

APPENDIX C | QUALITATIVE UNCERTAINTY SUMMARY TABLES FOR
SECOND SECTION 812 PROSPECTIVE ANALYSIS OF
THE CLEAN AIR ACT

EXHIBIT C-1. KEY UNCERTAINTIES ASSOCIATED WITH COST ESTIMATION

POTENTIAL SOURCE OF ERROR	DIRECTION OF POTENTIAL BIAS FOR NET BENEFITS	LIKELY SIGNIFICANCE RELATIVE TO KEY UNCERTAINTIES ON NET BENEFITS ESTIMATE ¹
Costs for some technologies and emissions sectors reflect SAB-recommended default assumptions about technological progress rather than empirical information.	Underestimate	Probably minor. Based on the advice of the SAB Council on Clean Air Compliance Analysis, we used a conservative learning rate of 10 percent for those sectors where no empirical data were available. ² In contrast, the learning curve literature suggests that the average learning rate is approximately 20 percent, suggesting that learning will reduce costs more than is reflected in the present analysis. ³
Errors in the economic growth projections that form the basis of the cost analysis.	Unable to determine based on current information	Probably minor. The project team used AEO 2005 economic growth projections, which suggest that the economy will grow at an annual rate of 3.1 percent through 2025. ⁴ This growth rate is in line with historical GDP growth.
Incomplete characterization of certain indirect costs, such as productivity impacts for regulated industry and performance degradation associated with emission control technology.	Overestimate	Probably minor. The literature on the productivity impacts of the CAAA is unclear with respect to the direction and magnitude of these effects. In addition, few data exist on the performance degradation effects of CAAA regulations.
Uncertainty in the maximum per ton costs for local controls to comply with the 8-hour Ozone and PM _{2.5} NAAQS.	Unable to determine based on current information	Probably minor. Our analysis of local controls assumes a maximum cost of \$15,000 per ton for local controls implemented to comply with 8-hour Ozone and PM _{2.5} NAAQS requirements. ⁵ Local areas may implement more costly controls to comply with the NAAQS, but technological innovation may lead to the development of less expensive controls.
Partial estimation of costs for compliance with the PM _{2.5} NAAQS, due to the unavailability of emission reduction targets for non-attainment areas.	Overestimate	Probably minor. Based on the results of the present analysis and the cost estimates generated for the PM _{2.5} NAAQS RIA, we estimate that the costs of the PM _{2.5} NAAQS represent a small portion of the net benefits of the Amendments. ^{6,7}
Errors in the emission reduction estimates used to estimate the costs for select rules.	Unable to determine based on current information	Probably minor. Costs for many rules are not dependent on the corresponding emissions reductions (e.g., fuel sulfur limits, tailpipe standards, etc.)

POTENTIAL SOURCE OF ERROR	DIRECTION OF POTENTIAL BIAS FOR NET BENEFITS	LIKELY SIGNIFICANCE RELATIVE TO KEY UNCERTAINTIES ON NET BENEFITS ESTIMATE ¹
Errors in the projected composition of motor vehicle sales and the fuel efficiency of the motor vehicle fleet.	Unable to determine based on current information	Probably minor. We projected the composition of motor vehicle sales and the fuel efficiency of the motor vehicle fleet based on AEO 2005 data. The sensitivity analysis of alternative sales and fuel efficiency projections presented in this report suggests that this uncertainty has a small impact on net benefits.
Errors in assumptions regarding failure rates for motor vehicle inspections.	Unable to determine based on current information	Probably minor. The repair costs for vehicles that fail emission inspections represent a small fraction of the estimated net benefits of the Amendments. The failure rate sensitivity analysis presented in this report suggests that alternative failure rate assumptions would have only a minor effect on the estimated net benefits of the Amendments.
Exclusion of the impact of economic incentive provisions, including banking, trading, and emissions averaging provisions.	Underestimate	Probably minor. Economic incentive provisions can substantially reduce costs, but the major economic programs for trading of sulfur and nitrogen dioxide emissions are reflected in the analysis.
<p>¹ The classification of each potential source of error reflects the best judgment of the section 812 Project Team. The Project Team assigns a classification of "potentially major" if a plausible alternative assumption or approach could influence the overall monetary benefit estimate by approximately five percent or more; if an alternative assumption or approach is likely to change the total benefit estimate by less than five percent, the Project Team assigns a classification of "probably minor."</p> <p>² U.S. Environmental Protection Agency Science Advisory Board, EPA-SAB-COUNCIL-ADV-07-002, "Benefits and Costs of Clean Air Act - Direct Costs and Uncertainty Analysis", Advisory Letter, June 8, 2007. Available at http://www.epa.gov/sab/pdf/council-07-002.pdf.</p> <p>³ For an analysis of the learning rates estimated in the empirical literature, see John M. Dutton and Annie Thomas, "Treating Progress Functions as a Managerial Opportunity," <i>Academy of Management Review</i>, Vol 9, No. 2, 1984.</p> <p>⁴ U.S. Department of Energy, Energy Information Administration, <i>Annual Energy Outlook 2005</i>, February 2005.</p> <p>⁵ The Project Team uses this maximum unit cost value in two ways. First, the Project Team assumes that local areas would not implement identified controls costing more than \$15,000 per ton. Second, the Project Team assumes a cost of \$15,000 per ton for unidentified controls.</p> <p>⁶ For estimates of the costs of the Amendments, see E.H. Pechan and Associates, Inc. and Industrial Economics, Inc., <i>Direct Cost Estimates for the Clean Air Act Second Section 812 Prospective Analysis</i>, prepared for U.S. EPA, March 2009. For preliminary benefits estimates, see the main 812 report.</p> <p>⁷ U.S. Environmental Protection Agency. <i>Regulatory Impact Analysis for the Particulate Matter NAAQS</i>. October, 2006.</p>		

TABLE C-2. KEY UNCERTAINTIES ASSOCIATED WITH EMISSIONS ESTIMATION

POTENTIAL SOURCE OF ERROR	DIRECTION OF POTENTIAL BIAS FOR NET BENEFITS	LIKELY SIGNIFICANCE RELATIVE TO KEY UNCERTAINTIES ON NET BENEFITS ESTIMATE*
Uncertainties in biogenic emissions inputs increase uncertainty in the AQM estimates. Uncertainties in biogenic emissions may be large ($\pm 80\%$). The biogenic inputs affect the emissions-based VOC/NO _x ratio and, therefore, potentially affect the response of the modeling system to emissions changes.	Underestimate. The underestimate of biogenic emissions would reduce overall reactivity leading to underestimates of the model's response to emission reductions.	Potentially major. Impacts for ozone and PM _{2.5} results. Both oxidation potential and secondary organic aerosol formation could influence PM _{2.5} formation significantly. However, ozone benefits contribute only minimally to net benefit projections in this study.
The With-CAAA scenario includes implementation of the Clean Air Mercury Rule (CAMR), which has been vacated, and Clean Air Interstate Rule (CAIR), which was vacated but has since been remanded.	Overestimate.	Potentially major. Significance in 2020 will depend on the speed and effectiveness of implementing CAIR and replacing CAMR. In some areas, emissions reductions are expected to be overestimated, but in other areas, NO _x inhibition of ozone leads to underestimates of ozone benefits (e.g., some urban centers).
VOC emissions are dependent on evaporation, and future patterns of temperature are difficult to predict.	Overestimate.	Probably minor. An acceleration of climate change (warming) could increase emissions but the increase over 30 years would not likely be significant.
Use of average temperatures (i.e., daily minimum and maximum) in estimating motor-vehicle emissions artificially reduces variability in VOC emissions.	Unable to determine based on current information.	Probably minor. Use of averages will overestimate emissions on some days and underestimate on other days. Effect is mitigated in With-CAAA scenarios because of more stringent evaporative controls that are in place by 2000 and 2010.

POTENTIAL SOURCE OF ERROR	DIRECTION OF POTENTIAL BIAS FOR NET BENEFITS	LIKELY SIGNIFICANCE RELATIVE TO KEY UNCERTAINTIES ON NET BENEFITS ESTIMATE ⁷
<p>Economic growth factors used to project emissions are an indicator of future economic activity. These growth factors reflect uncertainty in economic forecasting as well as uncertainty in the link to emissions. IPM projections may be reasonable regionally but may introduce significant biases locally. Also, the Annual Energy Outlook 2005 growth factors do not reflect the recent economic downturn or the volatility in fuel prices since the fall of 2005.</p>	<p>Unable to determine based on current information.</p>	<p>Probably minor. The same set of growth factors are used to project emissions under both the Without-CAAA and With-CAAA scenarios, mitigating to some extent the potential for significant errors in estimating differences in emissions. Some specific locations may be more significantly influenced.</p>
<p>Uncertainties in the stringency, scope, timing, and effectiveness of With-CAAA controls included in projection scenarios.</p>	<p>Unable to determine based on current information.</p>	<p>Probably minor. Future controls could be more or less stringent, wide, or effective than projected. Timing of emissions reductions may also be affected.</p>
<p>Emissions estimated at the county level (e.g., low-level source and motor vehicle NO_x and VOC emissions) are spatially and temporally allocated based on land use, population, and other surrogate indicators of emissions activity. Uncertainty and error are introduced to the extent that area source emissions are not perfectly spatially or temporally correlated with these indicators.</p>	<p>Unable to determine based on current information.</p>	<p>Probably minor. Potentially major for estimation of ozone, which depends largely on VOC and NO_x emissions; however, ozone benefits contribute only minimally to net benefit projections in this study.</p>
<p>The location of the emissions reductions achieved from unidentified measures is uncertain. We currently treat these reductions as if they're achieved from non-point sources, but this may not be correct in all cases.</p>	<p>Unable to determine based on current information.</p>	<p>Probably minor. Impacts from these uncertainties would be localized and would not significantly change the overall net benefit estimate.</p>

POTENTIAL SOURCE OF ERROR	DIRECTION OF POTENTIAL BIAS FOR NET BENEFITS	LIKELY SIGNIFICANCE RELATIVE TO KEY UNCERTAINTIES ON NET BENEFITS ESTIMATE ²
<p>The on-road source emissions projections reflect MOBILE6.2 data on the composition of the vehicle fleet. If recent volatility fuel prices persists or if fuel prices rise significantly (like they did in 2007 and 2008), the motor vehicle fleet may include more smaller, lower-emitting automobiles and fewer small trucks (e.g., SUVs).</p>	<p>Underestimate</p>	<p>Probably minor.</p>

TABLE C-3. KEY UNCERTAINTIES ASSOCIATED WITH AIR QUALITY MODELING

POTENTIAL SOURCE OF ERROR	DIRECTION OF POTENTIAL BIAS FOR NET BENEFITS	LIKELY SIGNIFICANCE RELATIVE TO KEY UNCERTAINTIES ON NET BENEFITS ESTIMATE*
Unknown meteorological biases in the 12-km western and 36-km MM5 domains due to the lack of model performance evaluations.	Unable to determine based on current information.	Probably minor. Other evaluations using 2002 and similar meteorology and CMAQ have shown reasonable model performance. Although potentially major affects on nitrate results in western areas with wintertime PM _{2.5} problems.
Known metrological biases in the 12-km eastern MM5 domain. MM5 has a cold bias during the winter and early spring, and has a general tendency to underestimate the monthly observed precipitation. MM5's under prediction was greatest in the fall and least in the spring months.	Unable to determine based on current information.	Probably minor. These biases would likely influence PM _{2.5} formation processes, which was modeled on the 36-km domain.
Secondary organic aerosol (SOA) chemistry. CMAQ version 4.6 has known biases (underprediction) in SOA formation.	Underestimate.	Probably minor. A significant portion of SOA forms from biogenic emissions.
The CMAQ modeling relies on a modal approach to modeling PM _{2.5} instead of a sectional approach. The modal approach is effective in modeling sulfate aerosol formation but less effective in modeling nitrate aerosol formation than the sectional approach.	Unable to determine based on current information.	Probably minor in the eastern U.S. where annual PM _{2.5} is dominated by sulfate. Potentially major in some western U.S. areas where PM _{2.5} is dominated by secondary nitrate formation.
No model performance evaluation of CMAQ for 2002.	Unable to determine based on current information.	Probably minor. Other evaluations using 2002 and similar meteorology and CMAQ have shown reasonable model performance.
Ozone modeling relies on a 12-km grid, suggesting NO _x inhibition of ambient ozone levels may be under-represented in some urban areas. Grid resolution may affect both model performance and response to emissions changes.	Unable to determine based on current information.	Probably minor. Though potentially major ozone results in those cities with known NO _x inhibition, ozone benefits contribute only minimally to net benefit projections in this study. Grid size affects chemistry, transport, and diffusion processes, which in turn determine the response to changes in emissions, and may also affect the relative benefits of low-elevation versus high-stack controls.

POTENTIAL SOURCE OF ERROR	DIRECTION OF POTENTIAL BIAS FOR NET BENEFITS	LIKELY SIGNIFICANCE RELATIVE TO KEY UNCERTAINTIES ON NET BENEFITS ESTIMATE*
Emissions estimated at the county level (e.g., low-level source and motor vehicle NO _x and VOC emissions) are spatially and temporally allocated based on land use, population, and other surrogate indicators of emissions activity. Uncertainty and error are introduced to the extent that area source emissions are not perfectly spatially or temporally correlated with these indicators.	Unable to determine based on current information.	Probably minor. Potentially major for estimation of ozone, which depends largely on VOC and NO _x emissions; however, ozone benefits contribute only minimally to net benefit projections in this study.
Use of the PM RSM outside the validated bounds of the model.	Unable to determine based on current information.	Probably minor. The PM RSM is designed to estimate PM _{2.5} concentrations resulting from changes in precursor emission between zero and 120 percent of a 2015 baseline emission levels. The model has not been validated for accuracy outside of these bounds. This analysis does look at changes in precursor emissions greater than 120 percent. The Project Team limits changes to 500 percent of the baseline to avoid straying too far outside the calibrated bounds of the PM RSM.
The PM RSM and CMAQ yield different air quality results.	Unable to determine based on current information.	Probably minor. Due to time and budget constraints, CMAQ could not be run for all of the uncertainty analysis, so the PM RSM was run as a surrogate. The core scenarios were run though both models and, in places, the results differ dramatically. Fortunately, the uncertainty analysis performed focuses on relative air quality changes, and thus the absolute values are less important for this analysis.
<p>* The classification of each potential source of error is based on those used in the First Prospective Analysis. The classification of “potentially major” is used if a plausible alternative assumption or approach could influence the overall monetary benefit estimate by approximately 5% or more; if an alternative assumption or approach is likely to change the total benefit estimate by less than 5%, the classification of “probably minor” is used.</p>		

TABLE C-4. KEY UNCERTAINTIES ASSOCIATED WITH HUMAN HEALTH EFFECTS MODELING

POTENTIAL SOURCE OF ERROR	DIRECTION OF POTENTIAL BIAS FOR NET BENEFITS ESTIMATE	LIKELY SIGNIFICANCE RELATIVE TO KEY UNCERTAINTIES IN NET BENEFIT ESTIMATE*
Application of C-R relationships only to those subpopulations matching the original study population.	Underestimate	Potentially major. The C-R functions for several health endpoints (including PM-related premature mortality) were applied only to subgroups of the U.S. population (e.g. adults 30+) and thus may underestimate the whole population benefits of reductions in pollutant exposures. In addition, the demographics of the study population in the Pope et al. and Laden et al. studies (largely white and middle class) may result in an underestimate of PM-related mortality, because the effects of PM tend to be significantly greater among groups of lower socioeconomic status.
No quantification of health effects associated with exposure to air toxics.	Underestimate	Potential major. According to EPA criteria, over 100 air toxics are known or suspected carcinogens, and many air toxics are also associated with adverse health effects such as neurotoxicity, reproductive toxicity, and developmental toxicity. Unfortunately, current data and methods are insufficient to develop (and value) quantitative estimates of the health effects of these pollutants.
Analysis assumes a causal relationship between PM exposure and premature mortality based on strong epidemiological evidence of a PM/mortality association. However, epidemiological evidence alone cannot establish this causal link.	Unable to determine based on current information	Potentially major. A basic underpinning of this analysis, this assumption is critical to the estimation of health benefits. However, the assumption of causality is suggested by the epidemiologic evidence and is consistent with current practice in the development of a best estimate of air pollution-related health benefits. At this time, we can identify no basis to support a conclusion that such an assumption results in a known or suspected overestimation bias.

POTENTIAL SOURCE OF ERROR	DIRECTION OF POTENTIAL BIAS FOR NET BENEFITS ESTIMATE	LIKELY SIGNIFICANCE RELATIVE TO KEY UNCERTAINTIES IN NET BENEFIT ESTIMATE*
<p>Across-study variance/application of regionally derived C-R estimates to entire U.S.</p>	<p>Unable to determine based on current information</p>	<p>Potentially major. The differences in the expected changes in health effects calculated using different underlying studies can be large. If differences reflect real regional variation in the relationship, applying individual C-R functions throughout the U.S. could result in considerable uncertainty in health effect estimates.</p>
<p>The baseline incidence estimate of chronic bronchitis based on Abbey et al. (1995) excluded 47 percent of the cases reported in that study because those reported "cases" experienced a reversal of symptoms during the study period. These "reversals" may constitute acute bronchitis cases that are not included in the acute bronchitis analysis (based on Dockery et al. 1996).</p>	<p>Underestimate</p>	<p>Probably minor. The relative contribution of acute bronchitis cases to the overall benefits estimate is small compared to other health benefits such as avoided mortality and avoided chronic bronchitis.</p>
<p>CAAA fugitive dust controls implemented in PM non-attainment areas would reduce lead exposures by reducing the re-entrainment of lead particles emitted prior to 1990. This analysis does not estimate these benefits.</p>	<p>Underestimate</p>	<p>Probably minor. While the health and economic benefits of reducing lead exposure can be substantial (e.g., see section 812 Retrospective Study Report to Congress), most additional fugitive dust controls implemented under the Post-CAAA scenario (e.g., unpaved road dust suppression, agricultural tilling controls, etc.) tend to be applied in relatively low population areas.</p>
<p>Exclusion of C-R functions from short-term exposure studies in PM mortality calculations.</p>	<p>Underestimate</p>	<p>Probably minor. Long-term PM exposure studies may be able to capture some of the impact of short-term peak exposure one mortality; however, the extent of overlap between the two study types is unclear.</p>

POTENTIAL SOURCE OF ERROR	DIRECTION OF POTENTIAL BIAS FOR NET BENEFITS ESTIMATE	LIKELY SIGNIFICANCE RELATIVE TO KEY UNCERTAINTIES IN NET BENEFIT ESTIMATE*
Age-specific C-R functions for PM related premature mortality not reported by C-R functions applied. Estimation of the degree of life-shortening associated with PM-related mortality used a single C-R function for all applicable age groups.	Unable to determine based on current information	Unknown, possibly major when estimating life years lost. Varying the estimate of degree of prematurity has no effect on the aggregate benefit estimate when a value of statistical life approach is used, since all incidences of premature mortality are valued equally. Under the alternative approach based on valuing individual life-years, the influence of alternative values for number of average life years lost may be significant.
Extrapolation of criteria pollutant concentrations to populations distant from monitors.	Unable to determine based on current information	Probably minor. Extrapolation method is most accurate in areas where monitor density is high. Monitor density tends to be highest in areas with high criteria pollutant exposures; thus most of this uncertainty affects low exposure areas where benefits are likely to be low. In addition, an enhanced extrapolation method incorporation modeling results is used for areas far (> 50 km) from a monitor.
Mortality health impact did not include pollutants other than PM or ozone.	Unable to determine based on current information	Probably minor. If other criteria pollutants correlated with PM contribute to mortality, that effect may be captured in the PM estimate. This uncertainty does make it difficult to disaggregate avoided mortality benefits by pollutant.
Pooling of two ozone mortality incidence estimates to present a primary estimate.	Unable to determine based on current information	Potentially major. Pooling with provides a central estimate of ozone mortality benefits, but it is not clear that the two ozone mortality incidence studies should be combined in this manner. Relying on another single or combination of studies may result in significantly different benefits related to ozone.
No cessation lag was used for ozone mortality.	Overestimate	Probably minor. If there is a time lag between changes in ozone exposure and the total realization of changes in health effects then benefits occurring in the future should be discounted. The use of no lag assumes that all mortality benefits are realized in the year of the exposure change and therefore no discounting occurs. This may lead to an overestimate of benefits.

POTENTIAL SOURCE OF ERROR	DIRECTION OF POTENTIAL BIAS FOR NET BENEFITS ESTIMATE	LIKELY SIGNIFICANCE RELATIVE TO KEY UNCERTAINTIES IN NET BENEFIT ESTIMATE*
<p>* The classification of each potential source of error reflects the best judgment of the section 812 Project Team. The Project Team assigns a classification of “potentially major” if a plausible alternative assumption or approach could influence the overall monetary benefit estimate by approximately five percent or more; if an alternative assumption or approach is likely to change the total benefit estimate by less than five percent, the Project Team assigns a classification of “probably minor.”</p>		

TABLE C-5. KEY UNCERTAINTIES ASSOCIATED WITH VALUATION OF HEALTH BENEFITS

POTENTIAL SOURCE OF ERROR	DIRECTION OF POTENTIAL BIAS FOR NET BENEFITS	LIKELY SIGNIFICANCE RELATIVE TO KEY UNCERTAINTIES IN NET BENEFIT ESTIMATE*
Benefits transfer for mortality risk valuation, including differences in age, income degree of risk aversion, the nature of the risk, and treatment of latency between mortality risks presented by PM/ozone and the risks evaluated in the available economic studies.	Unable to determine based on currently available information	Potentially major. The mortality valuation step is clearly a critical element in the net benefits estimate, so any uncertainties can have a large effect. As discussed in the text, however, information on the combined effect of these known biases is relatively sparse, and it is therefore difficult to assess the overall effect of multiple biases that work in opposite directions.
Benefits transfer for chronic bronchitis, including adjustments made to better match the severity of the risks modeled in the available economic studies.	Unable to determine based on currently available information	Probably minor. Benefits of avoided chronic bronchitis account for a small portion of total PM benefits, limiting the effect on net benefits. Steps taken in the study to adjust for severity using the best available empirical information likely limit the effect to much less than this maximum value.
Inability to value some quantifiable morbidity endpoints, such as impaired lung function.	Underestimate	Probably minor. Reductions in lung function are a well-established effect, based on clinical evaluations of the impact of air pollutants on human health, and the effect would be pervasive, affecting virtually every exposed individual. There is therefore a potential for a major impact on benefits estimates. The lack of a clear symptomatic presentation of the effect, however, could limit individual WTP to avoid lung function decrements.
<p>* The classification of each potential source of error reflects the best judgment of the section 812 Project Team. The Project Team assigns a classification of "potentially major" if a plausible alternative assumption or approach could influence the overall monetary benefit estimate by approximately five percent or more; if an alternative assumption or approach is likely to change the total benefit estimate by less than five percent, the Project Team assigns a classification of "probably minor."</p>		

TABLE C-6. KEY UNCERTAINTIES ASSOCIATED WITH ECOLOGICAL EFFECTS ESTIMATION

POTENTIAL SOURCE OF ERROR	DIRECTION OF POTENTIAL BIAS FOR NET BENEFITS	LIKELY SIGNIFICANCE RELATIVE TO KEY UNCERTAINTIES ON NET BENEFITS ESTIMATE*
<p>Incomplete coverage of ecological effects identified in existing literature, including the inability to adequately discern the role of air pollution in multiple stressor effects on ecosystems. Examples of categories of potential ecological effects for which benefits are not quantified include: reduced eutrophication of estuaries, reduced acidification of soils, reduced bioaccumulation of mercury and dioxins in the food chain.</p>	<p>Underestimate</p>	<p>Potentially major. The extent of unquantified and unmonetized benefits is largely unknown, but the available evidence suggests the impact of air pollutants on ecological systems may be widespread and significant.</p>
<p>Incomplete geographic scope of recreational fishing benefits associated with reduced lake acidification analysis due to case study approach.</p>	<p>Underestimate</p>	<p>Potentially major. As a case study focused on New York State, the estimated benefits to recreational fishing reflect only a portion of the overall benefits of reduced acidification on this service flow.</p>
<p>Incomplete assessment of long-term bioaccumulative and persistent effects of air pollutants.</p>	<p>Underestimate</p>	<p>Potentially major. Little is currently known about the longer-term effects associated with the accumulation of toxins in ecosystems. But what is known suggests the potential for major impacts. Future research into the potential for threshold effects is necessary to establish the ultimate significance of this factor.</p>
<p>Omission of the effects of nitrogen deposition as a nutrient with beneficial effects.</p>	<p>Overestimate</p>	<p>Probably minor. Although nitrogen does have beneficial effects as a nutrient in a wide range of ecological systems, nitrogen in excess also has significant and in some cases persistent detrimental effects that are also not adequately reflected in the analysis.</p>
<p>* The classification of each potential source of error reflects the best judgment of the section 812 Project Team. The Project Team assigns a classification of “potentially major” if a plausible alternative assumption or approach could influence the overall monetary benefit estimate by approximately five percent or more; if an alternative assumption or approach is likely to change the total benefit estimate by less than five percent, the Project Team assigns a classification of “probably minor.”</p>		