Fireworks Exceptional Event

PM2.5 July 5, 2007 West Valley

Photo from Olympus Cove looking west 22:11 Hrs MDT, July 4, 2007

Photos Furnished by: Meteorological Solutions Inc. Open Website.

Purpose of Report

• UDAQ is flagging PM2.5 data for removal from regulatory consideration

 This is the follow-up documentation for the event that was flagged and described in AQS

Regulatory Process

- Treatment of Data Influenced by Exceptional Events is covered in 40 CFR Parts 50 and 51.
- Guidance for the regulations can be found at 72 FR 55 March 22, 2007 13560-81.

Event Description

- Date:
- Monitor:
- 24 hour Avg.:
- AQS monitor #: 49-035-3007
- Monitor Location: UTM
 - Zone 12
 - Northing
 - Easting

July 5, 2007

West Valley

50.7 μ g/m³

- 4506036
- 418241

Event Description (Cont)

- The following slides will address each of the required elements of the exceptional events regulation regarding this data point.
- A weight of evidence will be provided that concludes this data should be removed from regulatory consideration.

Event Qualifies as an Exceptional Event

- This event is a fireworks event
- It is associated with cultural tradition as stated in the guidance.
 - It involves the use of fireworks
 - Includes municipal displays on various days surrounding the 4th of July, and
 - A general use of personal ground level fireworks on various days surrounding the 4th of July.





Emissions from Fireworks Affected



Emissions from Fireworks Affected Air Quality (Cont)

- Fireworks affected air quality throughout the Wasatch Front as shown in the adjacent graph.
 - PM2.5 hourly values show sudden impact which coincides with the onset of firework displays.
 - Values peak in conjunction with large firework display commonly presented at 10:00 pm.
 - Values peak at the same time on July 3rd, 4th, and 5th, which may be due to personal ground level fireworks.

Wasatch Front PM2.5 Measured 1 Hr. Average Values July 3 to July 5, 2007

📩 🔶 Lindon 🖵 Hawthorne 📥 Ogden 🔆 Logan 🚥 PM2.5 24 Hr Avg. Std



8

Clear and Causal Relationship

Evidence that Emissions from Fireworks Impact West Valley Monitor:

- Analysis of filter chemistry reveals significant quantities elements associated with fireworks.
 - The largest (over 75 %) quantities represent the components of black powder.
 - Carbon (included in the missing mass on Teflon filter)
 - Potassium Nitrate (Salt Peter)
 - Sulfur
 - Other elements are used for coloring (e.g. calcium, etc)
 - Trace elements
 - Rarely found in air samples.

Clear and Causal Relationship Evidence that Emissions from Fireworks Impact West Valley Monitor:



10

Clear and Causal Relationship (Cont) Evidence that Emissions from Fireworks Impacted the West Valley Monitor:

Transport of emissions to the monitor comes from various firework displays throughout the Wasatch Front.

- Southerly light winds transported smoke entrained air mass from the urbanized center to the West Valley monitor.
- Valley drainage continued to move the smoke entrained air mass over the West Valley monitor on the morning of the 5th.
- Although there was no singular emission source identified, many of the firework displays were located south of the West Valley monitor.



Clear and Causal Relationship (Cont)

Regional scope of emission impact:

- Smoke from fireworks displays through out the Wasatch Front impacted many of the particulate monitors in the network.
 - PM2.5 values in the Wasatch Front were elevated from the Lindon monitor in Utah County to the Logan monitor in Cache County.
 - Visible observations of the Salt Lake Valley indicate regional impact in calm air.



Wasatch Front PM2.5 24 Hr. Measured Filter Values

Clear and Causal Relationship (Cont)

Relationship in time of emission impact:

- The impact from fireworks is observed in the evening and night of July 4th and continues into the early morning of July 5th.
- Graphs of hourly values captured at monitoring sites in the Wasatch Front verify the timing of the impact all along the Wasatch Front.



Wasatch Front PM2.5 Measured 1 Hr. Average Values

Clear and Causal Relationship (Cont)

Relationship in time of emission impact:

- In years past residual smoke from fireworks has been observed to impact the 24-hour PM2.5 filter on the following day. This is what happened on July 5th at the West Valley monitor as the filter chemistry verifies.
 - The July 5th Value from West Valley and Rose Park monitors likely includes some carryover impact from the 4th during the early morning.
 - Had the West Valley monitored on the 4th, the value likely would have been higher than what was measured on the 5th.

Wasatch Front PM2.5 24 Hr. Measured Filter Values July 2 to 6, 2007 N. Provo Tooele Spanish Fk. Lindor 📃 Highland Cottonwood Bountiful Herriman W. Valley Magna Hawthorne Rose Park 🛿 Washington Terr. 💻 Oqden ------ 24 Hr Std Harrisvill 🗖 Brigham City 🔲 i ogan



Concentration in Excess of Normal Fluctuations

Statistics from this event reveal the following:

- The geometric mean value could be used to describe a background concentration
- The geometric mean was calculated to be 8.0 μ g/m³.
 - Ten-years of historical data was used for the calculation.
 - All data points from June 1 through August 31 for the years 1998 through June 30, 2007 were included.
 - This is statistically characteristic of the summer air quality season.
- Normal historical fluctuation might be described as one geometric standard deviation above or below the geometric mean. The upper bound of this fluctuation for the West Valley monitoring site would then be 9.6 µg/m³.

Concentration in Excess of Normal Fluctuations (Cont)

The measured concentration associated with this event is shown in the graph on the next slide.

- Clearly the measured concentration exceeds 9.6 µg/m³
- From June 1998 through June of 2007, only 3 days have been above the 24-hour NAAQS, these days were influenced by fireworks. Summertime exceedances of the 24-hour NAAQS are therefore not seen in the normal variation of the West Valley data.
- In fact, it falls above the 99th percentile of all summertime values measured at this site.
- Guidance found at 72 FR 55 March 22, 2007 13560-81, says that a lesser amount of documentation would likely be necessary for "extremely high" concentrations (e.g. > 95th %ile) than for concentrations that were closer to "typical levels" (e.g. < 75th %ile.)



- For the time period surrounding this event one might have expected a background concentration (geometric mean) of 8.0 µg/m³.
 - Calculation of the geometric mean was already described in slide 15.
- This is well below the current 24-hour PM2.5 NAAQS standard.

- Measured concentration associated with the event was 50.7 µg/m³
- The difference between the measured concentration and the expected background is 42.7 µg/m³.
- This difference could be considered the amount of impact from the event.

- However, to account for typical fluctuations we must subtract a representative amount.
 - Again, this might be described by one geometric standard deviation above the mean.
 - In this case one geometric standard deviation equates to 1.5 µg/m³.
- Hence, the amount of concentration that would be attributable to the event using this approach is 41.1 μg/m³.

- Supporting evidence
- The chart on the next slide is of hourly monitoring data throughout the monitoring network.
 - Even though this data was not collected at the West Valley monitor, temporal profile is most likely very similar.
 - Expect for the dramatic peak at the end of the day the PM2.5 values were very consistent.

Wasatch Front PM2.5 Measured 1 Hr. Average Values July 3 to July 5, 2007



- A closer look at the raw data reveals that
 - Except for emissions from fireworks during the hours between 8 pm to 2 am on the 3rd, 4th, and 5th
 - Concentration values were consistently below the 20 µg/m³
 - Any hourly exception to these may indicate impact from localized use of fireworks.

Date and Time	Lindon	Hawthorne	Ogden	Logan
7/3/07 20:00	7.1	13	5.9	9.5
7/3/07 21:00	36.4	8.5	32.1	13.4
7/3/07 22:00	63.3	7.6	92.4	21.3
7/3/07 23:00	45.6	9.9	99.1	19.9
7/4/07 0:00	34.6	7.7	46.8	16.9
7/4/07 1:00	14.4	8.5	18.6	10.3
7/4/07 2:00	16	12.2	14.7	9.6
7/4/07 3:00	13.8	8.9	11.6	7.1
7/4/07 4:00	13.9	7		8.6
7/4/07 5:00	13.6	12.6	10.5	7.2
7/4/07 6:00	7	16.8	10.4	8.8
7/4/07 7:00	9.3	19.8	9.3	8.8
7/4/07 8:00	10.3	17.9	11.2	10
7/4/07 9:00	23.3	18.4	8.6	8.1
7/4/07 10:00	24.2	15.1	6.3	7.5
7/4/07 11:00	17.5	9	8	6.9
7/4/07 12:00	23.5	8.5	8.5	8.3
7/4/07 13:00	29.8	8.4	9.5	7.4
7/4/07 14:00	17.7	10.5	6.9	5.9
7/4/07 15:00	19.9	6.3	5.8	7
7/4/07 16:00	7.1	4.1	3.9	5.8
7/4/07 17:00	6.4	1	4.1	5.8
7/4/07 18:00	7.4	2.8	3.9	6.7
7/4/07 19:00	5.3	10.3	6.3	8.3
7/4/07 20:00	14.1	26.6	45.1	10.6
7/4/07 21:00	229	56.5	354.5	44.7
7/4/07 22:00	255.4	60.3	873.9	84.9
7/4/07 23:00	51.5	56.2	644.3	81.4
7/5/07 0:00	69.6	60.9	137.1	34.7
7/5/07 1:00	34.4	17.6	21.7	17.5
7/5/07 2:00	11.4	11.9	15.9	11

23

- Analysis of filter chemistry reveals that 40.2 µg/m³ is associated with chemicals commonly resulting from firework displays.
 - Carbon (included in the missing mass on Teflon filter)
 - Potassium Nitrate (Salt Peter)
 - Sulfur
- Trace elements were not included in the 40.2 µg/m³ but also account for some of the measured value that is associated with fireworks.
- Speciated data from a nearby monitor (Hawthorne) suggests that missing mass on a typical day in this season would be roughly 6.5 μ g/m³
 - Estimated as: [(Elemental Carbon) + 1.4 X (Organic Carbon)]
- Assuming a typical filter would contain roughly 6.5 µg/m³ carbon compounds one could still attribute 33.7 µg/m³ of this missing mass to the firework event.



No Exceedance or Violation "but for" the Event Summary

- Using the statistical approach discussed in slides 15-20 the concentration attributable to the event is 41.1 μg/m³.
- Using the filter analysis approach discussed in slides 24-25 the concentration attributable to the event is 33.7 µg/m³.
- In addition to other supporting evidence, both numerical approaches suggest that a sufficient concentration was attributed to the firework event and that the measured concentration would not have exceeded the PM2.5 24hour NAAQS but for the impact of emissions from fireworks!

Mitigation of Event

State Action included:

- A news release prior to July 4th that advised citizens of the potential health impacts of firework emissions.
 - Staff also participated in interviews with news media (both print and TV).
- Website that address emissions from fireworks was posted on the web before the event.
- This website covered the following items:
 - The health impacts of PM
 - The actions a person could take to minimize exposure to PM.



Public Review and Comment

- UDAQ established a 30day comment period from November 1, 2007 through December 1, 2007. No comments were received.
 - The announcement of the comment period was published in the Salt Lake Tribune and Deseret News on October 22, 2007. See the Affidavit of Publication to the right.

PUCTYMEED MAME AND AD	COP OF POBLICATION	STATE T STRATT	COPY
CUSTOMER NAME AND AD	IDRESS AC	COUNT NUMBER	DATE
UT ST DEPT OF ENV QUALITY, DIVISION OF AIR QUALITY PO BOX 144820 SALT LAKE CITY UT 84414	ENVIRO	1001399880	10/23/2007
1	NUV 9 2	1007	
	OF ENVOLUTIE	fegaral req	NOTICE NOTICE
TELEBRANE	ADORDEDA / DIVIS	To Their exception	dend (NAADA) if it one dend (NAADA) if it one del event has source t
TELEPHONE	ADORDER# / INVO	ALCE NOMBER	each that can affect all foly controllable or a ratemented to officia
8015364000	0000166276 /	NAAG2, Exce scenael picas by the Clean	eptional events are even ably and regulatory an All Act are not appropri-
sc	HEDOLE	Exceptional in that is united may de age	events more be covied a by is record a partic to a satural event. Of a 1 de event is visit
Start 10/22/2007	End 10/22/2007	faite or so d fait example, as high winds	a network even to the onetwork event to the wild firm, and terms
CUS	I, REF. NO.	from regulation for mo	tory determinations on informa stations that me
DAQPN-00	8-07	too be lings	and the being affected of
C	APTION	Protector regul opline Mett bill one dato bein fingand, dato	intervent (40 CPR Pert 30 intervent flagged deter of flogged, and 5 decor T pre covied by excent
NOTICE Feder	al regulations (40 Code of	mode evolution review end of devolution the i	the by the State for 3 percent. These same
	SIZE	• My 4, 20	mibuled to exceptional - 07 Rose Fers Manper,
77 Lines	2.00 COLUM	IN PARTY OF LAS	C7 West Vollay Masty to Reewark Dispray Et for Monitor, 44,3 Lig/m
TIMES	RATE	(id) 11.	UPa e Erste land 007 Sporat Fore Month
4		The documents	officer to reapport removie pry deferringtions will
MISC, CHARGES	AD CHARC	ES not be di	aved at the follo
		We group to be avoid the board We group to board we with Droot	ectional Events Except a Building located of l over City, in compliance all the Act, Individuals w
	TOTAL CO	ST Including our financial epimaer	arosice boxer, partice of S35-4412 (TDD S36-44
	263.72	The comment ber 1, 2007 Reat Carle en	period will close of \$400 Comments patience be accepted. Comme
AF	FIDAVIT OF PUBLICATION	may be matter	d to. Cherryl Herikas, Director
IS NEWSPAPER AGENCY CORPORATION LEGAL NOTICE - Federal regulations (40 Code of was PUBLISHED BY THE NEWSPAPER AGENCY NEWS, Dally NEWSPAPERS PRINTE IN THE ENC PUBLISHED IN SALT LAKE CITY, SALT LAKE CO	BOOKER, I CERTIFY THAT THE . EOR UT ST DEPI CORPORATION, AGENT FOR THE ILISH LANGUAGE WITH GENERA UNTY IN THE STATE OF UTAH.	ATTACHED A TOF ENV OUA SALT LAKE TRIBUNE A L CIRCULATION IN UTA	ND DESERET
PUBLISHED ON Start 10/22/2007	End 10/22/2007	NO NO	TARY PUBLIC
SIGNATURE Sunny Cray	t	Wall W	52 West 4200 South Jaruary City, Unith 84 Commission Express January 16, 2010
DATE 10/23/2007		- Elizabel	Marto
		bugalith	10 Cours

Public Review and Comment (Cont)

 To aid in the public review and comment period, a website was developed to post the justification documentation for this event.

