

Air Quality Management Subcommittee
Minutes from Meeting on June 16 – 17, 2005
EPA's Office of Transportation and Air Quality
Ann Arbor, MI

Attendees:

See Ann Arbor attendees.doc on the AQM Subcommittee website.

Introduction:

As Co-Chairs of the Air Quality Management (AQM) Subcommittee, Greg Green and Pat Cummins welcomed the 23 committee members, as well as those who are continuing participation from the predecessor AQM work group. They briefly reviewed the agenda which includes discussion of (1) Vision and Principles, (2) current and upcoming air quality challenges, and (3) review of available literature on suggested changes to the AQM system. These topics were to serve as background for breakout sessions. The goal was to identify 5 or 6 important topics for improving the current AQM system on which the Subcommittee can focus.

Looking ahead, it was indicated that the Subcommittee will meet on July 27 to gain agreement on the structure of discussion for the important topics to be covered over the next year. A following more comprehensive meeting is planned for the September/October time frame. It is anticipated that the Subcommittee will issue Phase 2 recommendations to the full CAAAC by mid-2006.

Vision and Principles:

Janet McCabe and John Bachmann were responsible for leading a subgroup to develop a Vision and a set of Principles for long term recommendations to be discussed by the Subcommittee. They previously reported on this effort at the AQM work group meeting in March, 2005, at which time the Vision (and its three components) was approved; the Principles were discussed but not finalized. See AQM vision&principlesfinal.pdf on the AQM Subcommittee website where the background and status of this effort are described; also included are wording changes that were made as a result of the presentation and subsequent discussion.

For many of the eleven principles, there was little discussion and they were accepted as proposed. However, a few received greater discussion. A major issue was the need for a first principle stating that the AQM system should be designed to protect public health and welfare (e.g., visibility and ecosystems). Should this be part of the Vision or a new principle? After much discussion, it was decided to introduce this concept in Principle #1 – Protect Public Health and Welfare Through a Performance-Based Approach. A complementary clarification of wording in the Vision was also made to emphasize the broad nature of “working together”.

In Principle #4 – Regional, National, and International Measures – a distinction was made between “all source sectors” and “every source sector” relative to cost effectiveness

considerations. The latter wording was adopted. Discussion of Principle #8 – Coordination with other Issues that Affect Air Quality – focused both on wording and on how closely tied air quality planning should be to other planning areas, e.g., energy, land use, transportation, others.

Appropriate wording changes were made to clarify this relationship. There was also a substantial discussion of Principle #9 – A Strong, Continuing Research Program – given its lengthy and complex wording. However, in the end it was decided that no change was necessary since the words are taken from the NAS report and provide a balance of ideas. The rule of thumb that “if the concept is okay it should be left alone” was agreed to in this case. The same rule was used for other principles for which a change was not made after discussion.

Subsequently, Janet passed out changes in the Vision and Principles #1, #4 and #8 to attendees. She requested that any exceptions be noted by the next morning; otherwise, the Vision and Principles were considered adopted to serve as a guide for the subcommittee.

Current and Upcoming Air Quality Challenges:

Michael Bradley made a presentation on current and upcoming air quality challenges for the AQS Subcommittee. His purpose was to provide background on the National Academy of Sciences (NAS) process that led to their recommendations and to draw some comparisons to the process being undertaken by the Subcommittee; see Bradley_june16.pdf on the AQM Subcommittee website which provides the presentation materials. He indicated that the NAS Committee was largely from academic interests with only a few members that had experience with regulatory programs; there were no members of the regulated community. Also, there was a constant tension between long term and short term air quality goals and the whole process took a year longer than anticipated. There was general agreement that the foundation of the air quality program is scientific and technical, so their focus was on limitations and major challenges to the air quality program. The NAS Committee identified long-term objectives for air quality management to meet future challenges and recommended general changes. They are gratified with the 38 recommendations made in response by the AQM work group and by EPA’s commitment to implement them. Particular mention was made of current AQM challenges, the major source categories that need to be addressed, and recent air quality program successes. Specific challenges ahead for the AQM Subcommittee include: (1) tracking implementation of the 38 Phase I recommendations; (2) unresolved issues from Phase I that include expansion of ambient monitoring, SIP issues, national emission control issues and conformity; and (3) remaining NAS issues which include air toxics hotspots, environmental justice, transportation / land use, agricultural practices, and climate change implications.

In follow-up discussion, the need to leverage leadership and innovation was noted in terms of local/State strategies and partnerships among government / non-government / private organizations. The AQM Subcommittee should go forward seeking high quality information, open dialogue, reality checking and progress. Tribes are implicitly included in the discussion.

The document produced by the AQM Subcommittee can serve as a reference point for new programs. There is a need to distinguish between pet projects and system changes. We need to know where the system is working and where it needs to be changed. Although most changes probably can be accommodated within the Clean Air Act, in some cases changes may be

necessary. Where changes are necessary, the AQM Subcommittee should not be an advocate, but rather a source of background documentation.

Literature Review:

Erika Sasser summarized issues and recommendations from past studies in a literature review entitled “Rethinking the U.S. Air Quality Management System”; see [sasser_june16.pdf](#) and [sasser2_june16.pdf](#) on the AQM Subcommittee website for the presentation materials. She summarized the studies and indicated how debates have changed. Three types of studies are noted: comprehensive assessments of air quality management, issue specific studies, and general critiques of environmental management. Recurring topics in the studies include roles of government agencies, economics, multi-pollutant and multi-media approaches, accountability, flexibility, risk, transport, and climate change. A significant change in more recent years is the addition of community risk across toxic pollutants. The range of studies encompassed the National Commission on Air Quality (1981) through alternative futures recently discussed by Krupnik and Shih (2004). Key questions from these studies include those concerned with: (1) progress vs. cost, (2) burden of responsibility/authority among government agencies, (3) mix of control vs. market instruments used, (4) use of innovation, flexibility, and accountability, and (5) greater integration of multi-pollutant and multi-media approaches.

Comments at the conclusion of this review included the following rhetorical questions and observations. Why were recommendations not implemented? What were the obstacles? What has worked in the past? We should use historical information to avoid unnecessary repetition. We should follow through and implement authorized programs and find ways to build on the successes we already have. We should project emissions to a future year (e.g., 2010) to see where problems are likely to be. What additional environmental challenges do we have based on where we are now? Trust is important!

Breakout Sessions and Summaries:

Participants were divided into four breakout sessions (10 to 12 individuals per session) to share ideas for improving the current Air Quality Management (AQM) system. The sessions lasted for about 2-1/2 hours. With information previously presented in the meeting, the charge was to address the second and third questions in the list of five that had been sent out prior to the meeting; see [q&a.pdf](#) on the AQM Subcommittee website. Those questions are: “Where is the current AQM system farthest from fulfilling the vision and principles?” and “What changes to the current air quality system or its components could you envision that would bring us into better alignment with the vision and principles?” The breakout groups basically used a process whereby each participant in turn identified an issue or change in the current air quality system that needs somehow to be addressed, until no additional ideas were forthcoming. An effort was then made to organize that information into issue categories or recommendations.

In a following joint session, the lead person for each of the breakout sessions provided a summary of the major topics that group discussed. Summaries from each breakout session are available as separate handouts and can be viewed on the AQM Subcommittee website.

Janet McCabe Session. Issue categories identified include those concerned with new

source review and compliance, community-related initiatives and responsibility for hot-spots, conventional SIP programs and national/regional/State responsibilities, continuing improvements in technical activities such as monitoring and emissions inventories, and innovation and incentives for enhanced control programs. See group 4_pres.pdf on the AQM Subcommittee website.

Michael Bradley Session. Big picture issues include air quality monitoring requirements, early assessment of metrics for mid-course correction, reduced urban exposures, and use of alternative policy instruments. In particular, issues were identified concerning control strategies and involvement at all governmental levels, the SIP process with assessment/implementation issues, climate change implications of the air program, and requirements for resources and organized planning. See group2.pdf on the AQM Subcommittee website.

John Bachmann Session. High priority recommendations addressed SIP planning for multiple pollutants, approaching regulations in a multi-pollutant/multi-media fashion, integrating the AQM system with other societal interests, transport and regional strategy development with closer ties to attainment SIP planning, as well as, other recommendations on uses of environmental data, local controls, reporting and education. See group1_pres.pdf on the AQM Subcommittee website.

Pat Cummins Session. The list of issues included the need for a less complex AQM system, accountability (mid-course review), ecosystem goals, market-based approaches, airshed boundaries, improved information for standards, expanded technology, multi-pollutant strategies and continued emission reductions, public education, and an overall integrated planning effort. Regional haze and RPOs is a good paradigm to follow. See group3_notes.pdf on the AQM Subcommittee website.

Discussion:

Pat Cummins then led a discussion of the breakout sessions. He indicated that we were not trying to reach final conclusions, but rather to develop common “**themes**” from findings of the four breakout groups for further discussion. Some ideas that initially developed include the following:

- Look at a more integrated multi-pollutant and multi-media air quality management and planning approach that provides consideration of and coordination with energy, land use, transportation, agriculture, forest management, etc. programs. This is not intended to be a mandate to develop linked plans, but to be recognition of the need for considering interactions with other programs during air quality planning activities. A question, though, is how to link programs to outcomes.
- There is a need for continuous improvement and feedback. We need to take a careful look at the air quality planning process. A fundamental restructuring of the SIP process and how we plan should be considered.
- Improve information/technology capability on which to base goals, plans, priorities, programs, and to characterize problems.

- Sector based strategies that are multi-pollutant based.
- Airshed based planning, including innovation and flexibility.
- There is a need to discuss control options to reduce air pollution, including such factors as market, initiative, voluntary, incentive, performance, technology forcing, cost effective, etc.

These initial ideas were followed by some hard questions. How do we frame these issues? How do we link programs/measures to outcomes? Can we come up with a process for doing this? Since this is a systems issue, how is it built into the process? It was also noted that another CAAAC group is waiting for implementation issues from the AQM Subcommittee. Relative to “accountability”, are we measuring expected results so there is time to tweak the system? Are we achieving our objectives, e.g., planned health benefits?

The rhetorical question was then asked whether we are identifying “**themes**” or just recasting issues. So the discussion was reoriented to identifying themes. Greg Green indicated that an effort will be made to develop and organize these themes for more detailed consideration by the AQM Subcommittee. Suggested “**themes**” include:

1. We need to improve the planning process which includes both multi-pollutant needs and the bullets noted above.
2. Look at innovation, alternate approaches, flexibility, and technology.
3. Accountability – define it as applied both before and after implementation strategies.
4. Develop a shared understanding of air quality problems before moving ahead.
5. Relationship building and trust are needed in the air quality management process.
6. Approach regulations in a multi-pollutant, multi-media fashion.
7. There are multiple problems for health/welfare effects; we need to drive down emissions from all source sectors continuously. This is why we need to do things in an integrated manner which will likely include CO₂ and green house gases; we can’t be blind to climate policy.
8. More simplicity and certainty for regulated sources, States, and the overall process.
9. In addition to identifying themes, we should identify a path forward. What is the process? What is the outcome? Where are we headed?

In discussion during and following the identification of themes a number of observations were made. An airshed should not be defined by artificial political boundaries. There should be a technical basis for source/impact areas. An alternate view held that this could be a problem for

entities such as tribes who have struggled to get political recognition. It was suggested that the federal government should be responsible for national rules, while it works with States on a regional basis. This leads to the possibility that the majority of rules can be nationally established by the federal government. In the end there should be a mix of federal/State/local/tribal involvement. The nature of federal support/involvement should be determined by what makes the most difference.

It was noted that there needs to be a process to define approaches to goals/analyses that gets into the planning process. An increased emphasis on understanding problems and processes is needed, e.g., see the third bullet above. Also, it was asked how politics play in implementation of programs? Where is it appropriate to try to remove this influence, e.g., setting NAAQS?

An issue was raised whether the whole group, or small teams, should be involved in discussion of themes. Small groups may be more efficient for addressing multiple issues and less demanding on individuals' time, whereas large meetings involving all participants together require organizational complexities such as public notices, etc. This issue will be addressed as the themes for consideration evolve.

Follow-up actions:

Greg indicated that the “**themes**” would be boiled down to 5 or 6 discussion areas. A discussion framework and process will be developed for the next meeting.

The next meeting will be on July 27 from 12 noon to 3pm in Washington, DC. For those who can't attend, the WebEx approach may be used; instructions will follow at a later time. Implementation of and progress reports on the 38 Tier 1 programs and the planning process for AQM Subcommittee activities will be the main topics. Everyone who comes to this meeting is urged to look at air quality management for the future and how to build trust. Attendees should try not to reflect narrow interests; biases should be left at home.

Everyone is welcome to attend future AQM Subcommittee meetings, as they are intended to reflect an open process. The wide interest and participation in this meeting, beyond the formal AQM Subcommittee members, is appreciated.