

**NARSTO-ONE-ATMOSPHERE  
MULTIPOLLUTANT MANAGEMENT  
MINI-WORKSHOP**

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# Disclaimers

- These are my views only
- I still don't get it and freely admit I may never get it.
- It is “Multipollutant Air Quality Management” or MP AQM
- I find it difficult to assess something that is not defined
- **Hopefully, this workshop will define the “bogey” and how a science assessment can inform it without simply re-hashing old ground**

# Some Assertions (1)

- “One Atmosphere” is not the same as MP AQM
  - Whether pollutant by pollutant (PxP AQM) or MP AQM, one must understand and use one-atmosphere tools
- Accountability is not the same as MP AQM or PxP AQM
  - The former looks to past decisions, the latter look to make future decisions. The former can help make the latter better
- **Let's not use the terms interchangeably**

# Some Assertions (2)

- Science can inform policy, not make policy
  - Likewise, the NARSTO assessment must not recommend policy changes, only respond to proposed policy changes
  - ***Therefore, it would be better for the policy-makers to propose approaches they are considering and then let NARSTO answer the questions related to technical impediments***
  - ***Might CAAAC be providing this?***

# Some Assertions (3)

- If zero emissions is the only or ultimate goal of a MP AQM approach, then we don't need a science assessment
  - We need experts on technology, economics, and politics
- The Clean Air Act is not broken
  - And yet the inference is that it is and needs to be fixed
  - If it's not then what, **specifically**, needs to be changed or improved upon and how can a science assessment help?

# Some Assertions (4)

- Optimization is clearly nice to try but can rapidly become impossible to achieve
  - We already attempt to optimize to achieve a specific NAAQS (e.g., ozone)
    - Among VOC vs. NO<sub>x</sub>
    - Sources of Pollutants (e.g., mobile vs. point for NO<sub>x</sub>)
    - Location of sources (e.g., regional vs. local for NO<sub>x</sub>)
    - Cost-effectiveness (e.g., \$/ton, \$/ppb ozone)
    - PM<sub>2.5</sub> is tougher
  - **We need to keep the problem manageable by specifying the dimensions such as**
    - Which pollutants to consider
    - Which sources to consider
    - Which effects endpoints to consider
    - What time horizons to consider

# Some Assertions (5)

- There is nothing wrong with a PxP AQM approach (in disagreement w/ NRC report)
  - Complex problems need to be broken down into manageable components
  - We can recognize we are exposed to mixtures
  - We can recognize and use one-atmosphere tools
  - We can pause and consider “unintended consequences”
  - But to make decisions and progress, we need specific goals, each with their own purpose

# Some Assertions (6)

- One size does not fit all and that is why we have the Clean Air Act AQM system (CAA AQM)
- We have:
  - Air Quality Goals (e.g., NAAQS)
    - NAAQS
    - Regional Haze
  - Emission Rate-Based Performance Standards
    - NSPS, BACT, LAER, MACT, BART
    - Tier 2, Fuels
  - Emission Cap Programs, some related to NAAQS and some independent
    - Acid Rain
    - CAIR
    - CAMR
- Each has it's own goal/purpose
- What, ***specifically***, needs to be changed or improved upon and how can a science assessment help?

# What is AQM?

- It is making choices, such as:
  - Deciding what to protect
  - Deciding what level of AQ protects
  - Deciding
    - What pollutant to reduce
    - Which source(s) to control
    - How much to reduce
    - When to achieve reductions
  - Deciding what approach to use
    - Emission rates
    - Caps
  - Etc., etc., etc.
- All of these decisions are made in the context of one or more goals
- **How do these choices and goals fit into MP AQM?**

# Why is it Difficult to Change System?

- Any change is viewed as either a backing off or increased stringency
- For example:
  - harmonize schedules of Ozone, PM2.5, and Regional Haze means accelerating and relaxing; someone will object
  - CAPI, one comprehensive program; until goals change
  - SAMI socioeconomics; what gets included on the cost and benefits side of equation
- **We need to have realistic expectations**

# **Issues with CAA AQM**

- Inadequate time
- Limited resources
- The “one molecule” tests
- Focus on Big instead of growing

# **Issues with NRC Report**

- Lack of specifics on misdirection of resources
- Dissatisfaction with outcomes vs. process
- Imply Pxp AQM not good
- Expand National & Multistate Controls

# Summary

- Policymakers need to define the “bogey”
- Need to keep it manageable
- Do not need to conduct an assessment that says same thing
- MP AQM is problematic
- Accountability may fall short but worth describing

# What I Heard

- MP AQM might be:
  - Timing (do all at same time)
  - Time (I would add this)
  - Opportunity to consider MP Control Tech (not a significant opportunity for us)
  - Risk – Risk tradeoffs
  - Need more data to convince (Dislike outcomes) ??????
  - Some healthy skepticism
  - Would have been helpful to see the 33 CAAAC recommendations
- BUT, what would be new?