



July 26, 2006

MEMORANDUM

SUBJECT: Charge questions for August 7, 2006 Council/AQMS review

FROM: Jim DeMocker, OAR, Senior Policy Analyst

TO: Holly Stallworth, SABSO, Council DFO

The purpose of this memorandum is to transmit a set of charge questions for consideration by the Council and Council/AQMS during the August 7, 2006 review teleconference. The materials recently submitted to the Council and Council/AQMS for review include (a) a draft emissions report describing the criteria pollutant emissions inventories for the core scenarios of the second 812 prospective study and (b) a draft Memorandum to the Files describing final air quality model selection decisions for the study. The attached charge questions focus on several particular issues as well as evaluation of the general validity and reliability of the completed emissions analysis and the model choices for the upcoming air quality modeling step.

On behalf of the 812 Project Team, your efforts and the efforts of the Council and Council/AQMS panelists in supporting improvements to the second prospective study are greatly appreciated. We look forward to the panels' review.

Please contact me if you have any questions about the attached charge questions or wish to discuss any aspect of the second prospective study.

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Attachment

Charge Questions for Council/AQMS Review of Draft Emissions Report and Air Quality Model Selection Memorandum to the Files – Second Section 812 Prospective Study

July 24, 2006

1. EPA requests that the Council review the draft Section 812 Second Prospective Study emissions report. Consistent with the statutory language defining the role of the Council in reviewing the 812 studies, EPA respectfully submits the following general charge questions:
 - a. Does the Council support the data choices made by the 812 Project Team for the development of the draft emissions report? If not, are there alternative data sets the Council recommends should be applied instead?
 - b. Does the Council support the methodological choices made for analyzing those data and developing the emissions inventories for the relevant scenarios? If not, are there alternative methodologies the Council recommends should be applied instead?
 - c. What advice does the Council have for the EPA Administrator with respect to the validity, reliability, and utility of the emissions report and the analytical results presented therein? If the validity, reliability, and/or utility of the emissions report could be improved, what specific steps does the Council recommend the 812 Project Team pursue to accomplish these improvements?

2. The general charge question #1 covers any and all aspects of the draft emissions report which the Council might consider appropriate to address in its review. In conducting this review, EPA also respectfully requests that the Council consider the following particular issues during its review. These particular topic areas represent specific analytical choices or outcomes for which the 812 Project Team is especially interested in Council advice. These topics are listed below, with reference to the chapter of the draft emissions report in which the topic is most relevant.
 - Chapter 1: Reasonableness of base year inventory choice as projection basis for with- and without- CAAA scenarios.
 - Chapter 1: Choice of AEO 2005 as projection basis for economic activity (also see related issue in Chapter 5 on the use of a non-AEO based national nonroad engine equipment projection).
 - Chapter 2: Approach for cross-referencing AEO activity indices to key categories of non-EGU point and nonpoint sources.
 - Chapter 3: Choice of alternative projection techniques for ammonia emissions in the without-CAAA case to resolve remaining inconsistencies between 1990 and 2002 ammonia emission estimation methods and source categories

- Chapter 4: Method for estimating with- and without-CAAA emissions for analysis target year 2000, relying on model-to-model comparisons but accepting some inconsistency of with-CAAA results in comparison to historical data.
 - Chapter 5: Use of trend projection for nonroad equipment populations (as embedded in NONROAD) as opposed to AEO 2005-based equipment projections, to ensure consistency within this sector of population, scrappage, and usage data within equipment classes.
 - Chapter 7: Methods for resolving inconsistencies between 1990 and 2002 ammonia emission estimation methods for key source categories.
 - Chapter 8: Method for estimating the need for local controls to meet ozone and PM NAAQS in 2010 and 2020.
3. The 812 Project Team plans to initiate the air quality modeling step for the Second 812 Prospective Study soon after the Council (esp. the Council AQMS) completes its review of the draft emissions report and the associated emissions inventories which provide the input data for the air quality model runs. The 812 Project Team has prepared a draft Memorandum to the 812 Files which, when finalized, will establish the final EPA decision regarding the air quality model or models to be employed for the core, criteria pollutant modeling step. Does the Council support the model choices incorporated in the draft Memorandum to the Files? If not, are there alternative models which the Council recommends EPA should consider?

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