulted from the Antelope and Dixie Fires between August 5 and August 7, 2021 was approximately 93,171 tons. As was mentioned in Section 2.3, and as per the 2020 Emissions Inventory, Washoe County produces approximately 38,833 lbs/day of PM_{10} . That is a total of 7,087 tons over the course of the year. By comparison, the emissions from the Antelope Fire and Dixie Fire over this three-day period were over thirteen times the annual PM_{10} emissions that Washoe County produces.

Date	Antelope Fire Growth (Acres)	Dixie Fire Growth (Acres)	Antelope Fire PM ₁₀ Emissions (Tons)	Dixie Fire PM ₁₀ Emissions (Tons)	Total PM ₁₀ Emissions (Tons)
August 5, 2021	13,499	110,311	14,553.46	55,782.82	70,336.28
August 6, 2021	5,909	13,910	6,370.58	7,034.10	13,404.68
August 7, 2021	1,570	16,754	957.77	8,472.28	9,430.05
Total	20,978	140,975	21,881.81	71,289.2	93,171.01

4.2 Comparison of Event PM₁₀ Concentrations to Historical Concentrations

In order to prove that the day of the exceedance had abnormally high PM_{10} concentrations, AQMD compared the hourly data to what would be expected on a non-event day in wildfire season. AQMD completed a diurnal pattern analysis to do this. Each hour on the exceedance days were compared to the 5th percentile, 50th percentile, and 95th percentile of historical hourly concentrations. The historical concentrations were from the five-year period from 2016-2020 in the wildfire season of July-September. This analysis was done at the Toll, Reno4, and Sparks PM_{10} monitors. For the Reno4 historical PM_{10} concentrations of 2016, 2017, 2018, and 2019, Reno3 data was used to add to Reno4's 2020 data.

As can be seen in Figure 4-1, Figure 4-2, and Figure 4-3 below, the hourly PM₁₀ concentrations at Toll, Reno4, and Sparks on the days of the exceedances were much higher than what would be expected based on historical concentrations. Most hourly concentrations were orders of magnitude higher than what would be expected (50th percentile). Additionally, most hourly concentrations were much higher than the 95th percentile of the data set.

Figure 4-1: 2016-2020 PM₁₀ Diurnal Pattern Comparison for Toll on 08/06/21

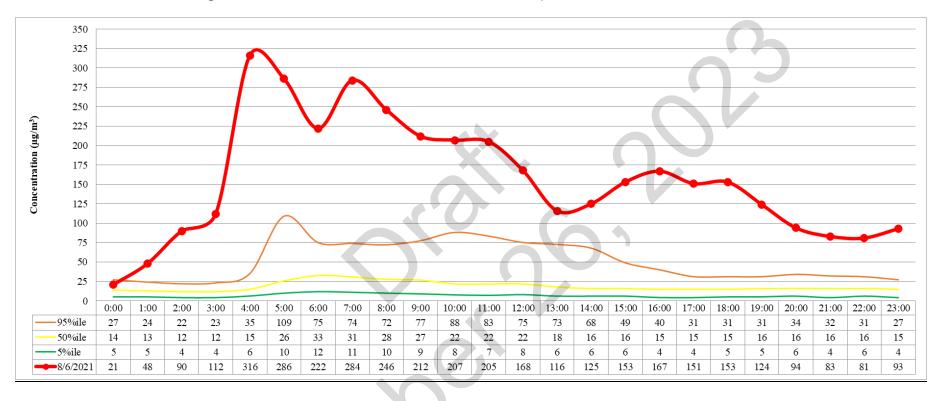


Figure 4-2: 2016-2020 PM₁₀ Diurnal Pattern Comparison for Reno4 on 08/07/21

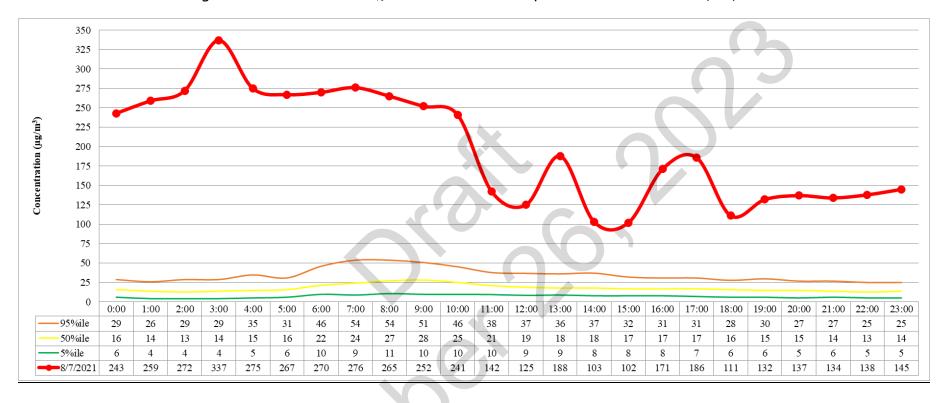
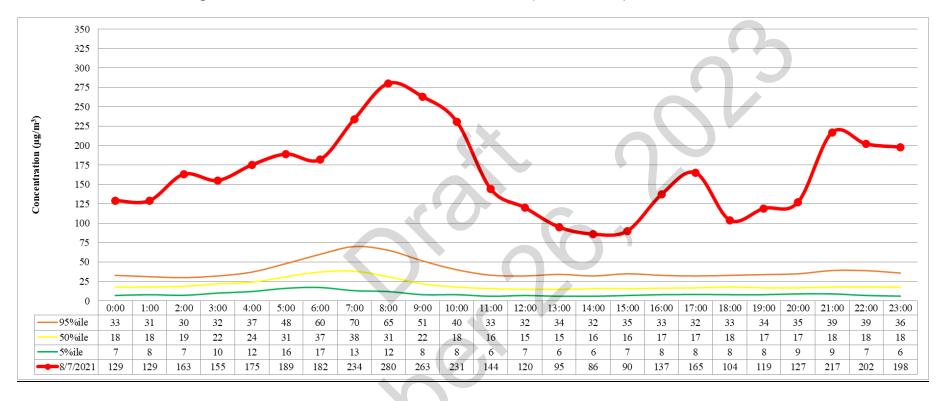


Figure 4-3: 2016-2020 PM₁₀ Diurnal Pattern Comparison for Sparks on 08/07/21



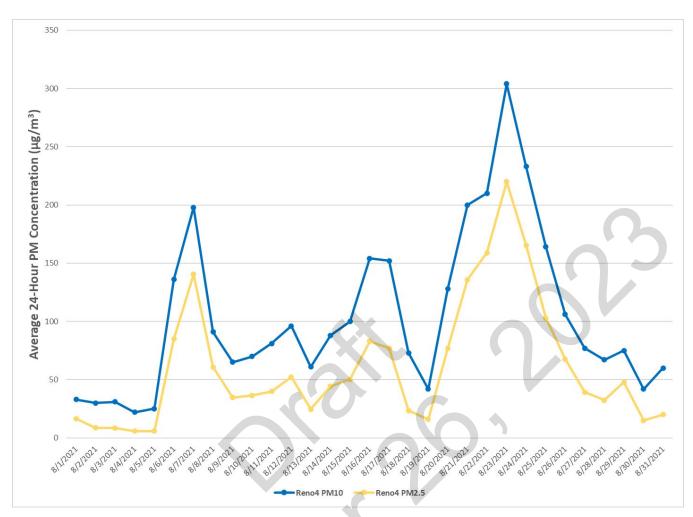
4.3.1 PM_{2.5} Concentrations

Although this demonstration is written for PM₁₀, analyzing the PM_{2.5} concentrations during the event supports this demonstration by highlighting that the fine particulate matter concentrations followed the same trend as PM₁₀. If the particulate is made up of smoke, PM_{2.5} and PM₁₀ should follow the same trend. If the particulate was made up of something else such as a geologic source, PM_{2.5} would not follow the same trend as PM₁₀. As can be seen in Figure 4-4, Figure 4-5, and Figure 4-6, concentrations of PM_{2.5} and PM₁₀ followed the same trend over duration of the event at all affected monitors, thus supporting AQMD's position that wildfire smoke was present.



Figure 4-4: 24-hour PM_{2.5} and PM₁₀ Concentrations at Toll in August 2021





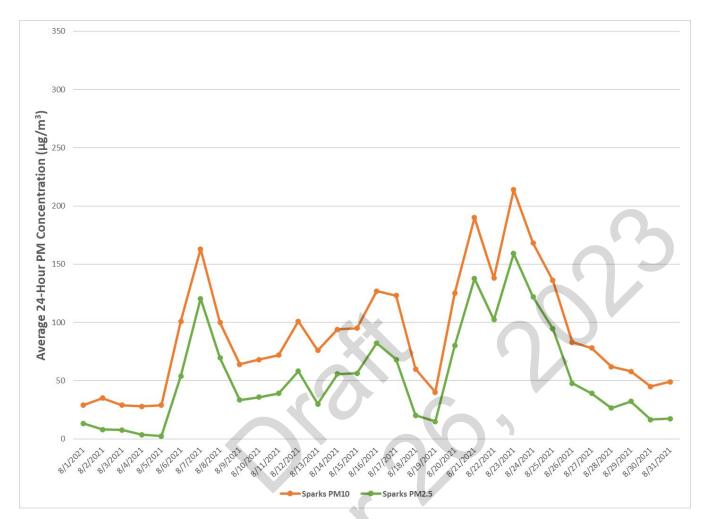


Figure 4-6: 24-hour PM_{2.5} and PM₁₀ Concentrations at Sparks in August 2021

Similar to PM_{10} , AQMD also completed a diurnal pattern analysis for $PM_{2.5}$. Each hour on the exceedance day was compared to the 5th percentile, 50th percentile, and 95th percentile of historical hourly concentrations. The historical concentrations were from non-event days in the five-year period from 2016-2020 during the wildfire season of July-September. This analysis was done for Reno4, and Sparks $PM_{2.5}$ on the days of the exceedances. Since Toll did not monitor for $PM_{2.5}$ until 2019, a diurnal was created for 2019-2020. For the Reno4 historical $PM_{2.5}$ concentrations of 2016, 2017, 2018, and 2019, Reno3 data was used to add to Reno4's 2020 data.

As can be seen in Figure 4-7, 4-8, and 4-9 below, nearly every hour of the exceedance was multiple times higher than what would be expected (50th percentile) and still much higher than the 95th percentile of the data set.

Figure 4-7: 2019-2020 PM_{2.5} Diurnal Pattern Comparison for Toll on 08/06/21

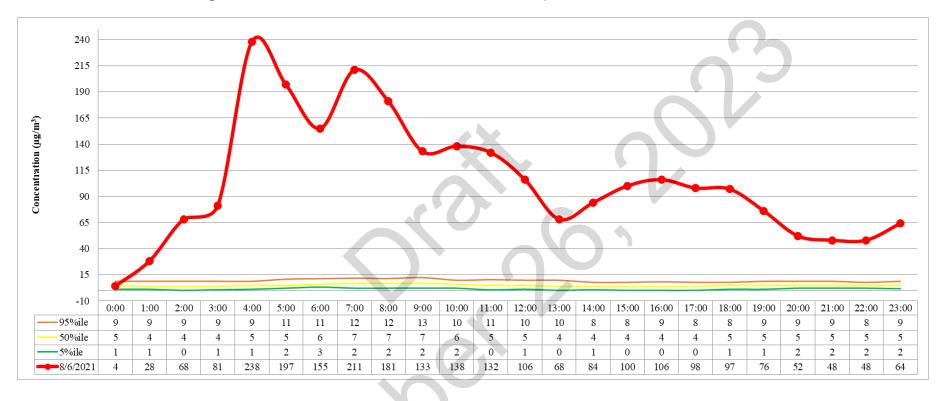


Figure 4-8: 2016-2020 PM_{2.5} Diurnal Pattern Comparison for Reno4 on 08/07/21

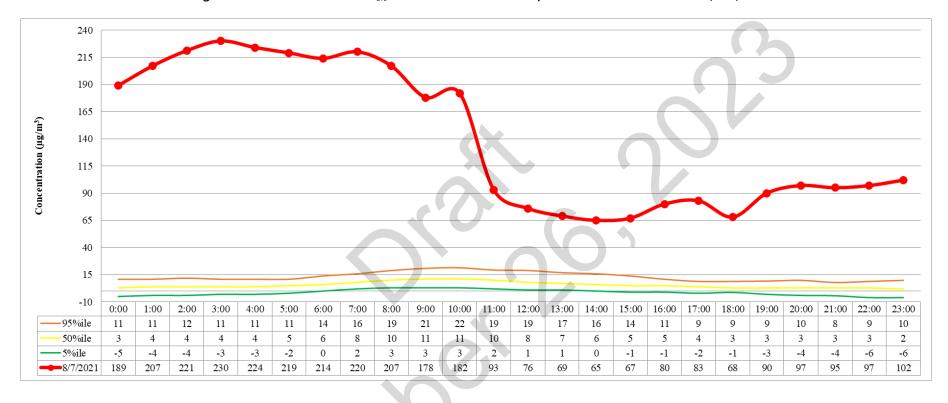
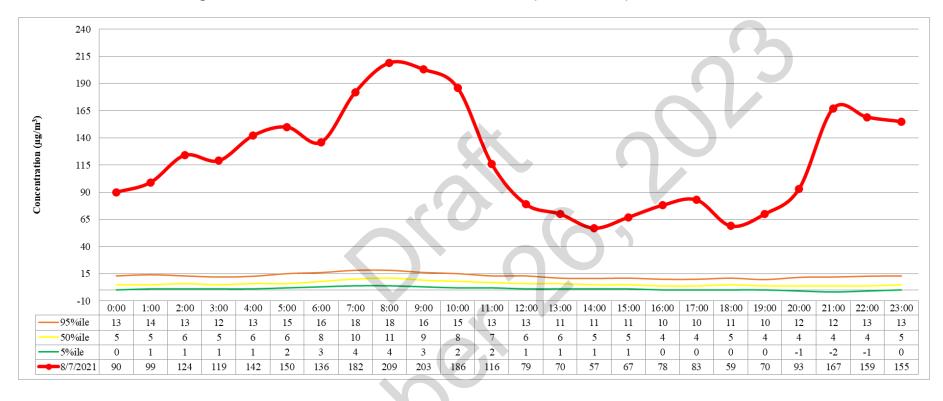


Figure 4-9: 2016-2020 PM_{2.5} Diurnal Pattern Comparison for Sparks on 08/07/21



$4.3.2 \text{ PM}_{2.5}/\text{PM}_{10} \text{ Ratio}$

One method for determining whether the elevated PM_{10} concentrations were caused by wildfire smoke is by analyzing the ratio of $PM_{2.5}$ to PM_{10} . If a higher fraction of the PM_{10} is made up of $PM_{2.5}$, this is indicative that smoke is present in the region. A lower $PM_{2.5}/PM_{10}$ ratio would mean that more of the particulate is larger than 2.5 microns and is most likely of a geologic origin. As can be seen in Table 4-2, Table 4-3, and Table 4-4, the $PM_{2.5}/PM_{10}$ ratio at Toll, Reno4, and Sparks started to increase on August 5, 2021, leading up to the exceedance days. The days of the exceedances are highlighted in yellow and show an elevated ratio compared to when the monitors were not affected by the wildfire smoke on August 5 of 2021.

Table 4-2: $PM_{2.5}/PM_{10}$ Ratios at Toll

Toll						
	24-hour Average (µg/m³)					
Date	PM _{2.5}	PM ₁₀	PM _{2.5} /PM ₁₀			
8/4/2021	2.8	23	0.12			
8/5/2021	0.4	25	0.02			
8/6/2021	104.7	156	0.67			
8/7/2021	68.9	106	0.65			
8/8/2021	61.3	92	0.67			
8/9/2021	31.9	67	0.48			
8/10/2021	42.7	80	0.53			

Table 4-3: PM_{2.5}/PM₁₀ Ratios at Reno4

Reno4						
	24-hour					
	(µg/m³)					
Date	PM _{2.5}	PM ₁₀	$PM_{2.5}/PM_{10}$			
8/4/2021	5.8	22	0.26			
8/5/2021	5.7	25	0.23			
8/6/2021	84.9	136	0.62			
8/7/2021	140.5	198	0.71			
8/8/2021	60.8	91	0.67			
8/9/2021	34.7	65	0.53			
8/10/2021	36.4	70	0.52			

Table 4-4: $PM_{2.5}/PM_{10}$ Ratios at Sparks

Sparks						
	24-hour Average (µg/m³)					
Date	PM _{2.5}	PM_{10}	$PM_{2.5}/PM_{10}$			
8/4/2021	3.6	28	0.13			
8/5/2021	2.4	29	0.08			
8/6/2021	53.9	101	0.53			
8/7/2021	120.5	163	0.74			
8/8/2021	69.5	100	0.70			
8/9/2021	33.3	64	0.52			
8/10/2021	35.8	68	0.53			

The PM_{2.5}/PM₁₀ ratio during the Dixie/Antelope event was higher than the rest of August 2021 and what would be expected on a typical summer day. AQMD determined what a typical summertime PM_{2.5}/PM₁₀ ratio would be by finding the regional average ratio during July-September between 2016 and 2020. The regional average ratio is the average of the Reno4 and Sparks PM_{2.5}/PM₁₀ ratios. The PM_{2.5}/PM₁₀ ratio that could be expected when not influenced by wildfire smoke or other events is 0.30. The ratios on the days of the exceedances were 0.67 at Toll on August 6, 2021, and 0.71 and 0.74 at Reno4 and Sparks respectively on August 7, 2021. The ratios were more than twice what would be expected, thus supporting AQMD's position that the exceedances were caused by wildfire smoke. Figure 4-10 illustrates this.

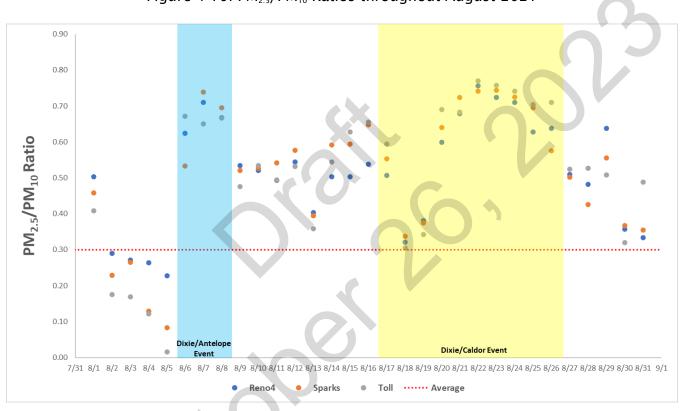


Figure 4-10: PM_{2.5}/PM₁₀ Ratios throughout August 2021

4.3.3 PM_{2.5}/CO Ratio

It has been documented that ambient PM_{2.5} and CO concentrations are correlated in the presence of wildfire smoke in urban areas.¹ AQMD completed a linear regression analysis that compared the PM_{2.5} and CO concentrations at the Reno4 and Sparks monitoring sites on the days of the exceedances. Since the Toll monitoring site does not measure CO, this same analysis was done using Reno4 as a proxy. This information was then compared to a linear regression analysis completed for a non-event day on July 13, 2021. The equation and coefficient of determination (R²) that resulted from the linear regression on the non-event day is shown below.

Non-Event Slopes (July 13, 2021) Reno4: y = -2.5812x + 6.3198 $R^2 = 0.0021$ Sparks: y = 2.6136x + 3.017 $R^2 = 0.0028$

As can be seen in Figure 4-11, Figure 4-12, and Figure 4-13, a strong correlation was found on the days of the exceedances between $PM_{2.5}$ and CO concentration. The coefficient of determination for Reno4 on the August 6 exceedance was 0.8738. The coefficient of determination for Reno4 and Sparks on the August 7 exceedance was 0.9769 and 0.7865, respectively. This signals a presence of wildfire smoke on the days of the exceedances.

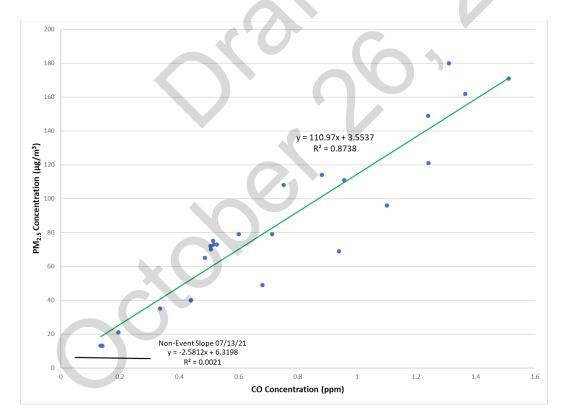


Figure 4-11: Hourly PM_{2.5}/CO at Reno4 on August 6, 2021

¹ Jaffe, D. A., Schnieder, B., and Inouye, D.: Technical note: Use of PM₂₅ to CO ratio as an indicator of wildfire smoke in urban areas, Atmos. Chem. Phys., 22, 12695–12704, https://doi.org/10.5194/acp-22-12695-2022, 2022.

Figure 4-12: Hourly PM_{2.5}/CO at Reno4 on August 7, 2021

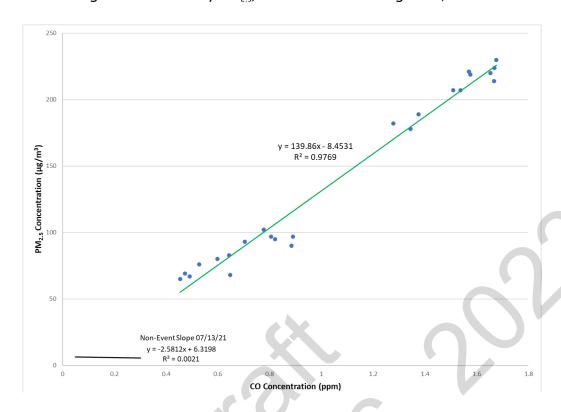
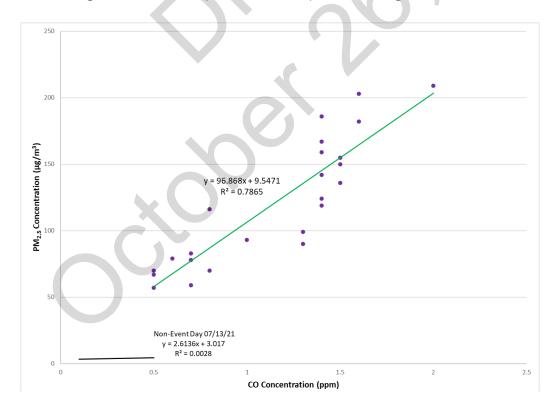


Figure 4-13: Hourly PM_{2.5}/CO at Sparks on August 7, 2021



4.3.4 PM₁₀/CO Ratio

When an area has the presence of wildfire smoke, the CO and PM_{10} concentrations should also be correlated, although not as strongly correlated as CO and $PM_{2.5}$. Similar to section 4.3.3, a linear regression analysis was completed with CO and PM_{10} data on the days of the exceedances and compared to a non-event day on July 13, 2021. Since the Toll monitoring site does not measure CO, this same analysis was done using Reno4 as a proxy. The equation and coefficient of determination that resulted from the linear regression on the non-event day is shown below.

```
Non-Event Slopes (July 13, 2021)
Reno4: y = 107.41x + 8.5459 R^2 = 0.2209
Sparks: y = 66.023x + 11.528 R^2 = 0.4516
```

As can be seen in Figure 4-14, Figure 4-15, and Figure 4-16, a strong correlation was found on the days of the exceedances between PM_{10} and CO concentration. The coefficient of determination for Reno4 on the August 6 exceedance was 0.8719. The coefficient of determination for Reno4 and Sparks on the August 7 exceedance was 0.8419 and 0.7311, respectively. This also signals the presence of wildfire smoke in the region on the day of the exceedance.

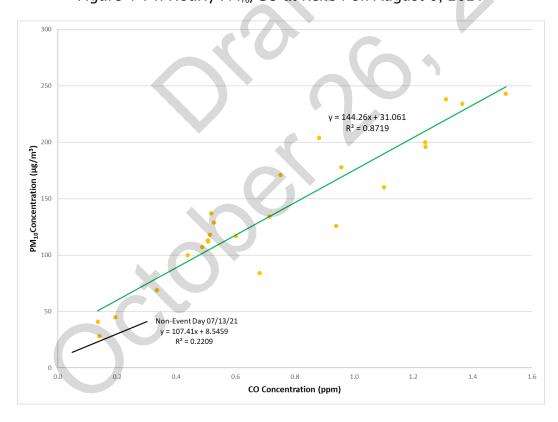


Figure 4-14: Hourly PM₁₀/CO at Reno4 on August 6, 2021

Figure 4-15: Hourly PM_{10}/CO at Reno4 on August 7, 2021

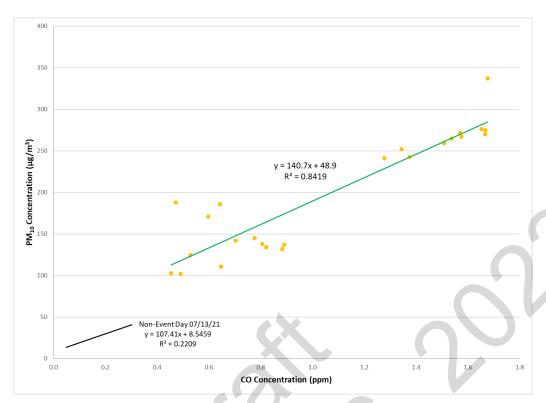
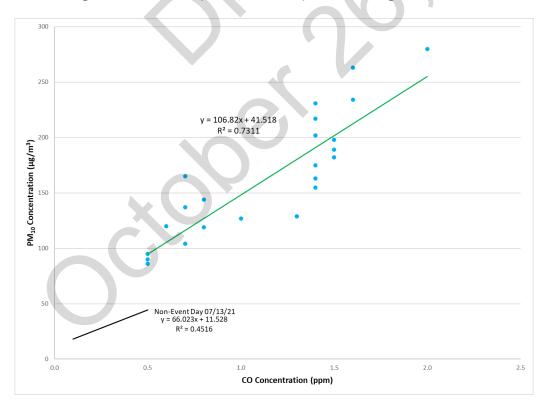


Figure 4-16: Hourly PM₁₀/CO at Sparks on August 7, 2021



4.4 Trajectory Analysis

A trajectory analysis was completed for the event using the Hybrid Single Particle Lagrangian Integrated Trajectory (HYSPLIT) model to compute simple air parcel trajectories and determine where the smoke originated from. The HYSPLIT model's calculation method is a hybrid between the Lagrangian approach, which uses a moving frame of reference as the air parcels move from their initial location, and the Eulerian approach, which uses a fixed three-dimensional grid as a frame of reference. The trajectory models in this section were created with the EPA AirNow-Tech Navigator page and the HYSPLIT model was provided by NOAA's Air Resources Laboratory. The model used the North American Mesoscale Model (NAM) 12-kilometer domain. Each HYSPLIT was completed at 50, 1000, and 2500 meters above ground level (agl). These values were chosen to best illustrate the dynamics of the air mass that affected the Washoe County region before and during the days of the exceedances. According to NWS-Reno, 50 meters agl is a good proxy for boundary layer height in the region. The HYSPLIT figures below include the "HMS Fire" layer which shows the location of each fire, the "HMS Smoke" layer which shows where smoke is at the time, and the 24-hour, midnight to midnight average PM₁₀ concentration in µg/m³ for each air monitoring site in the region.

4.4.1 Monitoring Site Analysis - Backward Trajectory

In order to accurately understand where the affected airmass originated from, AQMD completed 24-hour backward trajectory HYSPLIT models from the affected PM_{10} monitors at Toll, Reno4, and Sparks. In the figures below, the green line denotes 50 meters agl, the blue line denotes 1000 meters agl, and the red line denotes 2500 meters agl. The points on each line denote 6-hour increments. Because this section is for backward trajectory HYSPLIT models, the first point on the line would denote 6-hours before the start time of the model.

Figure 4-17: Backward Trajectory from Toll starting August 6, 2021 at 0000 PST

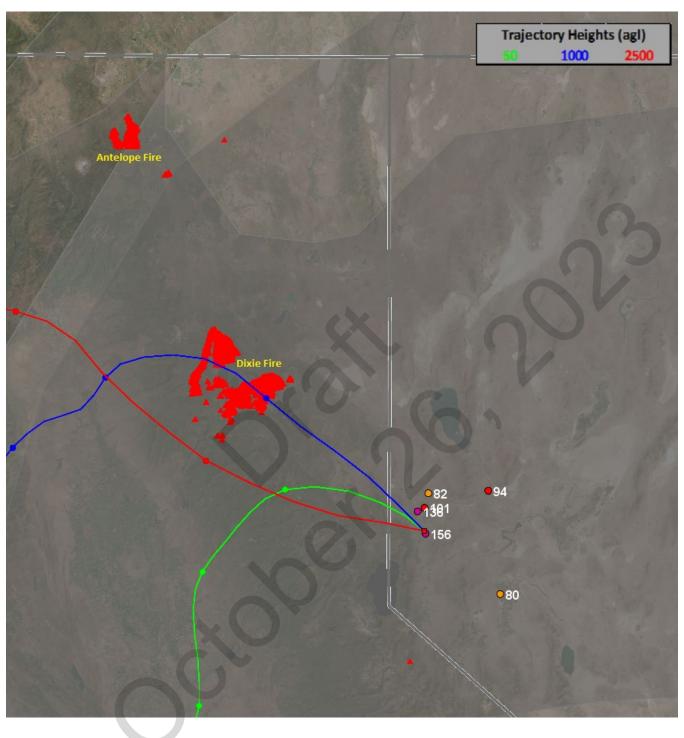


Figure 4-18: Backward Trajectory from Toll starting August 7, 2021 at 0000 PST

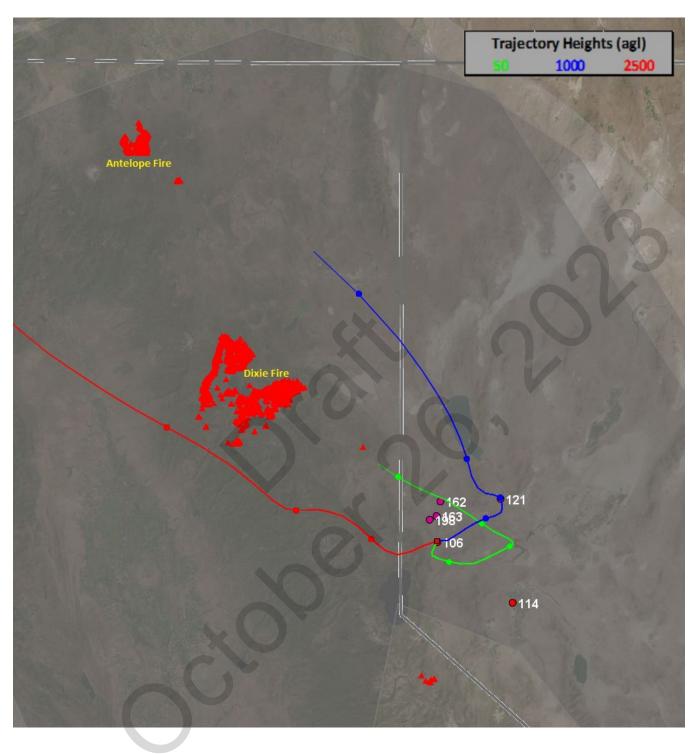


Figure 4-19: Backward Trajectory from Reno4 starting August 7, 2021 at 0000 PST

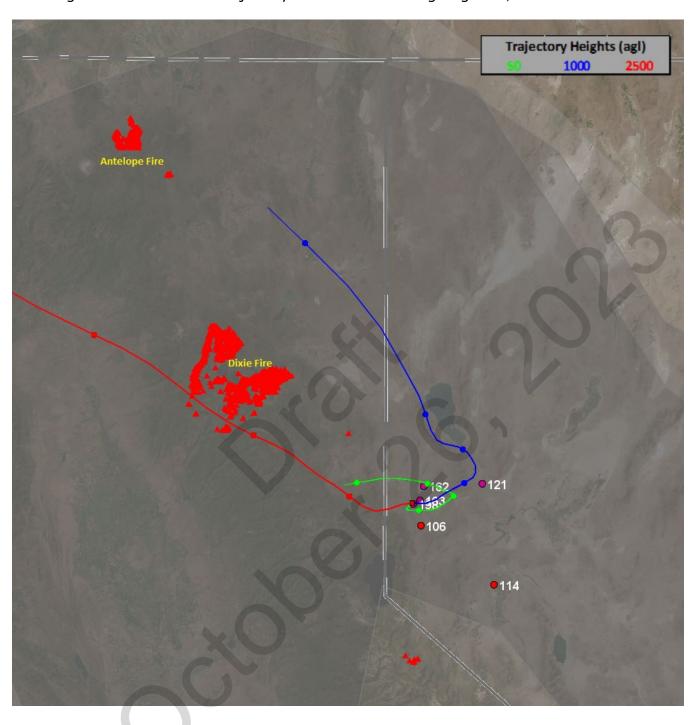


Figure 4-20: Backward Trajectory from Sparks starting August 7, 2021 at 0000 PST

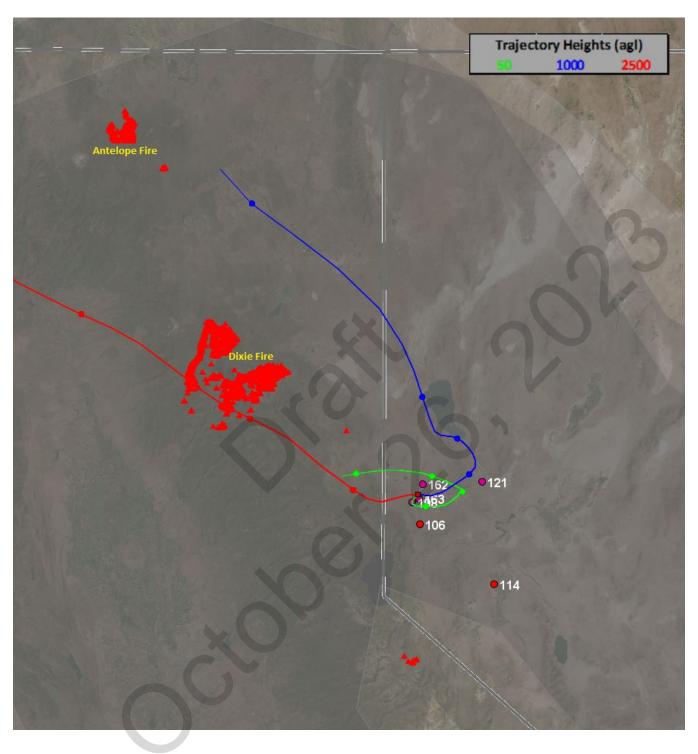


Figure 4-21: Backward Trajectory from Reno4 starting August 8, 2021 at 0000 PST

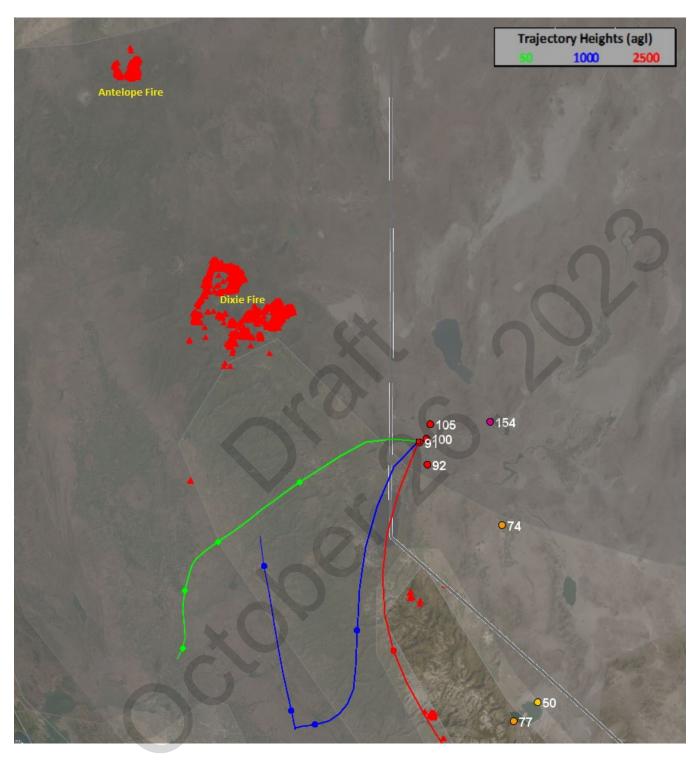
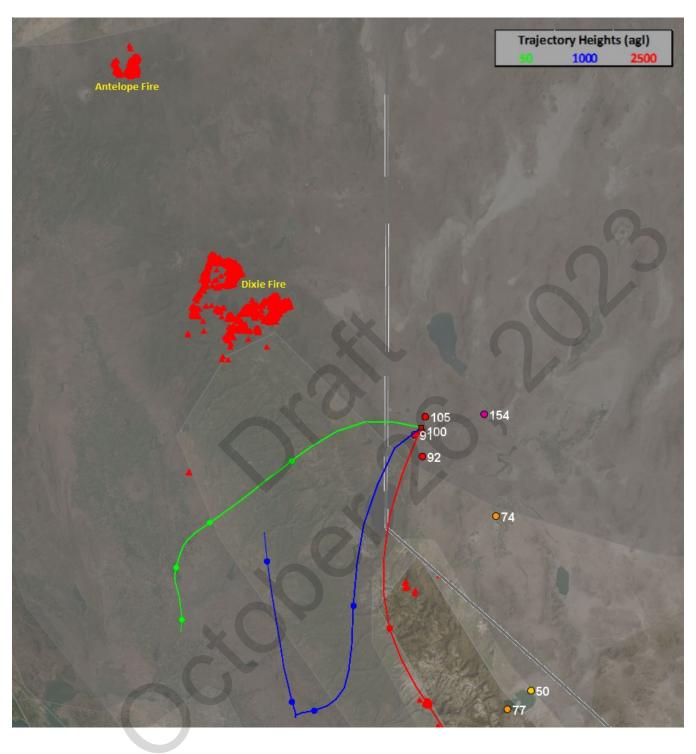


Figure 4-22: Backward Trajectory from Sparks starting August 8, 2021 at 0000 PST



4.4.2 Source Analysis - Forward Trajectory

In order to fully understand where smoke emissions from each fire moved prior to and on the days of the exceedances, an emissions source analysis was done which included 24-hour forward trajectory HYSPLIT models from both the Antelope and Dixie fires. In the figures below, the green line denotes 50 meters agl, the blue line denotes 1000 meters agl, and the red line denotes 2500 meters agl. The points on each line denote 6-hour increments. Because this section is for forward trajectory HYSPLIT models, the first point on the line would denote 6-hours after the start time of the model.

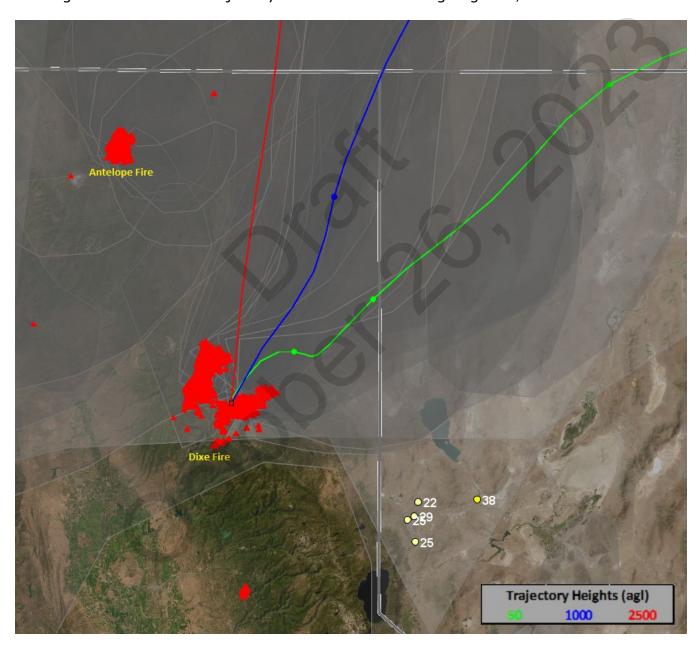


Figure 4-23: Forward Trajectory from Dixie Fire starting August 5, 2021 at 0000 PST

Figure 4-24: Forward Trajectory from Antelope Fire starting August 5, 2021 at 0000 PST

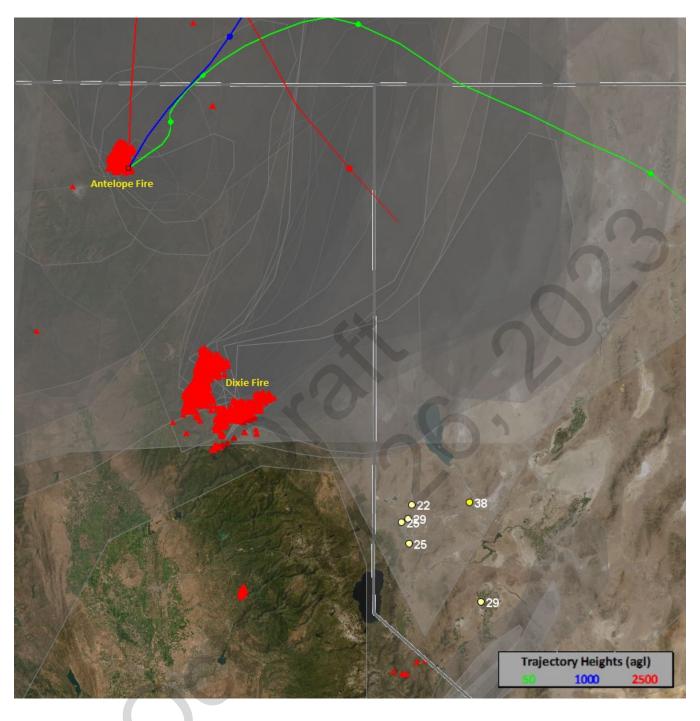


Figure 4-25: Forward Trajectory from Dixie Fire starting August 6, 2021 at 0000 PST

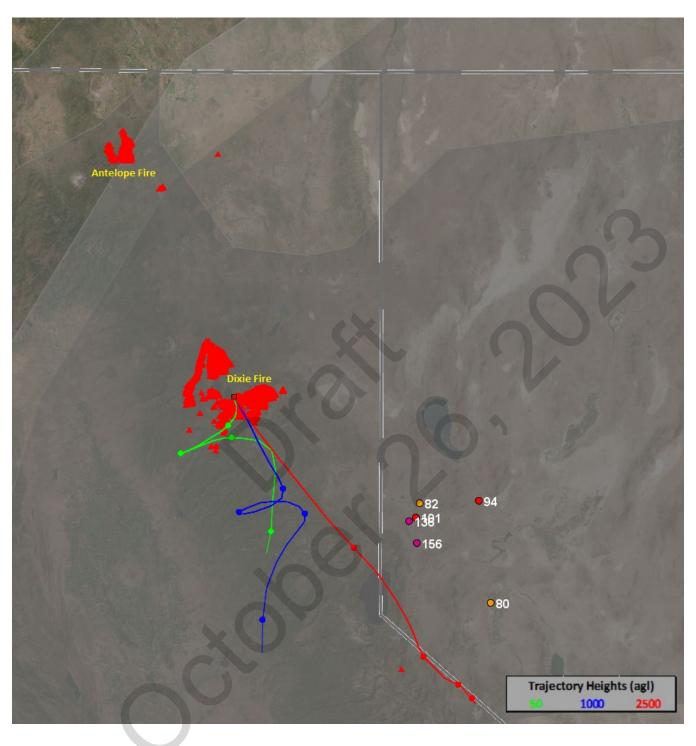


Figure 4-26: Forward Trajectory from Antelope Fire starting August 6, 2021 at 0000 PST

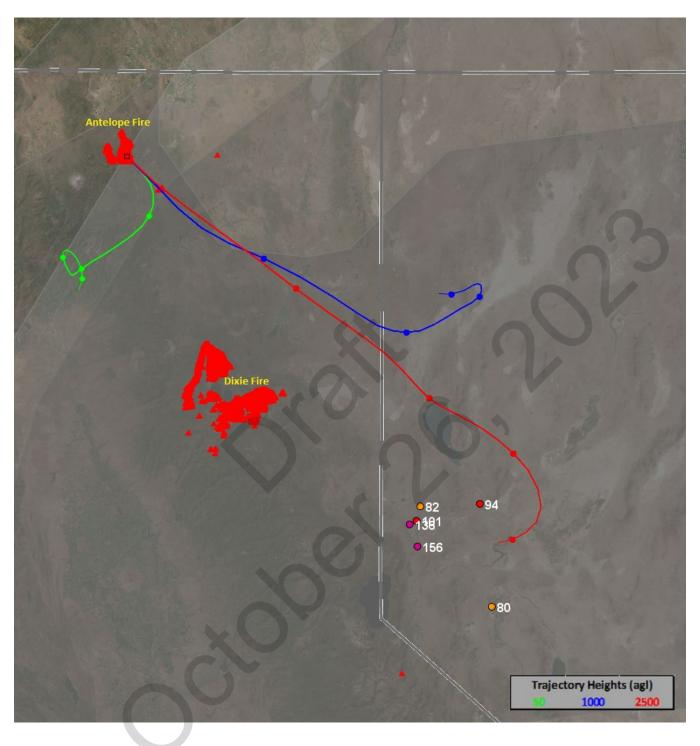


Figure 4-27: Forward Trajectory from Dixie Fire starting August 7, 2021 at 0000 PST

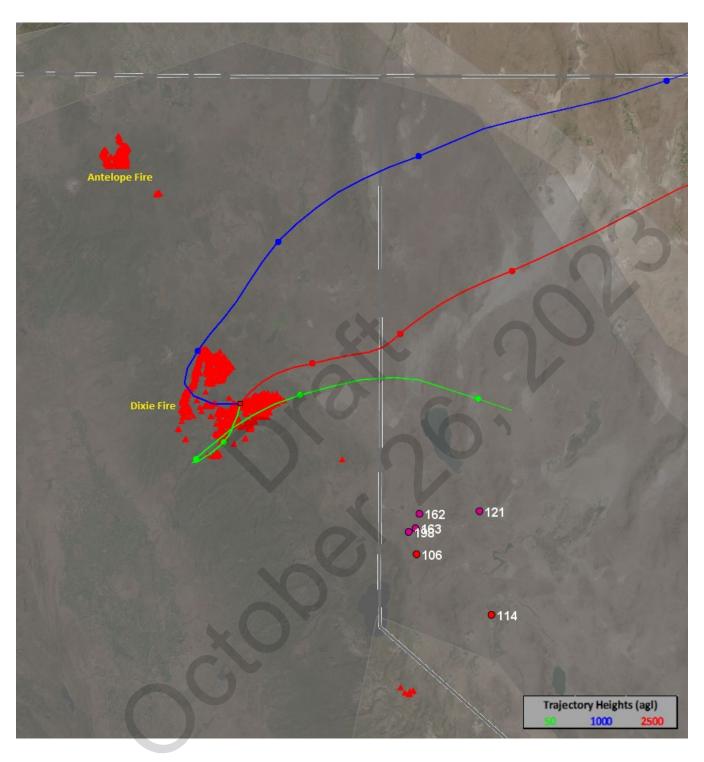
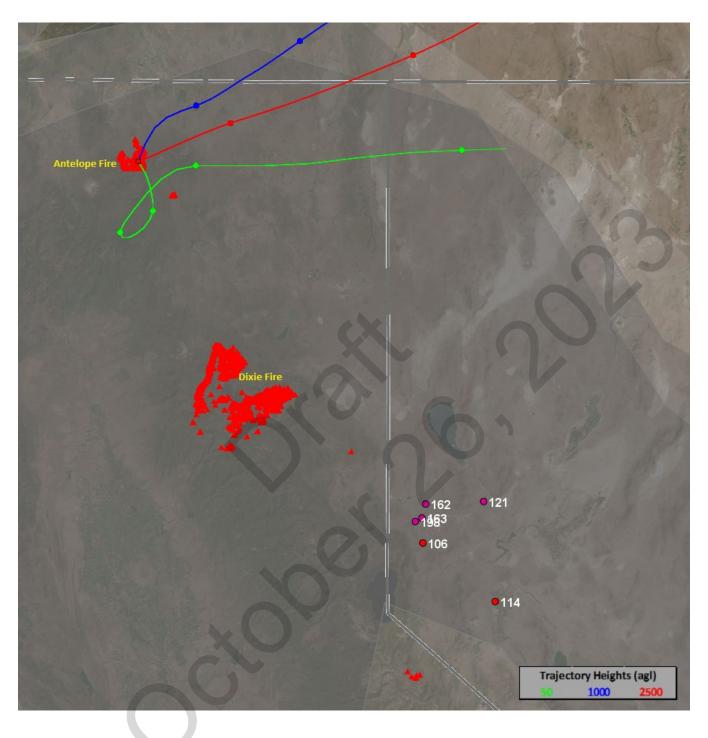


Figure 4-28: Forward Trajectory from Antelope Fire starting August 7, 2021 at 0000 PST



4.4.3 Trajectory Analysis Explanation

The methodology behind this section is to bracket the exceedance days with forward and backward HYSPLITs. A forward trajectory was completed for August 5, August 6, and August 7 of 2021 to accurately depict the characteristics of the wildfire smoke that would have affected HA 87 on the exceedance days. A backward trajectory was completed for August 6, August 7, and August 8 of 2021 to characterize where the airmass on the exceedance days came from.

As can be seen in the backward trajectory section, the airmasses at 50, 1000, and 2500 meter agl on August 6 and August 7, 2021 all originated at or near the Dixie or Antelope fires. The backward trajectories on August 8, 2021 shows how wind patterns shifted to vacate the smoke from the region and led to lower PM₁₀ concentration in the days following the exceedances. As can be seen in the forward trajectory section, the smoke from the Dixie and Antelope fires was transported into HA 87 between August 5 and August 7 of 2021 with August 6, 2021 having the most direct wildfire smoke transport. Similar to the backward trajectory section, the forward trajectories on August 7, 2021 show the changing wind patterns that decreased PM₁₀ concentrations following the exceedances.

Using the AirNow-Tech Navigator Rose Tool, wind/pollution roses were generated for Toll, Reno4, and Sparks monitoring sites for the days leading to and the days of the exceedances. Hourly PM_{10} and wind direction data was used to create the roses. These show predominantly westerly and southerly wind components that carried Dixie and Antelope wildfire smoke to Washoe County.

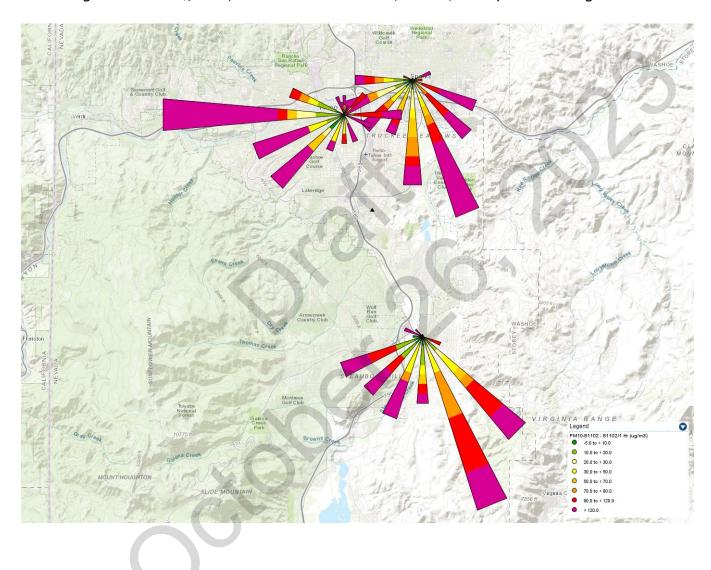


Figure 4-29: PM₁₀ Wind/Pollution Rose for Toll, Reno4, and Sparks for August 5-7

Section 4.0 of this document demonstrates that the elevated PM_{10} concentrations that led to an exceedance of the primary and secondary PM_{10} NAAQS was caused by the Dixie and Antelope wildfires. The emissions analysis, historical concentration comparison analysis, $PM_{2.5}$ analysis, $PM_{2.5}/PM_{10}$ ratio analysis, $PM_{2.5}/CO$ ratio analysis, PM_{10}/CO ratio analysis, trajectory analysis, and pollution rose analysis all support this premise.

The comparisons and statistical analyses provided in this section of the document supports AQMD's demonstration that the Dixie and Antelope wildfire events affected air quality in such a way that there exists a clear causal relationship between the specific events and the monitored PM_{10} exceedance on August 6 and 7, 2021. Section 4.0 thus satisfies the clear causal relationship criterion as required by the EER and 40 CFR 50.14(c)(3)(iv).

5.0 Natural Event or Human Activity Unlikely to Recur

Section 40 CFR 50.14(c)(3)(iv)(E) requires that an exceptional event be unlikely to recur at a particular location or was a natural event. The Dixie and Antelope Fires qualify as natural events because human activity played no direct causal role in the start of the fires. A natural event as per 40 CFR 50.1(k) is defined as:

40 CFR 50.1(k): Natural event means an event and its resulting emissions, which may recur at the same location, in which human activity plays little or no direct causal role. For purposes of the definition of a natural event, anthropogenic sources that are reasonably controlled shall be considered to not play a direct role in causing emissions.

As was mentioned in Section 2.4 of this document, the Antelope Fire was started by a lightning strike hitting a tree and the Dixie Fire was started by a tree falling on a power transmission line. AQMD sees no direct causal role by human activity, thus qualifying these wildfires as natural events.

6.0 Public Outreach

An important role that AQMD plays during exceptional events that affect air quality is to notify the public of the current air quality, the air quality forecast, and ways to mitigate potential health impacts that are a result of degraded air quality. Examples of this public outreach showing the current air quality and the forecast for the coming days can be seen in Figure 6-1. AQMD has a public education program called "Be Smoke Smart" that informs citizens of the best ways to protect themselves from wildfire smoke. Figure 6-2 shows a social media post on the day of the exceedance with "Be Smoke Smart" information so that people could take the proper precautions.

In order to reach the public, AQMD uses Twitter, Facebook, press releases, and local partners to properly inform citizens. One local partner that is beneficial is National Weather Service (NWS) – Reno. Working together, AQMD and NWS-Reno are able to better reach the public through their respective social media networks. An example of this is shown in Figure 6-3. In addition, AQMD communicates with local news outlets through interviews and press releases. Figure 6-4 shows a press release that was made near the time of the event to inform local news outlets so that they could properly report on the event. This press release in addition to the other outreach actions also fulfills the public notification requirements of the Emergency Episode Plan and the PM_{2.5} Mitigation Plan.

Figure 6-1: Public Notification of Poor Air Quality during the 08/06/21 Exceedance

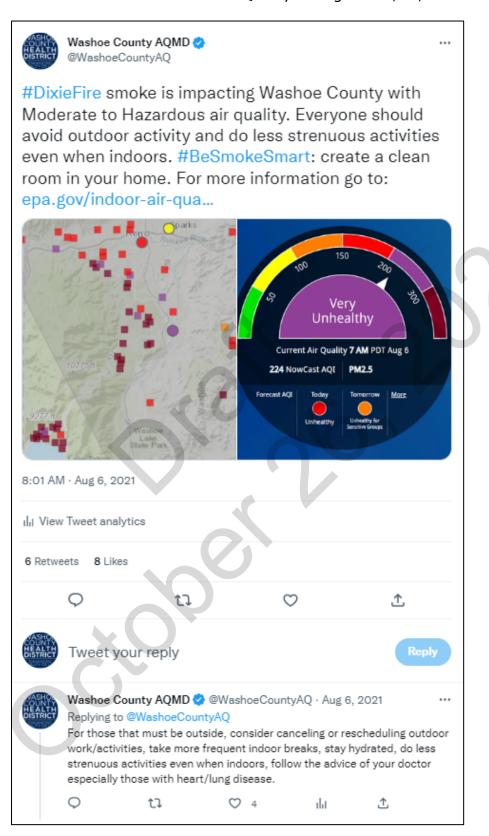


Figure 6-2: Be Smoke Smart Social Media Post from the day of the 08/06/21 Exceedance



You know the current AQI. You know where the wildfires are. What can you do now? There are some actions you can take. #BeSmokeSmart. Protect yourself and others from wildfire smoke.



- 1. Reduce or stop outdoor activity.
- 2. Keep AC on if available, the fresh-air intake closed, filter clean, and windows closed.
- 3. Pay attention to air quality on AirNow.gov.
- 4. Follow the advice of your doctor especially those with heart or lung disease.
- Wet or dry cloth, dust, or surgical masks do not protect you from ozone or fine particulates.
- If you are a healthy adult and you must be outside, respirators marked NIOSH N95 can provide some protection from fine particulates with adequate fit.
- 7. Stay hydrated. Take more breaks if exerting yourself outside.
- 8. Keep indoor air clean; don't burn candles, vacuum, or smoke tobacco products.
- Use a portable air purifier. Create a clean air room in your home.
- Consider relocating temporarily.



11:52 AM · Aug 6, 2021

Figure 6-3: NWS-Reno Post that was Reposted by AQMD

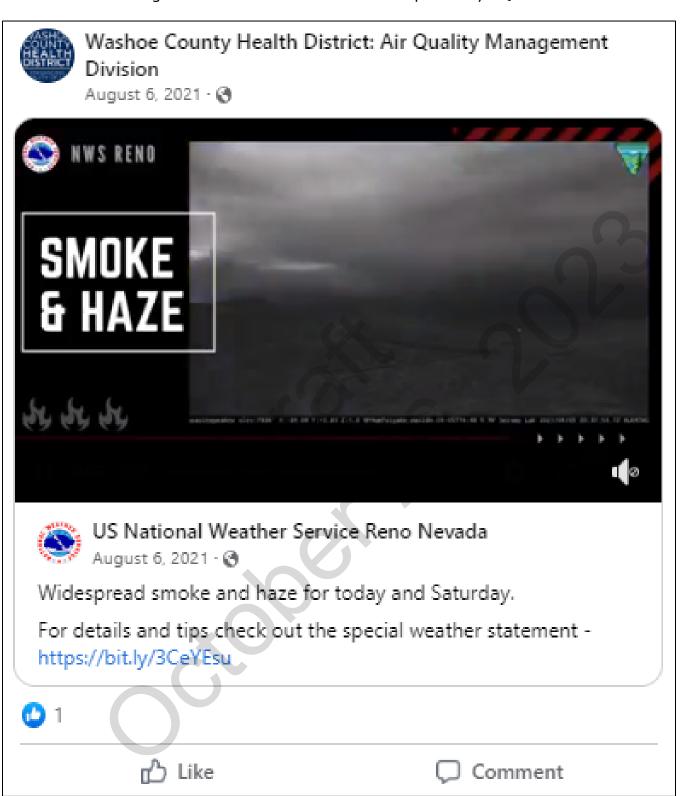


Figure 6-4: Press Release from AQMD During Exceptional Event

UPDATE: HEALTH DISTRICT ISSUES STAGE 2 EMERGENCY EPISODE

by Matthew Clark | Aug 6, 2021



Reno/Sparks, Nev. August 5, 2021 – The Washoe County Health District – Air Quality Management Division (AQMD) has issued a Stage 2 Emergency Episode due to anticipated smoke from area wildfires. The air quality index (AQI) for the Reno-Sparks area is expected reach "Unhealthy" to "Very Unhealthy" at times Friday, Saturday, and Sunday.

The Stage 2 Emergency Episode means that all residents should stay indoors and reduce activity levels due to the susceptibility of increased health risks. This is the third time AQMD has issued a Stage 2 (last time July 24, 2021). The Dixie Fire continues to be the main wildfire contributing to the poor air quality.

To see current air quality in Reno-Sparks, click here; for information on what the air quality index colors mean, click here.

Periods of heavy smoke and clearing may rapidly fluctuate during the weekend depending on wind patterns. AQMD has issued these recommendations to reduce exposure to smoke:

- Avoid or reduce outdoor and physical activities
- Stay indoors with the windows and doors closed; if possible, run the air conditioner on recirculation function
- Avoid using a swamp cooler or whole-house fan to prevent bringing additional smoke inside
- · Consult your physician for health questions, especially those with heart and lung issues

AQMD can issue a Stage 1, Stage 2, or Stage 3 notifications with the Stage 3 Emergency Episode being the most severe. More information on the stages can be found here.

Visit OurCleanAir.com for additional information on the Air Quality Management Division.

7.0 Conclusions and Recommendations

The Antelope Fire was started on August 1, 2021, when a lightning strike hit a tree in the Antelope Creek in Klamath National Forest, approximately 180 miles northwest of the Truckee Meadows. The Dixie Fire was ignited on July 13, 2021, when a tree fell on a power line in Plumas National Forest, approximately 90 miles northwest of the Truckee Meadows. Both fires emitted large quantities of PM_{10} emissions which eventually led to a PM_{10} exceedance at the Toll PM_{10} monitor on August 6, 2021, and at the Reno4 and Sparks PM_{10} monitor on August 7, 2021. The 2021 Dixie/Antelope Fire EE Demonstration supports the criteria for an exceptional event detailed in the 2016 Exceptional Events Rule. Specifically, the documentation used the following evidence to demonstrate the exceptional event:

- ambient air monitoring data
- statistical analyses of the monitoring data compared to historical concentrations
- analyses of wildfire smoke emissions
- satellite imagery (visible and detected smoke)
- narratives from the National Oceanic and Atmospheric Administration and National Weather Service (Reno)
- HYSPLIT trajectory analyses
- social and traditional media posts

This EE Demonstration clearly demonstrates justification for exclusion of data for August 6 and 7,2021, due to an exceptional event under 40 CFR 50.14(c)(3)(iv). The 2021 Dixie/Antelope Fire EE Demonstration has provided evidence that:

- 1. Emissions from a wildfire event caused PM₁₀ exceedances at the Toll, Reno4, and Sparks monitor;
- 2. The event affected air quality in such a way that there exists a clear causal relationship between the event and the exceedances on August 6-7, 2021;
- 3. Event-influenced concentrations were unusual and above normal historical concentrations:
- 4. The event was a wildfire and a natural event predominately occurring on wildland; and
- 5. The event was not reasonably controllable or preventable.

The AQMD recommends that EPA Region 9 concur with the 2021 Dixie/Antelope Fire EE Demonstration and exclude data from the Toll PM₁₀ monitor on August 6, 2021, and the Reno4 and Sparks PM₁₀ monitors on August 7, 2021, from comparison to the NAAQS.



Please contact Matt McCarthy for questions or comments at mmccarthy@nnph.org

Appendix A

Public Comment Plan



Public Comment Period

This Exceptional Event Demonstration was available for public inspection from October 26 to November 26, 2023 at the AQMD website (OurCleanAir.com). AQMD issued a press release on October 26, 2023 to inform the public of the comment period. The press release provides a web link to the draft demonstration and explains how to submit written comments during the comment period. A hardcopy of the plan was also available at the AQMD office. All comments received during this inspection period are outlined below, along with the press release.



Appendix B

Exceptional Event Initial Notification



Initial Notification of Potential Exceptional Event Information Summary for PM₁₀

Submitting Agency: Washoe County Health District Air Quality Management Division

Agency Contact: Daniel Inouye, Branch Chief

<u>Date Submitted</u>: July 1, 2022 <u>Applicable NAAQS</u>: 1987 PM₁₀ <u>Affected Regulatory Decision</u>¹: None

Area Name/Designation Status: Truckee Meadows Hydrographic Basin 87 PM₁₀ Maintenance Area

Design Value Period: 2019-2021



Table A(1): Information specific to each flagged monitor day that may be submitted to EPA in support of the affected regulatory decision listed above

Date(s) of	Type of Event (high wind, volcano, wildfires/prescribed		Monitor AQS IDs (and		24-hour average Exceedance Concentration	Notes (e.g. event name, links to other
Event(s)	fire, other ²)	AQS Flags	POCs)	Monitor Names	$(\mu g/m^3)$	events)
07/24/2021	Wildfires	IT	32-031-1007-81102-1	Spanish Springs	173	
07/25/2021	Wildfires	IT	32-031-1007-81102-1	Spanish Springs	187	
			32-031-1007-81102-1	Spanish Springs	186	
07/26/2021	Wildfires	IT	32-031-1005-81102-4	Sparks	174	
			32-031-0031-81102-2	Reno4	171	
08/06/2021	Wildfires	IT	32-031-0025-81102-2	Toll	156	
			32-031-0031-81102-2	Reno4	198	
08/07/2021	Wildfires	IT	32-031-1005-81102-4	Sparks	163	
			32-031-1007-81102-1	Spanish Springs	162	
08/16/2021	Wildfires	IT	32-031-1007-81102-1	Spanish Springs	197	
08/17/2021	Wildfires	IT	32-031-0025-81102-2	Toll	161	
08/20/2021	Wildfires	IT	32-031-0025-81102-2	Toll	176	
			32-031-0025-81102-2	Toll	204	
08/21/2021	Wildfires	IT	32-031-0031-81102-2	Reno4	200	
08/21/2021		11	32-031-1007-81102-1	Spanish Springs	195	
			32-031-1005-81102-4	Sparks	190	
09/22/2021	Wildfires	IT	32-031-0025-81102-2	Toll	261	
08/22/2021	whalifes	11	32-031-0031-81102-2	Reno4	210	
			32-031-0025-81102-2	Toll	319	
08/23/2021	Wildfires	IT	32-031-0031-81102-2	Reno4	304	
08/23/2021	wildlires	11	32-031-1005-81102-4	Sparks	214	
			32-031-1007-81102-1	Spanish Springs	187	
			32-031-0025-81102-2	Toll	284	
08/24/2021	Wildfires	IT	32-031-0031-81102-2	Reno4	233	
			32-031-1005-81102-4	Sparks	168	
09/25/2021	W:146:	IT	32-031-0025-81102-2	Toll	211	
08/25/2021	Wildfires	IT	32-031-0031-81102-2	Reno4	164	
08/26/2021	Wildfires	IT	32-031-0025-81102-2	Toll	174	

 $^{^{1}}$ designation, classification, attainment determination, attainment date extension, or finding of SIP inadequacy leading to SIP call 2 Provide additional information for types of event described as "other"

Table B(1): Violating Monitors Information

	Design Value (without EPA concurrence	
	on any of the events listed in table A	Design Value (with EPA concurrence on
Monitor (AQS ID and POC)	above)	all events listed in table A above)
32-031-1007-81102-1	4.0 expected exceedances	
32-031-0025-81102-2	4.0 expected exceedances	1.7 averaged averaged anges
32-031-1005-81102-4	2.7 expected exceedances	1.7 expected exceedances
32-031-0031-81102-2	2.7 expected exceedances	

Table C(1): Summary of Maximum Design Value (DV) Monitor Information

	Design Value	Design Value Monitor (AQS ID and POC)	Comment(s)
Maximum DV monitor (AQS ID and POC) without EPA concurrence on any of the events listed in table A above	4.0 expected exceedances 4.0 expected exceedances	32-031-1007-81102-1 32-031-0025-81102-2	Includes exceptional event data from 2020 that has not been concurred.
Maximum DV monitor (AQS ID and POC) with EPA concurrence on all events listed in table A above	1.7 expected exceedances	32-031-1007-81102-1	Includes exceptional event data from 2020 that has not been concurred.

Table D(1): List of any monitors (AQS ID and POC) within planning area with invalid design values (e.g. due to data incompleteness)

Monitor (AQS ID and POC)	Comment

Appendix C

2021 Data Certification Letter





April 26, 2022

Gwen Yoshimura Manager, Air Quality Analysis Office U.S. EPA, Region 9 75 Hawthorne Street, Mail Stop AIR-7 San Francisco, CA 94105

Re: CY2021 Ambient Air Monitoring Data Certification

Dear Ms. Yoshimura:

Attached please find a copy of the Washoe County Health District, Air Quality Management Division's (AQMD) AQS AMP600 Data Certification Report and AMP450NC Quick Look summary report for ambient air monitoring data for all State and Local Air Monitoring Stations (SLAMS) and Special Purpose Monitors (SPMs) which meet criteria in 40 CFR 58 Appendix A operated from January 1 to December 31, 2021. Included is data from Federal Reference Method (FRM) and Federal Equivalent Method (FEM) monitors for CO, NO₂, ozone, PM₁₀, PM_{10-2.5}, PM_{2.5}, and SO₂ (hourly and 5-minute average data).

This letter certifies that the ambient concentration data and the quality assurance data are completely submitted to AQS, and the ambient data are accurate to the best of my knowledge taking into consideration the quality assurance findings.

Please contact Mr. Daniel Timmons or me at (775) 784-7200 with any questions or concerns.

Sincerely,

Francisco Vega, P.E., MBA

Clavesa

Director, Air Quality Management Division

Washoe County Health District

Attachments

cc: Fletcher Clover, Air Quality Analysis Office, U.S. EPA, Region 9



User ID: BAA QUICKLOOK ALL PARAMETERS

port Request ID:	2005956			Repo	ort Code:	AME	450NC						Apr. 4, 20
					GEO	GRAPHIC	SELECT	IONS					
	Tribal											EPA	
	Code	State	County	Site P	arameter	POC	City	AQCR	UAR	CBSA	CSA	Region	
		32	031		86101								
		32	031		42401	2							
PROTO	OCOL SELECTIONS	1			AGENC	Y SELE	CTIONS						
Parameter				Washoo C	County Dis			lenartmer					
Classification	Parameter Me	thod	Duration	washoe c	Ouncy Dis	CIICC	nearch .	Depar chier	10			1 6	
ALL				_									
CI	ELECTED OPTIONS									SORT C	DDED		
SE	EDECIED OF FIONS	'								JORT	KDEK		SCR GROUP SELECTIONS
Option Type				Option Va	alue			Order		Co	lumn		Washoe Co, NV
EVENTS PROCESS		EXC	CLUDE REG	IONALLY C	ONCURRED I	EVENTS		1		STAT	E_CODE		
AGENCY ROLE				PQAO				2		COUN'	TY_CODE		
MERGE PDF FIL	ES			YES				3		si	TE_ID		
							,	4		PARAME	TER_COD	Ε	
								5		1	POC		
					6						ATES		
								7		ED	T_ID		
D # TITL	CDITTEDIA		\neg										
DATE	CRITERIA											APPLICABLE	E STANDARDS
Start Date	End Date	9										Standard D	escription
2021	2021		_									CO 8-hc	our 1971
													onth 2009
											Lead		10 Surrogate 2009
													terly 1978 ual 1971
													uai 1971 hour 2015
													hour 2006
													hour 2012
												SO2 1-h	our 2010

	EXCEPTIONAL DATA TYPES
EDT	DESCRIPTION
0	NO EVENTS
1	EVENTS EXCLUDED
2	EVENTS INCLUDED
5	EVENTS WITH CONCURRENCE EXCLUDED

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY AIR QUALITY SYSTEM

QUICKLOOK ALL PARAMETERS

2nd Max 3rd Max 4th Max Arith. Cert& 円 1st Max Value Value Value Mean Value POAO Year Meth Duration Eval Parameter Unit Site ID: 32-031-0025 City: Reno County: Washoe Address: 684A STATE ROUTE 341, RENO NV 89521 86101 PM10-2.5 - Local Conditions Micrograms/cubic meter 1 1138 2021 185 8524 881.0 602.0 586.0 563.0 13.46 1 HOUR (LC) Site ID: 32-031-0031 City: Reno County: Washoe Address: 1260-A Stewart St. Sulfur dioxide Parts per billion 8.8 .25 5 MINUTE 42401 2 1138 2021 600 98036 7.1 86101 PM10-2.5 - Local Conditions Micrograms/cubic meter 1 1138 2021 000 118 56.1 51.5 43.1 37.0 14.27 24 HOUR PM10-2.5 - Local Conditions Micrograms/cubic meter 2 1138 2021 185 8581 488.0 434.0 387.0 311.0 14.99 1 HOUR 86101 (LC) Site ID: 32-031-1005 County: Washoe Address: 750 4TH ST, SPARKS, NV 89431 City: Sparks 86101 PM10-2.5 - Local Conditions Micrograms/cubic meter 1 1138 2021 185 8592 425.0 354.0 330.0 305.0 14.58 1 HOUR (LC) Site ID: 32-031-1007 City: Sparks County: Washoe Address: 7200 Pyramid Hwy, Sparks, NV, 89441 86101 PM10-2.5 - Local Conditions Micrograms/cubic meter 1 1138 2021 185 709.0 707.0 495.0 370.0 9.74 1 HOUR 8618 (LC)

Note: The \star indicates that the mean does not satisfy summary criteria.

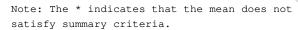
Page 2 of 5

Apr. 4, 2022

QUICKLOOK ALL PARAMETERS

METHODS USED IN THIS REPORT

PARAMETER	METHOD CODE	COLLECTION METHOD	ANALYSIS METHOD
42401	600	Instrumental	Ultraviolet Fluorescence API 100 EU
86101	000	MULTIPLE METHODS	MULTIPLE METHODS
86101	185	Met One BAM-1020 System	Paired Beta Difference



Page 3 of 5

Apr. 4, 2022

QUICKLOOK ALL PARAMETERS

PQAOS USED IN THIS REPORT

PQAO	AGENCY DESCRIPTION	
1138	Washoe County District Health Department	

Note: The * indicates that the mean does not satisfy summary criteria.

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Apr. 4, 2022

QUICKLOOK ALL PARAMETERS

Apr. 4, 2022

CERTIFICATION EVALUATION AND CONCURRENCE FLAG MEANINGS

FLAG	MEANING
M	The monitoring organization has revised data from this monitor since the
	most recent certification letter received from the state.
N	The certifying agency has submitted the certification letter and required
	summary reports, but the certifying agency and/or EPA has determined
	that issues regarding the quality of the ambient concentration data cannot
	be resolved due to data completeness, the lack of performed quality
	assurance checks or the results of uncertainty statistics shown in the
	AMP255 report or the certification and quality assurance report.
S	The certifying agency has submitted the certification letter and required
	summary reports. A value of "S" conveys no Regional assessment regarding
	data quality per se. This flag will remain until the Region provides an "N" or
	"Y" concurrence flag.
U	Uncertified. The certifying agency did not submit a required certification
	letter and summary reports for this monitor even though the due date has
	passed, or the state's certification letter specifically did not apply the
	certification to this monitor.
X	Certification is not required by 40 CFR 58.15 and no conditions apply to be
	the basis for assigning another flag value
Y	The certifying agency has submitted a certification letter, and EPA has no
	unresolved reservations about data quality (after reviewing the letter, the
	attached summary reports, the amount of quality assurance data
	submitted to AQS, the quality statistics, and the highest reported
	concentrations).

Note: The $\mbox{\scriptsize \star}$ indicates that the mean does not satisfy summary criteria.

Page 5 of 5

User ID: BAA

CERTIFICATION EVALUATION AND CONCURRENCE

Report Request ID: 2014498 Report Code: AMP600 Apr. 26, 2022

GEOGRAPHIC SELECTIONS

Tribal EPA

Code State County Site Parameter POC City AQCR UAR CBSA CSA Region

32

PROTOCOL SELECTIONS

AGENCY SELECTIONS

Parameter

Washoe County District Health Department Classification Parameter Method Duration

CRITERIA

SELECTED OPTIONS

Option Value Option Type

MERGE PDF FILES YES

AGENCY ROLE CERTIFYING

DATE CRITERIA

End Date Start Date

2021 2021

Data Evaluation and Concurrence Report Summary

Certification Year: 2021

Certifying Agency (CA): Washoe County District Health Department (1138)

Pollutants in Report:		Monitors	Monitors Recommer	nded for Monitors NOT Recommended
Parameter Name	Code	Evaluated	Concurrence by AQ	for Concurrence by AQS
Carbon monoxide	42101	2	2	0
Nitrogen dioxide (NO2)	42602	1	1	0
Ozone	44201	7	7	0
PM10 Total 0-10um STP	81102	4	4	0
PM2.5 - Local Conditions	88101	5	5	0
Sulfur dioxide	42401	1	1	0

PQAOs in Report:

PQAO Name PQAO Code TSA Date

Washoe County District Health Department 1138 08/15/19

Summary of 'N' flags for all pollutants: AQS Cert. Agency
Parameter Recommended Recommended

PQAO Code AQS Site-ID POC Flag Flag Reason for AQS Recommendation

traviola

Signature of Monitoring Organization Representative:

Certifying Year 2021

Certifying Agency Code Washoe County District Health Department (1138)

Parameter Carbon monoxide (42101) (ppm)

PQAO Name Washoe County District Health Department (1138)

QAPP Approval Date 12/12/2019

NPAP Audit Summary: Number of Passed Audits NPAP Bias Criteria Met

2.84708 Y

Routine Data					One Point	Quality C	Check	Anı	nual PE		NPAP	Concur. Flag						
AQS Site ID	POC Monitor Type	Mean	Min	Max	Exceed. Count		Perc. Comp.	Precision	Bias Co	omplete	Bias	Complete		PQAO Level Criteria	QAPP Appr.	Aqs Rec Flag	CA Rec	c Epa Concur
32-031-0	031 1 SLAMS	0.274	0.032	2.437	0	0	97	2.66	+/-2.11	100	- 0.04	100	2.85	Y	Υ	Υ	Y	S
32-031-1	005 1 SLAMS	0.387	0.000	2.200	0	0	99	1.08	+/-0.61	100	1.94	100		Υ	Υ	Υ	Υ	s

Certifying Year 2021

Certifying Agency Code Washoe County District Health Department (1138)

Parameter Nitrogen dioxide (NO2) (42602) (ppb)

PQAO Name Washoe County District Health Department (1138)

QAPP Approval Date 12/12/2019

NPAP Audit Summary: Number of Passed Audits NPAP Bias Criteria Met

0

8.18765 Y

Routine Data				One Point	Quality C	heck	An	nual PE	NPAP			Co	oncur. Flag						
AQS Site		POC Monitor Type	Mean	Min	Max	Exceed. Count	Outlier Count	Perc. Comp.	Precision	Bias Co	mplete	Bias	Complete	Bias	PQAO Leve Criteria	QAPP Appr.	Aqs Rec Flag	CA Re	Epa Concur
32-0	031-0031	1 1 SLAMS	11.8	0.1	54.6		0	97	4.08	+/-3.40	100	- 1.60	100	8.19	Y	Υ	Υ	Y	S

Certifying Year 2021

Certifying Agency Code Washoe County District Health Department (1138)

Parameter Ozone (44201) (ppm)

PQAO Name Washoe County District Health Department (1138)

QAPP Approval Date 12/12/2019

NPAP Audit Summary: Number of Passed Audits NPAP Bias Criteria Met

3.05318 Y

			Rou	tine Data					On	e Point	Quality	Check	An	nua	l PE		NPAP		Co	ncur. F	lag
AQS Site ID	POO	C Monitor Type	Mean	Min	Max	Exceed. Count		Perc. Comp.	Pre	ecision	Bias C	complete	Bias	Со	mplete	Bias	PQAO Level Criteria	QAPP Appr.	Aqs Rec Flag	CA Re Flag	c Epa Concur
32-031-00	020 1	SLAMS	0.052	0.006	0.102	0	0	99		1.98	+/-1.65	100	2.96		100		Y	Υ	Υ	Y	S
32-031-00	025 1	SLAMS	0.051	0.013	0.096	0	0	99		1.77	+/-1.23	100	0.25	Ш	100		Υ	Υ	Υ	Υ	s
32-031-00	031 1	SLAMS	0.051	0.009	0.099	0	0	96		1.61	+/-1.65	100	1.63		100	3.05	Υ	Υ	Υ	Υ	s
32-031-10	005 1	SLAMS	0.051	0.015	0.100	0	0	99		1.62	+/-1.28	100	- 0.25		100		Υ	Υ	Υ	Υ	s
32-031-10	007 1	SLAMS	0.049	0.017	0.100	0	0	99		1.72	+/-1.57	100	0.71		100		Υ	Υ	Υ	Υ	s
32-031-20	002 1	SLAMS	0.053	0.029	0.093	0	0	95		5.01	+/-3.55	100	3.29		100		Υ	Υ	Υ	Υ	s
32-031-20	009 1	SLAMS	0.053	0.022	0.096	0	0	98		2.01	+/-1.57	100	1.31		100		Y	Υ	Y	Y	s

Certifying Year 2021

Certifying Agency Code Washoe County District Health Department (1138)

Parameter Sulfur dioxide (42401) (ppb)

PQAO Name Washoe County District Health Department (1138)

QAPP Approval Date 12/12/2019

NPAP Audit Summary: Number of Passed Audits NPAP Bias Criteria Met

0

2.92973 Y

		Rou	ıtine Data					One Point	Quality C	heck	Ann	ual PE		NPAP		Co	ncur. F	ag
AQS Site ID	POC Monitor Type	Mean	Min	Max	Exceed. Count	Outlier Count	Perc. Comp.	Precision	Bias Co	mplete	Bias C	Complete	Bias	PQAO Level Criteria	QAPP Appr.	Aqs Rec Flag	CA Rec	c Epa Concur
32-031-00	31 1 SLAMS	0.2	- 0.6	3.6		0	97	4.06	+/-3.20	100	- 3.74	100	2.93	Y	Υ	Υ	Υ	S

Data Evaluation and Concurrence Report for Particulate Matter

Certifying Year:2021

Certifying Agency: Washoe County District Health Department (1138)

Parameter: PM10 Total 0-10um STP (81102) CONTINUOUS
PQAO Name: Washoe County District Health Department (1138)
Quality Assurance Project Plan Approval Date: 12/12/2019

Monitors Summaries

	Routine Data (ug/m3)							Flow Ra	ate Verification	Flow	Rate Audit		Coll6	cation renc	e Flag
AQS Site ID F	POC	Monitor <u>Type</u>	r <u>Mean</u>	<u>Min</u>	Exceed Max Count		, -	<u>Bias</u>	% Complete	<u>Bias</u>	% Complete				Rec EPA g Concur
32-031-0025	2	SLAMS	28.45	-4.0	985.0	0	97	+/-0.48	100	+0.16	100	Y	Υ	Υ	S
32-031-0031	2	SLAMS	31.36	-1.0	597.0	0	98	+/-0.44	100	+0.41	100	Y	Υ	Υ	S
32-031-1005	4	SLAMS	30.48	-5.0	552.0	0	98	+/-0.44	100	+0.17	100	Υ	Υ	Υ	S
32-031-1007	1	SLAMS	24.53	-2.0	985.0	0	98	+/-0.69	100	+0.52	100	Υ	Υ	Υ	S

Parameter: PM2.5 - Local Conditions (88101)

PQAO Name: Washoe County District Health Department (1138)

Quality Assurance Project Plan Approval Date:

12/12/2019

Colloca	tion Su	ummar	У					PEP Su	ımmary					
		# Sites	# Sites	%	CV		Criteria	#	# Audited	# PEP	# PEP	%		Criteria
<u>Method</u>	# Sites	Req	Collocated	<u>Collocated</u>	<u>Est</u>	CV UB	Met?	Method	<u>Methods</u>	Required	Submitted	<u>Complete</u>	<u>Bias</u>	Met?
170	4	1	1	100	10.03	11.08	Υ	1	1	5	3	60	-3.18	Υ

Monitors Summaries

	Routine Data (ug/m3)							O	Flow	Rate Audit	it Collocation			PEP		Con	ncurrence Flag		
AQS Site ID	POC	<u>Metho</u>	Monito d <u>Type</u>		<u>Min</u>		Exceed. Count		% Complete	<u>Bias</u>	% Complete	<u>CV</u>	% Complete	PQAO Crit. Met	PQAO		AQS Re <u>Flag</u>	c CA Rec Flag	c EPA Concur
32-031-0025	1	170	SLAMS	11.17	-8.0	375.0		0	98	+0.57	7 100			Υ	Υ	Υ	Υ	Υ	S
32-031-0031	1	545/ 142	SLAMS	12.16	.6	218.9		0	97	-0.95	100			Υ	Y	Υ	Υ	Υ	S
32-031-0031	2	170	SLAMS	12.59	-7.0	312.0		0	98	-0.58	100	11.0	8 100	Υ	Υ	Y	Υ	Υ	S
32-031-1005	1	170	SLAMS	12.10	-7.0	278.0		0	99	-0.43	100			Υ	Υ	Υ	Υ	Υ	S
32-031-1007	1	170	SLAMS	11.59	-3.0	364.0		0	99	+0.29	100			Υ	Υ	Υ	Υ	Υ	s



Appendix D

AQS Report Showing RT Flags Applied



User ID: BMCMULLEN RAW DATA QUALIFIER REPORT

Report Request ID: 2107458 Report Code: May. 22, 2023 AMP360

GEOGRAPHIC SELECTIONS

Tribal EPA

Code State County Site Parameter POC City AQCR UAR CBSA CSA Region

32 031

PROTOCOL SELECTIONS

AGENCY SELECTIONS

Parameter

Washoe County District Health Department Parameter Method Duration Classification

CRITERIA 81102

SELECTED OPTIONS

Option Type Option Value

MERGE PDF FILES YES

AGENCY ROLE PQAO

CONCURRENCE STATUS All Data (Concurred and Non-concurred) QUALIFIER TYPES REQUEST EXCLUSION (EVENT) QUALIFIERS ONLY

QUALIFIER COUNTS BY MONITOR YES

RT - Wildfire-U. S. (REQEXC) QUALIFIER CODE

DATE CRITERIA

End Date Start Date

2021 08 06 2021 08 07 Washoe Co, NV

Air Quality System

Raw Data Qualifier Report (v 1.1)

Report Date: May. 22, 2023

Parameter: PM10 Total 0-10um STP (81102)

Monitor Key /	Sample	Qual	ifier	Action		Concurrence
Site Address Sample Dat			· · · · · · · · · · · · · · · · · · ·	<u>Date</u>	NAAQS Standard	Ind Date
32-031-0025-81102-2 2021-08-06	00:00 21	RT	Wildfire-U. S.	2021-11-22		
684A STATE ROUTE 341,	Event:		Dixie and Antelope Wildfires	2023-05-22		
RENO NV 89521						
32-031-0025-81102-2 2021-08-06	01:00 48	RT	Wildfire-U. S.	2021-11-22	\cap \cup	
684A STATE ROUTE 341,	Event:		Dixie and Antelope Wildfires	2023-05-22		
RENO NV 89521						
32-031-0025-81102-2 2021-08-06	02:00 90	RT	Wildfire-U. S.	2021-11-22		
684A STATE ROUTE 341,	Event:		Dixie and Antelope Wildfires	2023-05-22		
RENO NV 89521			X			
32-031-0025-81102-2 2021-08-06		RT	Wildfire-U. S.	2021-11-22		
684A STATE ROUTE 341,	Event:		Dixie and Antelope Wildfires	2023-05-22		
RENO NV 89521			1° 0°			
32-031-0025-81102-2 2021-08-06	04:00 316	RT	Wildfire-U. S.	2021-11-22		
684A STATE ROUTE 341,	Event:		Dixie and Antelope Wildfires	2023-05-22		
RENO NV 89521						
32-031-0025-81102-2 2021-08-06		RT	Wildfire-U. S.	2021-11-22		
684A STATE ROUTE 341,	Event:		Dixie and Antelope Wildfires	2023-05-22		
RENO NV 89521						
32-031-0025-81102-2 2021-08-06		RT		2021-11-22		
684A STATE ROUTE 341,	Event:		Dixie and Antelope Wildfires	2023-05-22		
RENO NV 89521						
32-031-0025-81102-2 2021-08-06		RT	Wildfire-U. S.	2021-11-22		
684A STATE ROUTE 341,	Event:		Dixie and Antelope Wildfires	2023-05-22		
RENO NV 89521						
32-031-0025-81102-2 2021-08-06		RT	Wildfire-U. S.	2021-11-22		
684A STATE ROUTE 341,	Event:		Dixie and Antelope Wildfires	2023-05-22		
RENO NV 89521						
32-031-0025-81102-2 2021-08-06		RT	Wildfire-U. S.	2021-11-22		
684A STATE ROUTE 341,	Event:		Dixie and Antelope Wildfires	2023-05-22		
RENO NV 89521						
32-031-0025-81102-2 2021-08-06		RT	Wildfire-U. S.	2021-11-22		
684A STATE ROUTE 341,	Event:		Dixie and Antelope Wildfires	2023-05-22		
RENO NV 89521						

Air Quality System

Report Date: May. 22, 2023

Raw Data Qualifier Report (v 1.1)

Parameter: PM10 Total 0-10um STP (81102)

Monitor Key /	Sample	:		Action		Concurrence
Site Address Sample Dat	<u>e-Time</u> <u>Value</u>	Code	Description	<u>Date</u>	NAAQS Standard	Ind Date
32-031-0025-81102-2 2021-08-06	11:00 205	RT	Wildfire-U. S.	2021-11-22		
684A STATE ROUTE 341,	Event:		Dixie and Antelope Wildfires	2023-05-22		
RENO NV 89521						
32-031-0025-81102-2 2021-08-06	12:00 168	RT	Wildfire-U. S.	2021-11-22	\cap \cup	
684A STATE ROUTE 341,	Event:		Dixie and Antelope Wildfires	2023-05-22		
RENO NV 89521						
32-031-0025-81102-2 2021-08-06	13:00 116	RT	Wildfire-U. S.	2021-11-22		
684A STATE ROUTE 341,	Event:		Dixie and Antelope Wildfires	2023-05-22		
RENO NV 89521			X			
32-031-0025-81102-2 2021-08-06	14:00 125	RT	Wildfire-U. S.	2021-11-22		
684A STATE ROUTE 341,	Event:		Dixie and Antelope Wildfires	2023-05-22		
RENO NV 89521				·		
32-031-0025-81102-2 2021-08-06	15:00 153	RT	Wildfire-U. S.	2021-11-22		
684A STATE ROUTE 341,	Event:		Dixie and Antelope Wildfires	2023-05-22		
RENO NV 89521						
32-031-0025-81102-2 2021-08-06	16:00 167	RT	Wildfire-U. S.	2021-11-22		
684A STATE ROUTE 341,	Event:		Dixie and Antelope Wildfires	2023-05-22		
RENO NV 89521						
32-031-0025-81102-2 2021-08-06	17:00 151	RT	Wildfire-U. S.	2021-11-22		
684A STATE ROUTE 341,	Event:		Dixie and Antelope Wildfires	2023-05-22		
RENO NV 89521						
32-031-0025-81102-2 2021-08-06	18:00 153	RT	Wildfire-U. S.	2021-11-22		
684A STATE ROUTE 341,	Event:		Dixie and Antelope Wildfires	2023-05-22		
RENO NV 89521						
32-031-0025-81102-2 2021-08-06	19:00 124	RT	Wildfire-U. S.	2021-11-22		
684A STATE ROUTE 341,	Event:		Dixie and Antelope Wildfires	2023-05-22		
RENO NV 89521						
32-031-0025-81102-2 2021-08-06	20:00 94	RT	Wildfire-U. S.	2021-11-22		
684A STATE ROUTE 341,	Event:		Dixie and Antelope Wildfires	2023-05-22		
RENO NV 89521						
32-031-0025-81102-2 2021-08-06	21:00 83	RT	Wildfire-U. S.	2021-11-22		
684A STATE ROUTE 341,	Event:		Dixie and Antelope Wildfires	2023-05-22		
RENO NV 89521						

Air Quality System

Raw Data Qualifier Report (v 1.1)

Parameter: PM10 Total 0-10um STP (81102)

Standard Units: Micrograms/cubic meter (25 C) (001)

Monitor Key /	Sample)		Action		Concurrence
Site Address Sample Dat	e-Time Value	Code	Description	<u>Date</u>	NAAQS Standard	Ind Date
32-031-0025-81102-2 2021-08-06	22:00 81	RT	Wildfire-U. S.	2021-11-22		
684A STATE ROUTE 341,	Event:		Dixie and Antelope Wildfires	2023-05-22		
RENO NV 89521						
32-031-0025-81102-2 2021-08-06	23:00 93	RT	Wildfire-U. S.	2021-11-22		
684A STATE ROUTE 341,	Event:		Dixie and Antelope Wildfires	2023-05-22		
RENO NV 89521						

Report Date: May. 22, 2023

Count: 24

Monitor Qualifier Counts: RT Wildfire-U. S.

Monitor Key /	Sample	e Qual	ifier	Action	Concurrence
Site Address Sample Dat	e-Time Value	Code	<u>Description</u>	Date NAAQS Standard	Ind Date
32-031-0031-81102-2 2021-08-07	00:00 243	RT	Wildfire-U. S.	2021-11-17	
1260-A Stewart St.	Event:		Dixie and Antelope Wildfires	2023-05-22	
32-031-0031-81102-2 2021-08-07	01:00 259	RT	Wildfire-U. S.	2021-11-17	
1260-A Stewart St.	Event:		Dixie and Antelope Wildfires	2023-05-22	
32-031-0031-81102-2 2021-08-07	02:00 272	RT	Wildfire-U. S.	2021-11-17	
1260-A Stewart St.	Event:		Dixie and Antelope Wildfires	2023-05-22	
32-031-0031-81102-2 2021-08-07	03:00 337	RT	Wildfire-U. S.	2021-11-17	
1260-A Stewart St.	Event:		Dixie and Antelope Wildfires	2023-05-22	
32-031-0031-81102-2 2021-08-07	04:00 275	RT	Wildfire-U. S.	2021-11-17	
1260-A Stewart St.	Event:		Dixie and Antelope Wildfires	2023-05-22	
32-031-0031-81102-2 2021-08-07	05:00 267	RT	Wildfire-U. S.	2021-11-17	
1260-A Stewart St.	Event:		Dixie and Antelope Wildfires	2023-05-22	
32-031-0031-81102-2 2021-08-07	06:00 270	RT	Wildfire-U. S.	2021-11-17	
1260-A Stewart St.	Event:		Dixie and Antelope Wildfires	2023-05-22	
32-031-0031-81102-2 2021-08-07	07:00 276	RT	Wildfire-U. S.	2021-11-17	
1260-A Stewart St.	Event:		Dixie and Antelope Wildfires	2023-05-22	
32-031-0031-81102-2 2021-08-07	08:00 265	RT	Wildfire-U. S.	2021-11-17	
1260-A Stewart St.	Event:		Dixie and Antelope Wildfires	2023-05-22	
32-031-0031-81102-2 2021-08-07	09:00 252	RT	Wildfire-U. S.	2021-11-17	
1260-A Stewart St.	Event:		Dixie and Antelope Wildfires	2023-05-22	
32-031-0031-81102-2 2021-08-07	10:00 241	RT	Wildfire-U. S.	2021-11-17	
1260-A Stewart St.	Event:		Dixie and Antelope Wildfires	2023-05-22	
32-031-0031-81102-2 2021-08-07	11:00 142	RT	Wildfire-U. S.	2021-11-17	
1260-A Stewart St.	Event:		Dixie and Antelope Wildfires	2023-05-22	

Air Quality System

Raw Data Qualifier Report (v 1.1)

Report Date: May. 22, 2023

Parameter: PM10 Total 0-10um STP (81102)

Monitor Key /	Sample			Action		Concurrence
Site Address Sample Dat	e-Time Value	Code	Description	<u>Date</u>	NAAQS Standard	Ind Date
32-031-0031-81102-2 2021-08-07	12:00 125	RT	Wildfire-U. S.	2021-11-17		
1260-A Stewart St.	Event:		Dixie and Antelope Wildfires	2023-05-22		
32-031-0031-81102-2 2021-08-07	13:00 188	RT	Wildfire-U. S.	2021-11-17		
1260-A Stewart St.	Event:		Dixie and Antelope Wildfires	2023-05-22		
32-031-0031-81102-2 2021-08-07	14:00 103	RT	Wildfire-U. S.	2021-11-17		
1260-A Stewart St.	Event:		Dixie and Antelope Wildfires	2023-05-22		
32-031-0031-81102-2 2021-08-07	15:00 102	RT	Wildfire-U. S.	2021-11-17		
1260-A Stewart St.	Event:		Dixie and Antelope Wildfires	2023-05-22		
32-031-0031-81102-2 2021-08-07	16:00 171	RT	Wildfire-U. S.	2021-11-17		
1260-A Stewart St.	Event:		Dixie and Antelope Wildfires	2023-05-22		
32-031-0031-81102-2 2021-08-07	17:00 186	RT	Wildfire-U. S.	2021-11-17		
1260-A Stewart St.	Event:		Dixie and Antelope Wildfires	2023-05-22		
32-031-0031-81102-2 2021-08-07	18:00 111	RT	Wildfire-U. S.	2021-11-17		
1260-A Stewart St.	Event:		Dixie and Antelope Wildfires	2023-05-22		
32-031-0031-81102-2 2021-08-07	19:00 132	RT	Wildfire-U. S.	2021-11-17		
1260-A Stewart St.	Event:		Dixie and Antelope Wildfires	2023-05-22		
32-031-0031-81102-2 2021-08-07	20:00 137	RT	Wildfire-U. S.	2021-11-17		
1260-A Stewart St.	Event:		Dixie and Antelope Wildfires	2023-05-22		
32-031-0031-81102-2 2021-08-07	21:00 134	RT	Wildfire-U. S.	2021-11-17		
1260-A Stewart St.	Event:		Dixie and Antelope Wildfires	2023-05-22		
32-031-0031-81102-2 2021-08-07	22:00 138	RT	Wildfire-U. S.	2021-11-17		
1260-A Stewart St.	Event:		Dixie and Antelope Wildfires	2023-05-22		
32-031-0031-81102-2 2021-08-07	23:00 145	RT	Wildfire-U. S.	2021-11-17		
1260-A Stewart St.	Event:		Dixie and Antelope Wildfires	2023-05-22		
Monitor Qualifier Co	unts: RT Wi	ldfir	e-U. S.		Co	unt: 24
Monitor Key /	Sample	Qual	ifier	Action		Concurrence
Site Address Sample Dat	e-Time Value	Code	Description	<u>Date</u>	NAAQS Standard	Ind Date
32-031-1005-81102-4 2021-08-07	00:00 129	RT	Wildfire-U. S.	2021-11-18		
750 4TH ST, SPARKS, NV	Event:		Dixie and Antelope Wildfires	2023-05-22		
89431						
32-031-1005-81102-4 2021-08-07	01:00 129	RT	Wildfire-U. S.	2021-11-18		
750 4TH ST, SPARKS, NV	Event:		Dixie and Antelope Wildfires	2023-05-22		
89431						

Air Quality System

Raw Data Qualifier Report (v 1.1)

Report Date: May. 22, 2023

Parameter: PM10 Total 0-10um STP (81102)

Monitor Key /		Sa	ample		Action		Concurrence
Site Address	Sample Date	e-Time Va	<u>lue</u> Code	Description	<u>Date</u>	NAAQS Standard	Ind Date
32-031-1005-81102-4	2021-08-07	02:00 1	.63 RT	Wildfire-U. S.	2021-11-18		
750 4TH ST, SPARKS,	NV	Event:		Dixie and Antelope Wildfires	2023-05-22		
89431							
32-031-1005-81102-4	2021-08-07	03:00 1	.55 RT	Wildfire-U. S.	2021-11-18	\cap \cup	
750 4TH ST, SPARKS,	NV	Event:		Dixie and Antelope Wildfires	2023-05-22		
89431							
32-031-1005-81102-4	2021-08-07	04:00 1	.75 RT	Wildfire-U. S.	2021-11-18		
750 4TH ST, SPARKS,	NV	Event:		Dixie and Antelope Wildfires	2023-05-22		
89431				X			
32-031-1005-81102-4	2021-08-07	05:00 1	.89 RT	Wildfire-U. S.	2021-11-18		
750 4TH ST, SPARKS,	NV	Event:		Dixie and Antelope Wildfires	2023-05-22		
89431							
32-031-1005-81102-4	2021-08-07	06:00 1	.82 RT	Wildfire-U. S.	2021-11-18		
750 4TH ST, SPARKS,	NV	Event:		Dixie and Antelope Wildfires	2023-05-22		
89431							
32-031-1005-81102-4	2021-08-07	07:00 2	34 RT	Wildfire-U. S.	2021-11-18		
750 4TH ST, SPARKS,	NV	Event:		Dixie and Antelope Wildfires	2023-05-22		
89431							
32-031-1005-81102-4		08:00 2	80 RT	Wildfire-U. S.	2021-11-18		
750 4TH ST, SPARKS,	NV	Event:		Dixie and Antelope Wildfires	2023-05-22		
89431							
32-031-1005-81102-4		09:00 2	63 RT	Wildfire-U. S.	2021-11-18		
750 4TH ST, SPARKS,	NV	Event:		Dixie and Antelope Wildfires	2023-05-22		
89431							
32-031-1005-81102-4		10:00 2	31 RT	Wildfire-U. S.	2021-11-18		
750 4TH ST, SPARKS,	NV	Event:		Dixie and Antelope Wildfires	2023-05-22		
89431							
32-031-1005-81102-4	2021-08-07	11:00 1	.44 RT	Wildfire-U. S.	2021-11-18		
750 4TH ST, SPARKS,	NV	Event:		Dixie and Antelope Wildfires	2023-05-22		
89431							
32-031-1005-81102-4		12:00 1	.20 RT	Wildfire-U. S.	2021-11-18		
750 4TH ST, SPARKS,	NV	Event:		Dixie and Antelope Wildfires	2023-05-22		
89431							

Air Quality System

Raw Data Qualifier Report (v 1.1)

Report Date: May. 22, 2023

Parameter: PM10 Total 0-10um STP (81102)

Monitor Key /		Sample		Action		Concurrence
Site Address Sam	ple Date-Time	<u>Value</u> <u>Code</u>	<u>Description</u>	<u>Date</u>	NAAQS Standard	Ind Date
32-031-1005-81102-4 202	21-08-07 13:00	95 RT	Wildfire-U. S.	2021-11-18		
750 4TH ST, SPARKS, NV	Event	:	Dixie and Antelope Wildfires	2023-05-22		
89431						
32-031-1005-81102-4 202	21-08-07 14:00	86 RT	Wildfire-U. S.	2021-11-18		
750 4TH ST, SPARKS, NV	Event	:	Dixie and Antelope Wildfires	2023-05-22		
89431						
32-031-1005-81102-4 202	1-08-07 15:00	90 RT	Wildfire-U. S.	2021-11-18		
750 4TH ST, SPARKS, NV	Event	:	Dixie and Antelope Wildfires	2023-05-22		
89431						
32-031-1005-81102-4 202	1-08-07 16:00	137 RT	Wildfire-U. S.	2021-11-18		
750 4TH ST, SPARKS, NV	Event	:	Dixie and Antelope Wildfires	2023-05-22		
89431				Y		
32-031-1005-81102-4 202	1-08-07 17:00	165 RT	Wildfire-U. S.	2021-11-18		
750 4TH ST, SPARKS, NV	Event	:	Dixie and Antelope Wildfires	2023-05-22		
89431						
32-031-1005-81102-4 202	1-08-07 18:00	104 RT	Wildfire-U. S.	2021-11-18		
750 4TH ST, SPARKS, NV	Event	:	Dixie and Antelope Wildfires	2023-05-22		
89431						
32-031-1005-81102-4 202	1-08-07 19:00	119 RT	Wildfire-U. S.	2021-11-18		
750 4TH ST, SPARKS, NV	Event	:	Dixie and Antelope Wildfires	2023-05-22		
89431						
32-031-1005-81102-4 202	21-08-07 20:00	127 RT	Wildfire-U. S.	2021-11-18		
750 4TH ST, SPARKS, NV	Event	:	Dixie and Antelope Wildfires	2023-05-22		
89431						
32-031-1005-81102-4 202	21-08-07 21:00	217 RT	Wildfire-U. S.	2021-11-18		
750 4TH ST, SPARKS, NV	Event	:	Dixie and Antelope Wildfires	2023-05-22		
89431						
32-031-1005-81102-4 202	21-08-07 22:00	202 RT	Wildfire-U. S.	2021-11-18		
750 4TH ST, SPARKS, NV	Event	:	Dixie and Antelope Wildfires	2023-05-22		
89431						
32-031-1005-81102-4 202	21-08-07 23:00	198 RT	Wildfire-U. S.	2021-11-18		
750 4TH ST, SPARKS, NV	Event	:	Dixie and Antelope Wildfires	2023-05-22		
89431						

Air Quality System

Raw Data Qualifier Report (v 1.1)

Parameter: PM10 Total 0-10um STP (81102)

Standard Units: Micrograms/cubic meter (25 C) (001)

Monitor Qualifier Counts: RT Wildfire-U. S.

Report Date: May. 22, 2023

Count: 24



United Stated Environmental Protection Agency Air Quality System

Report Date: May. 22, 2023

All Qualifiers Utilized:

QualifierQualifierCode:Qualifier Description:Count:

RT Wildfire-U. S. 72