Air Quality Management Subcommittee

Minutes from Meeting on June 27 - 28, 2006 Ritz-Carlton Atlanta 181 Peachtree Street Atlanta, GA 30303

Attendees:

See list of participants at end of the meeting minutes.

Introduction: – Greg Green

After the introduction of attendees, Greg Green began the meeting by indicating that both Team 1 and Team 2 would summarize the recommendations that they plan to put forward. The expectation is that agreement has previously been reached on most recommendations and that any disagreements can be resolved during this meeting. As a result of subsequent discussion, Greg suggested that agreement on concepts is most important, not necessarily the specific wording of a recommendation. The discussion should then proceed to (1) the process for integrating these recommendations into a final report and (2) air quality management challenges that need to be addressed. Next steps will involve the preparation of a preliminary draft during the second half of July and discussion of that draft at the next meeting on August 1-2 in Denver, CO.

NARSTO Science Assessment: - Jim Vickery

To provide information on activities related to the AQM Subcommittee effort, Jim Vickery (EPA/ORD) made a presentation on the next NARSTO science assessment; (see The Next NARSTO Science Assessment). First, he briefly identified previous science assessments by NARSTO which is sponsored by both public (government) and private sector membership. Previous concerns have dealt with coordinating the science of ozone, particulate matter, and emissions inventories. Then, he went on to indicate that the next science assessment is to focus on the technical challenges of a multi-pollutant approach to managing air quality under an accountability framework in response to the "themes" currently being pursued in findings of the National Research Council (NRC). NARSTO is interested in receiving feedback from potential users on how to make this useful since the next step in the evolution of air quality management is likely to expand the issue of accountability, at least partially through greater emphasis on tracking indicators of effects and exposure. National and regional rules involving multi-pollutant sector approaches (e.g., CAIR, CAMR, Tier 2, heavy duty diesel, etc.) have been passed and it is important to make sure that science can measure the resulting air quality changes and to remove the influences of year-to-year meteorological variations. Also, some studies have given health signals about the impact of emission controls.

NARSTO's new effort is about making a contribution in the context of air quality management concerning manager needs for measures of progress and means to determine adjustment to existing emissions controls. The scope of the proposed NARSTO activity

is an assessment of the technical challenges (including the adequacy of the data, measurement and modeling tools) and implication of a multi-pollutant approach to managing air quality under an accountability framework. Charges for the assessment include putting means in place for a 2010 assessment of improvements in human health and ecological conditions and laying the technical foundation for a 2010 assessment of progress in air quality improvement. Principle tasks include: identify health- and exposure-related air accountability assessments needs; identify ecosystem-related air accountability assessment needs; identify air quality accountability assessment data requirements, tools, and procedures; and produce an assessment synthesis. For each task, "needs" and "products" are identified. Next steps involve selection of an assessment team and a scoping workshop by the end of September. A complete assessment is anticipated by the end of 2008.

By way of an example of the sort of work that is expected, Jim used an ongoing analysis of the NOx SIP call to assess its environmental benefits. Preliminary results indicated that there have been significant reductions in emissions. But as a result of data analysis and modeling it appears that there have been meteorological influences so that the impact on air quality is not as great as the change in emissions might indicate and that there are some areas of "disimprovement" contrary to the reduction in emissions. Input is sought from the AQM Subcommittee as to whether the planned assessment will be useful and recommendations concerning membership of the assessment team. Comments may be provided to Jim Vickery as the Public Sector Co-Chair, or to Bill Pennell, the NARSTO Management Coordinator.

Regarding questions about intermediate products that might be valuable for policy development, Jim reiterated that the study would be completed by the end of 2008; an assessment of models and monitoring capabilities and needed improvements for subjects such as the National Ambient Air Monitoring Strategy, combining data and modeling. and the availability of practical tools will be identified by that time. The importance of health aspects were of particular concern; Jim noted that, for PM fine as an example, cause/effect relationships, acute/chronic effects treated jointly, epidemiological and toxicological aspects, personal exposure, treatment of "mixtures", and source category effects all needed to be considered. In response to questions about the size of area to be considered (regional, state, multi-county?), Jim indicated that a variety of scales, including areas adjacent to highways, suburban areas and urban areas, were of interest. The improvement metrics, or a statement of how to improve metrics, is needed. Also an estimate of benefits of emissions reductions under other meteorological conditions is needed; related is worst-case versus typical years and the use of actual/real years of meteorological and emissions data. Modeling might be used to set-up airshed regions as discussed in one of the Team 1 recommendations.

Other suggestions from AQM Subcommittee members included: identification of data analysis, as well as modeling procedures; coordination with the TexAQS study and use of its outputs; establishing implications of the meteorological impacts and longer times to see the impact signal, e.g., 5 to 7 years; getting scientists and managers to better communicate; obtaining regional representation, e.g., WRAP contributions to PM

assessment; dealing with emissions inventory accuracy and quantifying relative certainty, particularly for HAPS. Next steps relative to the NARSTO effort will be connections between scientists and managers facilitated by the AQM Subcommittee and follow-up briefings by Jim in late 2006; relevant materials will be provided for circulation as they become available.

Team 1 Discussion: – Janet McCabe, Brock Nicholson, Lisa Gomez

Defining the Problem and Setting the Right Priorities. Janet McCabe began the presentation of Team 1 recommendations and indicated that the goal is to achieve consensus on the recommendations; see Team 1 Presentation. She indicated that Team 1 has a set of recommendations for each of three categories: (1) defining the problem and setting the right priorities; (2) air quality planning process; and (3) AQM coordinating function. Regarding the first category concerned with defining the problem and setting priorities, she indicated that there are multiple routes to implementing the recommendations. The recommendations address improving environmental and health data, aligning resources and regulatory focus toward the greatest health and environmental risk, and improving accountability through monitoring progress and evaluating results.

It was noted that the summary prepared by Bradley/Bachmann should serve as an umbrella statement to introduce these concepts; there is to be more discussion later on this topic. Other health-related comments include the following: (1) Air quality trends repeat on a 5 year cycle and the current tools address the wrong questions; (2) Trends tracking disease are not supported by information available from CDC, e.g. asthma is not related to a drop in ozone; (3) Nevertheless, ORD and CDC are working on tracking and may have something useful in two years; and (4) Indoor exposure also needs to be included. Words might be added to the recommendation that indicate "a goal of a health-quality, trends report related to air pollution." It was further noted that local doctors should be able to relate trends information to their area. A national protocol may be desirable to facilitate communication at local and federal levels; it is understood that there could be privacy concerns at the local level.

<u>Air Quality Planning Process</u>. Brock Nicholson continued with the second category of Team 1 recommendations which includes six broad topics.

1. Comprehensive Air Quality Management Plan (CAQMP). There is general agreement on, but there has been much discussion of, an integrated statewide plan. This is a broad overarching concept under which many of the recommendations may fit. Each State would develop an overall CAQMP that is multi-pollutant based. A technical supplement and example dates could be added, although the latter may not be realistic; it does not imply a five year requirement for NAAQS. Additional work is needed on details of how to move toward State development of CAQMPs and timing/planning cycles.

In response to a question about whether the CAQMP is on top of or replaces a SIP, it was suggested that the CAQMP would incorporate the SIP in the near term, but in the longer term the SIP could be replaced legislatively by the CAQMP. It was noted that EPA needs to work with States on the first phase; the second phase requires Clean Air Act (CAA) amendments, but there is a need to keep a regulatory forcing function consistent with integrated planning. Inclusion of climate/energy/transportation planning would be voluntary versus required. Questions were asked as to how the CAQMP would be implemented by States; goals need to be specified. There is the need to better explain the relation between CAQMP and SIPs, since SIPs are powerful and should not be arbitrarily replaced. There is also a concern about the protracted time to approve SIPs. As an example, it was noted that in California they are planning for 2008 deadlines to have a CAQMP broadly for California Air Resources Board (CARB) with an individual SIP for air quality management districts; this is being packaged to indicate that multipollutants have been considered. As a further example, it was noted that the Western Regional Air Partnership (WRAP) will be including the CARB PM2.5 analysis in its visibility plan. Nevertheless, multiple years are needed to bring planning together considering the big picture including growth, land use, etc. A template or example application might help. CAQMP is intended to be a major unifying theme, the implementation of which has details to be worked out; debate should be limited at this time. It is emphasized that CAQMPs are not to replace SIPs in the near term, but are another way to do SIPs.

- 2. Determining Meaningful Boundaries. This recommendation includes use of regional airsheds to approximate the boundaries of emission source areas that are most likely to contribute to nonattainment areas. There was general agreement on the use of boundaries which serves to emphasize regional planning.
- 3. Local Air Quality Planning. This recommendation encourages local and tribal governments to integrate air quality planning into their development plans. It is noted that working with local governments and getting them to take ownership of planning is important. This planning should be: voluntary, not mandatory; based on general agreements; provide more emphasis on EPA recognition of State planning for voluntary measures, credits, etc; based on real actions and "behavior" changes; be cultivated and energized with changes in government; and based on an understanding of economic benefit.
- 4. Continuous Improvement. This considers recommendations with several options for strengthening and enhancing various market-based programs to encourage continuous improvements. The emphasis is on "voluntary" and "incentive" aspects. Examples of under-regulated sources to which this might apply include small sources, heaters, area sources, and consumer products. The scope of the recommendation is important since control is a major capital expense for which continuous ratcheting-down may not be desirable; there is a need for balance. Details are important, though, it was noted that the "details" may take a longer time to work through, perhaps into August. It was asked if there is a goal associated with these recommendations, or whether this is improvement-for-improvement's sake. "Continuous improvement" needs balance in

timing as to when improvement occurs. At the present it appears that the context is for stationary sources and the emphasis is on the demand side, even though the intent is not to single out a specific source sector, since a concept of "one-size fits all" does not apply.

A concern is the impression that reducing pollutants is a "doctrine"; there is a need to credit good actions, so sources aren't put on the defensive. There is a need for a "zero-end-game". To put it another way, continuous improvement is a good concept, but "continuous punishment" should be avoided. On the other hand, there is a need to recognize that, as new health information becomes available, more control may be necessary. In conclusion, it was suggested that (1) there is a need to focus on the end point or goal, (2) priorities should be set, (3) certainty in terms of environmental improvement and for the regulated community should be addressed, (4) what we are trying to accomplish should be clear, and (5) the recommendations should focus more on "voluntary" and less on "continuous improvement".

- 5. Episodic Control Measures. The recommendation addresses expanding episodic control measures to reduce peak emissions for areas struggling to maintain short-term standards. This is contingent upon an ability to predict higher air pollution levels and determine the need for greater control. However, this concept needs to be clarified, since in California, for example, ozone and PM2.5 are not episodic and more basic control is needed. On the other hand, these pollutants are thought to be episodic in Atlanta. There is already a basis for getting States to control on an episodic basis, although there is a need for better credit in SIPs. It was noted that on the stationary source side there appear to be statutory limits regarding episodic controls, while the same is not true for mobile sources. Does this need to be addressed? We should not loose sight of the fact that good baseline control all the time is desirable, but there is also a need for periodic additional control to provide further emission reduction; periodic reassessment is also desirable.
- 6. Reasonable Performance Level (RPL). This concept assumes that over a period of time all sources of air pollution will demonstrate that they are achieving RPLs to control emissions consistent with other media control programs where it is not acceptable to pollute at any level. Since the last AQM Subcommittee meeting Dan Johnson, John Hornback and Brock Nicholson had reviewed this concept and agreed that previous examples may have been too severe. There are still significant issues to resolve concerning sources, targets, etc. There may be general agreement about the desirability of the concept, but what it will take to properly package is uncertain. This is a paradigm shift that may ultimately require CAA changes. One view is that for criteria pollutants we already have this concept as "low hanging fruit", but for HAPS there could be a problem, particularly if the intent is to further screw-down sources that already are controlling. Application to all sources is troubling and it is unclear what is being targeted. What is the end-game and how often are RPLs updated? Similarly, why is new source review (NSR) needed if we were to have RPLs? Control techniques guidelines (CTGs) took a long time to develop, and weren't appropriate for all sectors, e.g., aerospace and coatings. RPLs would be a large drain on EPA resources and, although a virtuous idea, may not represent an implementable concept. The RPL concept requires a

paradigm shift and recognition that "it is unacceptable to pollute". Another view is that this concept says "it is not acceptable to have no control" and should address those who are under-controlling. To deal with this concept, it may not be necessary to make a recommendation, since consensus is difficult to build; rather, the issue and its unresolved components should be identified for others to consider and the very good discussion that has already occurred should be preserved. There is a need to do something on this concept even if it is only to document the debate. In the end, Greg requested that this last recommendation be reconsidered and a suggestion on how to proceed be brought back to the subcommittee. In the interim, comments from this discussion should be incorporated for inclusion in the August meeting and summaries.

<u>AQM Coordinating Function</u>. Lisa Gomez continued with the third category of Team 1 recommendations which includes seven topics. It was noted that there is still an issue that some have with anything on climate. It may be necessary to add a paragraph that indicates that not everyone agrees with all recommendations.

- 1. Local and Tribal Government Engagement. This recommendation indicates that the AQM process should support planning at more local levels to identify emissions reduction opportunities. It was indicated that this is already happening and the purpose is to reinforce the concept.
- 2. Incentives for Voluntary/Innovative Approaches. This recommendation indicates that the AQM process should include incentives for voluntary and innovative technologies and approaches. It was thought that input from Team 2 on this topic is desirable.
- 3. Federal Interagency Liaison Group. This recommendation indicates that such a group should be established to explore issues and opportunities for coordinating air quality goals with other planning activities at the federal level. The intent here is to encourage meeting at a high government level to facilitate cross-agency analysis for air issues. This may be outside EPA's ability to control, and details will have to be worked out by the liaison group.
- 4. Reducing Demand for Polluting Activities. This recommendation focuses on reducing public demand for polluting activities. A distinction between essential activities and discretionary activities needs to be made. Personal awareness and accountability need to be established. Team 2 is being requested to think about tools for this recommendation.
- 5. Statutory Analysis for P2 and EE/RE. This recommendation encourages the examination of existing laws to determine the extent to which they authorize pollution prevention strategies through energy efficiency and renewable energy measures. This is being restated to encourage factors rather than analyze the law. Could recommendations 5 and 6 be combined?

- 6. Overcoming Barriers to Clean Energy / Air Quality Integration. This recommendation encourages working with multiple entities to determine barriers to clean energy / air quality integration and to resolve policy issues. EPA has issued guidance, but there are concerns that there are perceived obstacles that need to be addressed. There is an education part that fits into this.
- 7. Taking Climate Change into Account in AQM Strategies. This recommendation indicates several activities that EPA should continue, including emissions and assessments. The subcommittee needs to come to agreement on the three sub-recommendations and wording is provided to honor the "Dallas agreement". EPA is already doing some of the work, and is already assisting States and localities in quantifying potential greenhouse gas co-benefits/disbenefits of emissions reduction measures; nevertheless input from multiple stakeholders may be appropriate on parts of this recommendation. Also, the third sub-recommendation could be split into two items, i.e., (C) and (D). Sub-recommendation (C) has a technical assistance intent that goes beyond and does not conflict with (A). It was noted that EPA is already helping States with tools to develop inventories, including projection tools, but should avoid wording that might imply "increasing and enhancing". The background section that had been discussed at the previous meeting, has been reduced to about on-third its original size.

It was asked if everyone could agree with these recommendations, as long as the reader is made aware of the background. However, it appears that there is not general agreement, and a disclaimer is needed about this lack of agreement. Greg indicated concern that a disclaimer weakens the report and is seeking another way to do this. His concern might be mitigated if the disclaimer is specific to climate. It was noted that others may not fully agree with all the specifics of other recommendations. EPA might try to craft an opening paragraph that provides a disclaimer that protects individual views, but indicates general overall consensus and clarifies the process used.

Team 2 Discussion: - Anna Garcia, Bob Wyman, Deborah Wood

Overview. Anna Garcia (see Team 2 Presentation) began by indicating that the Team 2 recommendations are still preliminary due to the short time since the last meeting in May. The briefing reviewed the process followed by Team 2, reviewed the Needs, Tools and Attributes (NTA) considered, discussed which NTA lent themselves to priorities that address Team 1 recommendations and where there are gaps. The context of Team 2 recommendations involved prioritizing to achieve additional emission reductions from the list of tools and provided the top three, followed by others. The emphasis was on the following source sectors: Fleets and Vehicles, Land Use and Transportation, Ships/Ports/Airports/Rail, Rural Sources, Small Emitters, Consumer Products, and Boilers and Heaters. This represents a consensus of Team 2 and feedback on what tools rise to the top is desired. A narrative needs to be created that includes the matrix. Others may comment later.

Next steps include the desire for input from Team 1 on priorities of tools, deciding how to deal with unaddressed issues from the NTAs, and determining how to

incorporate Team 2 work into final products. It was noted that the matrix condenses good information in a small space, creates a narrative of what was done and what needs to be done, and weaves unfinished business together for the meeting in early August. It is good as a source of pragmatic choices. It was suggested that this result is very specific and the process of determining how to better complete unfinished actions is needed. Additional activities might include: address sectors, not only tools, that need attention; expand consumer products to include "public behavior"; focus on public education; address activities on public lands, including user fees; consider differential pricing to force use of cleaner products; and address other consumer products, especially energy users.

Integration of Major Recommendations: - Pat Cummins

Overview. Pat Cummins lead a discussion of an outline for the final report and next steps to get there. An outline is needed to integrate recommendations from Teams 1 and 2, so that others can comment and have views included. This is a work in progress and we need to start the process of bringing the recommendations together. Pat is working from a proposed outline with six major sections, including:

- I. Background
- II. Context
- III. Challenges
- IV. Reinforce Key Aspects of Current System
- V. Key Recommendations from Phase II
- VI. Moving Forward

Background. Pat indicated that this section should not get too bogged down. It should not include tables of information, but rather provide links to other material. Key NRC recommendations might be included

Context. This section should set the stage for recommendations. A lot has been accomplished and progress made. More progress is in the works that involves both federal regulation and SIPs. Challenges ahead many include (1) changes to the air quality management system, (2) highlighting areas of key programs, (3) issues, e.g., benefits not realized in meeting attainment deadlines, turnover of diesel fleets in California to reduce PM2.5, etc. Note that SIPs are due and new NAAQS are coming. There is a need to get into the actions, and not dwell on background.

Challenges. For this section, we should rely on the draft prepared by Michael Bradley and John Bachmann.

Reinforce Key Aspects of Current System. The major point here is incremental change, rather than major change. There may be a need to add a point on how to strengthen NSR. The AQM system should continue to be evolved, not reformed; this idea should be highlighted, if appropriate. The stage should be set for the recommendations, not necessarily defending the current system. A place needs to be

found where multi-pollutant and other pollutants, e.g., air toxics and ecosystem effects, are discussed.

Key Recommendations from Phase II. In the first subsection problems should be defined and priorities set, including those identified by Group 1 and those relative to climate issues.

In the second subsection CAQMPs should be addressed. This would include a discussion of the CAQMP concept, what this would mean to State agencies and the timing, and how States are encouraged to follow through on the CAQMP concept. This subsection should be as specific as possible about CAQMP, including geographic coverage, regulatory coverage, planning cycle, and expanded role for multi-jurisdictional, local and tribal governments. How this works relative to time/cycles, etc. and the relation to health information should be addressed. What timing discretion should EPA have, since it now typically takes the full time for actions? There needs to be accountability for implementing federal and State measures. SIPs can be submitted sooner to line things up. EPA will probably never get everything to line up. A five year review cycle is important for NAAQS. States have to make the judgment on best controls across pollutants to get to needs and balance actions with deadlines. This may require the choice between two options; delay the NAAQS reviews or require accelerated SIPs. EPA should do what it can to get things lined up, or States can take independent action. It may become necessary to use SIP supplements.

The third subsection is on strategies for achieving additional emissions reductions. This should address objectives and goals as critical components of the CAQMP approach, including bringing in various components from team recommendations and indicating how to address PSD and minor source tracking such as wildfire and dust emissions as problems to control. Unresolved questions include emission reduction versus controlling growth, renewable energy versus clean energy, urban planning and where it fits, and offering some new approaches versus continuing to do things as they have been done in the past.

The fourth subsection addresses coordination of national air quality, land use, energy, transportation, and climate objectives.

Moving Forward. Pat noted that this outline is a way to start on providing the recommendations and comments that are sought on how to improve. The Team presentations, including the Team 2 tables, are thought to be a good basis for the recommendations, notably the top 3 recommendations on tools. The one-pagers on tools and the Team 1 papers should be part of the report. It is unclear where the discussion of RPLs should go; perhaps a section on unresolved issues could be created.

AQM Challenges: - Greg Green

Michael Bradley reported on progress that he and John Bachmann have made on AQM challenges, now suggested as Section III of the draft final report. They have completed work of outlining this topic and now have a context of how to fit together the

challenges. There are two major sections. One is past and current successes. The other section on challenges has several subcomponents. They include: (a) challenges such as residual nonattainment for O3 and PM (including haze) and certain source sectors; (b) air toxics, including metals, nonmetals, hotspots, microenvironments near roadways, and bioaccumulation; (c) other effects, including climate change and ecosystem effects; and (d) international/global (or intercontinental) issues. It was noted that several other individuals had volunteered to provide input. The next step is to put the outline into prose with graphics for the August meeting.

Regarding the international issues, it was noted that the United Nations Economic Commission for Europe (UNECE) has a task force on hemispheric transport which extends work to 2009; UNECE is addressing transport from the U.S. to Europe to Asia and around to the U.S.; this may be opened to China and India to participate in a planned workshop. Also, international standards have never been harmonized and this could be addressed in this section; standards in the U.S. have a more "driving" effect than they do in Europe. Environmental Justice issues are reflected in the discussion of hotspots for air toxics.

Preparation of a final report: - Greg Green

Greg indicated that the process for the draft report includes a first draft for the August meeting. The plan is to put together a small group to work on the draft. EPA staff will develop the background; Michael Bradley has the lead on the challenges section; the small group will organize the recommendations with comments/suggestions; Pat will draft recommendations into the report; the small group will prepare policy/implementation integration from the Teams 1 and 2 drafts. Input from the Teams in terms of final drafts is needed by mid-July. The small group will put together a forward looking document concerning policy and implementation issues. Greg indicated that the small group should include Seitz, McCabe, Bradley, Wyman, Gomez, Garcia, Hornback, Johnson, MacLeod; Greg should be contacted about additions to the group.

An open-ended conversation followed with may ideas. It was suggested that integration of Team 2 recommendations and matrices as a whole, rather than piecemeal, is a good idea. Also, all background documents could be put into an appendix with a final report as a collection of how it all fits together. For Team 1, a revised set of issue papers will be prepared. It was suggested that the Phase 2 report is somewhat different from that for Phase 1. Phase 1 was a set of short-term recommendations reviewed by CAAAC, while Phase 2 should be an integrated vision without losing discrete items. The final Phase 2 report should make overarching principles, such as CAQMP, clear. How CAQMP can be implemented on a voluntary basis should be addressed. Could EPA endorse this concept? On the other hand, EPA and others should not be discouraged from being creative. The case studies and examples (including RPL) should be included in the background paper. Phase 2 has big ideas, but the group is shying away from those that might require CAA amendments; the conversations about the possibility of amendments should be reflected, if not actually placed in the recommendations. Barriers to implementing the CAQMP system should be identified, including associated

recommendations. The history and progress concerning the NRC recommendations that the AQM Subcommittee has addressed should be reflected. It might also be desirable to get feedback from such groups as Environmental Council of the States (ECOS) on the relevancy of the final report; ECOS might be approached by outreach teams. Specific examples should be used in illustrating principles; how would the system be different. Include concepts in the report that were considered/discussed but not recommended at the time. We are not making recommendations on "revolutionary" changes, although some of the "tools" require legislation at some level; we should identify impediments that require regulatory change. Changes are required for many at the State/local/tribal level, not CAA amendments; whereas some tools identified, but not recommended for specific implementation and regulatory change, might require amendments. Tools that make sense, even though they may have obstacles including the need for legislative change, should be pushed forward by the AQM Subcommittee.

The emphasis in the recommendations considers the next two decades rather than the next round of SIPs; this difference should be highlighted. Ideas should be developed as problems occur, versus development in the abstract. A balance needs to be maintained so it is necessary to stay relevant. More radical ideas need discussion, but we don't want to loose more visionary ideas. TERP/Moyers have barriers that do not require amendments to the CAA, e.g., truck changes and income tax. We haven't picked or prioritized problems for which tools are identified. Should this be done in the discussion?

We could use a flexible schedule to address these issues and add time to the schedule to have discussions. Discussions may be desirable, even if it adds time to preparing the report. This reinforces the horizon of two decades that may be applicable to multi-pollutant issues. There is not enough emphasis on State/local activities that affect national programs, e.g., OTC, CA diesel, Portland land use planning. We might want to pick two or three topics to drill down, e.g., episodic controls necessary in California but not other areas where control isn't exhausted, or TERP in Texas. This requires a commitment. Bachmann's analysis and the tools are good candidates to drill down. Greg indicated that this issue should be teed-up for the leadership meeting where two or three items could be identified; a schedule relative to the August meeting should be set.

Concluding Remarks and Next Steps: - Greg Green

The next meeting is planned for Denver, CO on August 1-2 at the Adams Mark Hotel. The meeting will be for 1-1/2 days, meeting 8:30am to 5pm on the first day and 8am to 12 noon on the second.

Deb Stackhouse is to identify other groups that may need to review the recommendations, such as STAPPA/ALAPCO, ECOS, city and land use planners, with briefings to be given by members or a small group; CAAAC should be informed about the briefings. Also 2 or 3 drill down topics with legislative barriers will be identified; there may be a need to discuss this with legislative staff.

Participants -- Air Quality Management Subcommittee Meeting

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