

UNIVERSITY OF HAWAII

Environmental Center

Office of the Director

PROPOSED AMENDMENT TO AIR POLLUTION CONTROL REGULATIONS (Ch. 43, Section 7)

Statement by
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Task Force on Air Pollution

for
Department of Health Public Hearing
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The proposed regulations for agricultural burning are an improvement over the previous version. We note with satisfaction that haze over one island alone is sufficient for declaring a non-burn day on that island, that the maximum permit period is one year, and that the responsibility for the control of burning has been fixed. There are however still too many serious shortcomings in the proposed version. In our earlier testimony on November 24, 1972 we elaborated on these and it suffices here to briefly summarize the most serious ones.

(2)(a). Application. There is still no method described as to how DOH is to decide whether to approve an application or not. Since DOH does not have the knowledge required, they must rely on the agricultural industry's analysis and it is therefore not likely that there will be any significant changes in the present burning policy because of this regulation.

(3)(aa)(1). The definition of "widespread haze," where it is to be determined and by whom need to be specified.

(3)(aa)(2). This section is based on the occurrence of two consecutive days with carbon monoxide or particulate levels above air quality standards at some unspecified location. Because there exists no definite correlation between existing monitoring stations which presumably will be used and actual pollution levels in areas affected by the burning, this section is completely unacceptable.

(4)(aa). Record Keeping. The forecast of meteorological conditions for the burn is a very important parameter in analyzing occurrences of unacceptably high concentration levels to prevent a reoccurrence. This forecast must therefore be recorded with the other prescribed pertinent data.

Since DOH has no method to critically evaluate the burning permit applications and since occurrences of haze or two consecutive periods of high CO or particulate matter levels are very rare, we can only conclude that the proposed regulations will in effect have no significant effect on the present agricultural burning

situation. In view of such investigations as the pilot study by Dr. Lehman on health effects and agricultural burning, the respiratory incidence statistics collected by Captain Ames, Commander of Barbers Point Naval Air Station, and the concentration studies by B. Root at the University of Hawaii which all indicate the agricultural burning in its present form may be detrimental to public health, we can only strongly recommend that the present regulations be regarded as very interim in nature and that the DOH and the regional office of the EPA sponsor the development of verified computer concentration simulations for all pollutants in the affected area together with continued research to establish levels which affect human health. An effective burning regulation must be built on such a sound base to effectively cope with this potentially serious health hazard to the public.