

Breakout Session on Improving the Current AQM System

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Issue Categories

- New Source Issues
- Community Related Issues
- Conventional Program Issues I & II
- Technical Issues
- Innovation Issues

New Source Issues

- New source permitting needs to be simplified and streamlined
- Reorienting NSR and NSPS to correspond to industries' modernization and capital planning cycles
- Redirect emphasis to compliance assistance from enforcement of noncompliance

Community Related Issues

- Explore “bottom-up” / community-initiated approach for identifying problems and setting priorities
- Give more credit and credence to community based, voluntary initiatives
- Accountability for reduction in exposure (or risk)
- Future challenges will increasingly involve community scale toxic hotspots and we need better tools and greater authority to address

Conventional Program Issues -- I

- Current process for SIPs is predicated on distrust; move to setting emission budgets for AQCRs, holding States responsible for managing, and keeping the SIP process as a backstop remedy, e.g., include comparable “cap” approach for industrial sectors to manage
- Feds set standards and national rules and let States manage their local air quality more flexibly -- but questions concerning consequences
- Create a system that builds a higher level of trust in regulatory decisions / more nearly emulate the NAAQS / CASAC process -- reduce incentives /gains through challenges
- Emulate regional haze program concepts in NAAQS attainment paradigm (progress, reassessment and refinement . . .)
- Nonattainment boundaries and planning needs to be resolved to reflect origins and impacts

Conventional Program Issues -- II

- Create better process for performance linkages from target to result
- Establish timeframes within which States can address problems (including multi-pollutant)
- Improve the delivery of timely implementation guidance / give more opportunities to States in the absence of guidance to work with their stakeholders in creative ways, e.g., move from oversight / gotcha to State/federal collaboration (see regional haze model with RPOs)
- Make standards reflective of future cost effective technology, with reasonable time for compliance (e.g., phasing in, declining budgets / targets)
- Be conscious of, and evaluate, multi-sector impacts to a void transferring problems between sectors (e.g., electricity / utilities)
- Nontraditional sources need to be evaluated and controlled

Technical Issues

- Monitoring disincentives – better way to more clearly and fully describe the extent of nonattainment -- separate the process of determining AQ from that of nonattainment
- Create data management systems concurrent with data collection systems – monitor / repository / software
- Change the institutional bias toward criteria pollutants in monitoring and emissions characterization and raise the level of quality and scrutiny given to toxics – more conscious inquiry into new pollutants and sources
- Continue to improve our tool box, especially including emissions inventory and emissions data
- How to design a system that achieves progress despite the absence of adequate information, e.g., provide incentives to industries to improve emission factors, use results of performance assessments to improve data

Innovation Issues

- Build more incentives into AQM for exceeding minimum performance standards, pollution prevention approaches, alternative compliance approaches, e.g., fee structures that recognize and encourage emission reductions, tax credits/incentives
- Be more responsive to different economic climates among different industries with regard to a given set of controls
- Have the courage to acknowledge and respond to the contributions of growth and individual behaviors to air quality
- Strengthen and expand government/industry research collaboration to advance control technology innovation, e.g., Freedom Car, HEI
- Land use, transportation, conformity – seek new approaches to more effectively and efficiently achieve the goals giving rise to the conformity process
- Multi-pollutant barriers – timelines, requirements, pollutants