

**Mid-Atlantic/Northeast Visibility Union
Regional Haze Program Stakeholder Review Meeting
September 19, 2001, Washington, D.C.**

Meeting Summary

On September 19, 2001, the Mid-Atlantic/Northeast Visibility Union (MANE-VU) held a Regional Haze Program Stakeholder Review Meeting in Washington, D.C. at the Hall of States. This meeting was an opportunity for regional haze stakeholders to provide feedback on several recent reports concerning regional haze in the Mid-Atlantic and Northeast regions. MANE-VU solicited stakeholder feedback on these reports in order to guide future work.

The five technical reports discussed were:

- Regional Haze and Visibility in the Northeast and Mid-Atlantic States
- Assessment of Emissions Inventory Needs for Regional Haze Plans
- A Basis for Control of BART-Eligible Sources
- Source Apportionment Analysis of Air Quality Data: Phase 1A
- Work Plan for a Survey to Determine Residential Wood Combustion and Open Burning Activity

In addition to seeking feedback on the reports, MANE-VU solicited feedback on how to obtain stakeholder input on technical issues.

Forty-one participants attended the meeting, either providing feedback (both formally and informally) or observing the discussion and presentations. Participants largely represented state-level environmental agencies (16 participants). Additionally, 13 participants represented industry, 1 represented the federal land managers, and 1 represented an environmental group. The remaining 10 participants represented the Mid-Atlantic Regional Air Management Association (MARAMA), the Northeast States for Coordinated Air Use Management (NESCAUM), the Ozone Transport Commission (OTC), consulting firms, reporters, or other organizations. A list of all participants is available on the MANE-VU website at http://www.sso.org/otc/regional_haze/regionalhaze.htm.

The agenda was designed to maximize both stakeholder involvement and information transfer. The meeting began with an opportunity to discuss opportunities for stakeholder involvement. Overview presentations on each of the five reports, followed by brief question and answer sessions, were given in the morning to provide a common starting point for all participants. Opportunities to discuss the stakeholder process and to provide feedback, ask questions, and participate in group discussion followed in the afternoon.

This summary highlights suggestions, points of discussion, clarifications, and action items noted at the meeting. Formal presentations made at the meeting or submitted to MANE-VU are also available http://www.sso.org/otc/regional_haze/regionalhaze.htm.

Introductory Remarks

Dick Valentinetti (VT, MANE-VU) chaired the meeting. He opened the meeting by welcoming participants. Following introductions of participants, he said that the purpose of the meeting was to provide stakeholders with an opportunity to provide input on MANE-VU technical reports. MANE-VU was soliciting stakeholder feedback on these reports in order to help guide future work. He also asked the participants for feedback on how to provide technical input from outside sources. He said that MANE-VU is considering the following:

- Improve technical coordination among Regional Planning Organizations (e.g., agreement on map projections and grid sizes), recognizing that each RPO is different.
- Model technical processes around LADCO's process in that stakeholders should provide technical input, not just send attorneys to take notes.
- Implement an interactive process at the committee level for technical issues.
- Utilize a single Technical Support Committee to facilitate technical exchange. There would be sub-sections dealing with topics like modeling, emissions inventory, and data analysis.
- Seek technical input from different groups.
- Reconcile overlapping issues and differences among programs and regulations.

Mr. Valentinetti offered an opportunity for those present to comment on process issues in order to maximize participation in the technical process. The first technical meetings were tentatively scheduled for early December 2001. MANE-VU was seeking feedback from stakeholders on how they would like this process to proceed.

Regional Haze and Visibility in the Northeast and Mid-Atlantic States

Gary Kleiman (NESCAUM) summarized the report "Regional Haze and Visibility in the Northeast and Mid-Atlantic States." Mr. Kleiman began with an explanation of the driving force behind the regional haze program (the Clean Air Act) and clearly defined the goals and scope of the report. This report provides a comprehensive introduction to the problem of visibility impairment in the Northeast, develops a detailed preliminary assessment of regional haze, and examines new technical aspects to the issue. Through the course of his presentation, Mr. Kleiman noted several key points, results, and clarifications regarding the report:

- There are seven Class I areas in the MANE-VU region.

- The visibility problem is linked to other aspects of air quality such as fine particles, acid deposition and ground-level ozone formation. All effects must be considered together when designing control strategies. .
- The estimates of natural background in the report are based on methodologies from the FLAG report. Guidance on the calculation of these figures is forthcoming from EPA.
- The report does not attempt to establish “baseline data,” but is a preliminary assessment of visibility conditions. The term “baseline” has regulatory implications that have not been fully examined.
- All Class I areas experience significant visibility impairment on the “worst days” and certain more southerly areas, including Brigantine Wilderness Area, have substantial visibility impairment, even on the “best days.” (The “best days” were defined as the 20% of days with the best visibility.)
- The report recommends four distinct types of modeling to provide an overall “weight-of-evidence” modeling approach. These include using a 3-D Eulerian model, source dispersion modeling, trajectory analysis (which provides information regarding meteorological pathways) and source apportionment techniques (a type of factor analysis).
- Most of the data in the report was from the IMPROVE program, which has been expanded. The CAMNET program also gathers data, and Mr. Kleiman indicated that this program is an excellent opportunity for outreach and education.
- Health care costs, recreational spending, and tourism are major considerations for the social and economic aspects of visibility improvement.
- This report was put together in the early stages of the RPO process when there was not a stakeholder process. Mr. Kleiman indicated he was looking for comments on: 1) metrics and methodology, 2) atmospheric chemistry and keeping up with the most current academic research, and 3) other technical aspects of the report.

Participant comments and questions included the following:

- Edward Kropp (MOG/Jackson & Kelly) asked if NESCAUM was looking at the comments MOG submitted in July. Mr. Kleiman answered that he had reviewed the comments, he agreed with some of them, and he would be taking a closer look at them. Mr. Kropp indicated that this was encouraging, since that was the first acknowledgement he had received on his submission. (At this point, Dick Valentinetti assured participants that MANE-VU would be preparing responses to comments.)
- Jim Collier (DC Dept of Health) noted that freshwater streams have been affected by algae blooms and should be noted as influenced by nitrate deposition.

- Jim Murphy (Allegheny Energy Supply) indicated that the recent trends report includes a correction on the calculation of natural background and baseline data. He asked whether the report reflected changes in the method of calculating visibility. Mr. Kleiman answered that the calculations in the report were based on the IMPROVE data and were done as of a year ago. Therefore, any changes made in the last year were not reflected in the report.
- Bruce Polkowsky (NPS) indicated that changes in the monitoring methods resulted from a cross check of elemental sulfur and sulfate. He recommended using the best methodology. Mr. Kleiman answered that the new method is not likely to make much change in the visibility calculations, but the data will be revised and updated as methods are updated. Mr. Kropp disagreed with Mr. Kleiman's statement on numbers not being affected much, indicating they have found that some numbers may change by up to 20%.
- Bob Bessette (CIBO) asked if the report describes assumptions on socio-economic parameters. Further, John Paul (CEED) asked what methodologies were used for calculating economic and social benefits of visibility improvements. Mr. Kleiman answered that the report drew upon available literature, and NESCAUM did not do their own studies. He said that if the audience knew of additional information than what the report includes that he would appreciate knowing about it. The report cites all the studies referenced.
- John Paul commented that the presentation did not include the estimated costs of controls.
- Bob Bessette asked if the over \$130 billion per year in recreational spending is related to a relative change in visibility. Mr. Kleiman answered that the report attempts to quantify the perceived benefits of a view. There are incremental benefits associated with changes related to improved visibility. Frank Divita (E.H. Pechan & Assoc.) clarified that the report uses EPA's recommended methodology, which is outlined in EPA's Regulatory Impact Analysis.

Emissions Inventory Needs for Regional Haze Plans: An Assessment for MANE-VU and VISTAS

Susan Wierman (MARAMA) presented a summary of the report "Emissions Inventory Needs for Regional Haze Plans: An Assessment for MANE-VU and VISTAS." Ms. Wierman noted that the study's author, Mark Saeger (Pacific Environmental Services), was in the audience and available to answer any technical questions. Ms. Wierman began by explaining the report's purpose of helping states meet the requirements of the regional haze regulations and presenting a 5-year work plan for emissions inventory improvements. Through the course of her presentation, Ms. Wierman noted several key points and clarifications regarding the report:

- Ammonia was identified as a key pollutant contributing to visibility impairment since it participates in chemical reactions.
- The 2002 inventory is expected to be used as the base year.
- The PM_{2.5} inventory was prepared by EPA and is largely based on the PM₁₀ inventory, which is not necessarily an accurate judgment for PM_{2.5}.

- Carnegie Mellon University is currently revising the ammonia inventory. This effort is on going and will improve upon current data.
- The general approach for the work plan is to phase-in improvements, aim for consistency within and between regions, and rely on EIIP methodology.

Participant comments and questions included the following:

- With regard to updating activity data, as outlined in the work plan for 2002, John Paul asked how data would be gathered on agricultural ammonia sources and on mobile sources. He did not notice a reference to SAMI and they have dealt with agriculture issues. Did they turn their work over to VISTAS? Ms. Wierman answered that MARAMA is working with their usual partners – the states and their departments of transportation to see what data on mobile sources is available. For agricultural data, they were working with other RPOs to determine what information is available, as well as the NPDES permittees. Mark Saeger indicated that WRAP has been looking at agriculture issues as well.
- Jim Collier and William Butler commented that a lot of work has been done on the ammonia issue, for example at the Chesapeake Bay Program, with work and literature searches on mass balance. Ms. Wierman indicated that Serpil Kayin attends the Chesapeake Bay Program Air Subcommittee meetings Ms. Kayin stated that the Chesapeake Bay Program uses EPA data, and the CMU data will be an improvement over the current data set. Mr. Collier encouraged Ms. Wierman and Ms. Kayin to look into the mass balance work done by the Bay Program's Nutrient Subcommittee.
- Dick Valentinetti agreed that the ammonia inventory is “the weakest link,” and he explained that MARAMA and NESCAUM have been working to improve the data.

In the afternoon, participants made several points regarding this report:

- Edward Kropp indicated there are stakeholders who would like to help with the phase-in of the emissions inventory work plan. States should not use the 1996 National Emissions Inventory for policy determinations.
- Bill Butler expressed concern that EPA is not correcting errors in the NET inventory.
- Mr. Kropp said there should be more work on the ammonia inventory.
- Mr. Kropp asked MANE-VU to consider microinventories around Class I areas. Bruce Polkowsky indicated that the National Park Service said that it will conduct microinventories in its Class I areas in parks by the end of 2002. He believes there may be community issues that will need to be addressed.

- Dick Valentinetti emphasized the importance of explaining methods when developing emissions inventories. Mr. Kropp suggested using a common RPO database and looking into sources of help other than EPA.
- Mark Saeger (PES) commented that industry can help with the emissions inventory (i.e., fuel use, throughput, control efficiencies, etc.). For example, WRAP put an inventory up on their website and industry commented. Mr. Valentinetti commented that everyone should be aware of data quality and data limitations that are inherent in all databases.

Mr. Kropp also indicated that he would be submitting further comments in a written format.

A Basis for Control of BART-Eligible Sources

Gary Kleiman presented a summary of the report “A Basis for Control of BART-Eligible Sources.” By 2064, there is the goal of reaching natural background levels of visibility impairment, and BART controls will help achieve that goal. Through the course of his presentation, Mr. Kleiman noted several key points, results, and clarifications regarding the report:

- The report reviewed the impact of using deciviews (dv) as the metric for visibility impairment. To make the continued linear reductions in visibility impairment, there will need to be a greater than linear decrease in fine particle mass.
- EPA used the RADM Tagged Species Model in a 1995 acid deposition NAAQS feasibility study (results are given in the appendix of that study). These results were used in the report to identify regions that contribute to sulfate deposition in Northeast Class I Areas. Looking at cumulative emissions, monitoring data was analyzed to show a statistical correlation between SO₂ emissions and sulfate deposition.
- The difference in trajectory analysis for Acadia National Park on days with worst visibility versus best visibility was substantial.
- The Vermont DEC did a factor analysis to identify source components. Eleven sources were identified as fractions of observed mass on best and worst visibility days.
- After analyzing source apportionment data, the report identified states that could contribute to visibility impairment.
- There is a relationship between the BART Control Strategies and other regulatory programs (Acid Rain, NO_x SIP Call, and PM_{2.5} NAAQS). Mr. Kleiman indicated that states need to be looking at how these programs interact.

Participant comments and questions included the following:

- John Kinsman (Edison Electric Institute) reminded those present that the BART rule was proposed and not final.

- Jim Murphy questioned the identification of sources affecting MANE-VU Class I areas. Significant discussion occurred regarding the source apportionment bar graph. Mr. Murphy questioned why no MANE-VU sources were identified in the chart. He asked for clarification on source names, such as the Midwestern Coal source. Mr. Kleiman indicated that it was given the title purely for naming purposes and did not tie in specifically with a source. Mr. Murphy further asked, why label it “Midwest” when it could be anywhere in the region? Mr. Kleiman responded that geographical associations were based on trajectory analysis performed subsequent to the source apportionment analyses.
- Mr. Murphy asked if any mobile sources were identified. Mr. Kleiman answered that nitrates and carbon are partially a result of mobile sources.
- Mr. Murphy asked for clarification of why sources were named winter versus summer coal. Mr. Kleiman answered that sulfate to selenium ratios are linked to rapid or slow oxidation. Rapid oxidation is most common in summer.
- Bruce Hill asked if NESCAUM was planning cluster analysis. Mr. Kleiman answered that it is complicated, but that is a possibility down the road.
- John Paul asked, what the zinc source was. He mentioned there was a smelter that may have been shut down within the period studied (1992-1999). John Paul mentioned that there might also have been other changes that would show different source influences. Mr. Valentinetti indicated that the data has to be examined over the long term. John Paul asked if anyone had looked at the more recent data? Mr. Valentinetti indicated he would like to look into that.
- John Paul commented that sources could be from anywhere along a trajectory. Mark Saeger (PES) asked what time period was represented by the trajectories. Mr. Kleiman answered that they were calculated for 72 hours. He also mentioned that with regard to Mr. Kropp’s written comments on the first haze report, a single trajectory, by itself, cannot be used to identify a source.
- Mr. Kleiman noted that the report had gone through a second printing to correct a data error, and the most recent version was available on the NESCAUM web site. The third page (inside cover) of the corrected report was labeled “second printing.”

In the afternoon, Jim Murphy (Allegheny Energy Supply) presented “Feedback on BART-Eligible Sources.” He made the following points:

- It is too late to request comments after a report is complete.
- The report should have included inventories of other source categories subject to BART.
- Not all EGU sources identified are BART-eligible (e.g., some parts of the Mitchell Power Station are too old to be BART-eligible).

- The potential emissions reductions calculated are too large because the broad application of a percent control ignores a case-by-case approach, which will result in less control.
- He strongly objects to any level of presumptive control under the BART rules. There is no demonstrated need for presumptive control to achieve reasonable progress goals.
- Mr. Murphy asked whether MANE-VU or OTC was submitting comments to EPA on adoption of presumptive NO_x BART. He said MANE-VU should not use EPA funding to comment on an EPA document. Mr. Carhart answered that the BART report was the focus of the work of the grant, and the MANE-VU comments on EPA's proposed BART guidelines only used the BART report as an attachment.

Comments and questions on Jim Murphy's presentation included the following:

- Industry does not accept the trajectory paths cited by MANE-VU. MANE-VU needs to consider all of the sources along the path of trajectories that pass over many urban areas. It is not fair to blame the end point. Mr. Kleiman responded that the NESCAUM/MANE-VU analysis does not assume the endpoint of a trajectory is to blame for the integrated emissions along the trajectory. Rather, we assume that the integrated emissions along the entire length of the trajectory contribute. With no way (using Lagrangian trajectory models) to distinguish which segment of the trajectory is responsible for the majority of the emissions, we set an objective criteria (5% of poor visibility days) for associating geographical regions with some degree of responsibility for haze at class I areas. If any part (endpoint or otherwise) of several trajectories on poor visibility days passes over a region (state), there is some basis for considering that region (state) as a potential source of emissions that may cause or contribute to the formation of regional haze. No area was implicated on the basis of a single trajectory.
- Bruce Hill commented that presumptive NO_x BART controls are a good starting point not a requirement.
- Adding SCR to LNB can dramatically escalate cost/ton of NO_x control. There is wide variation between sites.
- BART requirements would be significantly beyond established NO_x requirements. How would that play? Jim Murphy indicated that the NO_x emissions reductions estimates in the BART report considered all sources (BART-eligible and BART-ineligible).

Fred Eames, attending the meeting to represent the FirstEnergy Corp, indicated that he had a prepared statement on this report. However, he indicated the comments closely followed those presented by Jim Murphy and would therefore prefer to submit feedback in a written format (see posted comments).

Source Apportionment of Air Quality Monitoring Data

Serpil Kayin (MARAMA) presented on "Source Apportionment of Air Quality Monitoring Data." Ms. Kayin explained that this report was funded by both MANE-VU and the Midwest

RPO, a collaboration that they are proud of and wish to continue. The purpose of this report is to help identify source types and regions affecting Class I Areas in the Eastern United States and to differentiate between source types and regions associated with the 20% best and worst visibility days. Through the course of her presentation, Ms. Kayin noted several key points, results, and clarifications regarding the report:

- Ms. Kayin explained the purpose, theory, and usefulness behind source apportionment analysis.
- This report is part of a multi-phase study. This report describes the data and data validation process, trend analyses of key species, assessment of the 20% worst visibility days at each site, and a review of existing source profile data.
- The second report will be out by the end of the year, with a draft available for comment in late fall. This report will summarize all results for each site for all days and the 20% worst visibility days to help identify the sources most associated with reduced visibility.
- Additional work will most likely follow the second report.
- Ms. Kayin is requesting feedback on source apportionment techniques, trajectory analysis techniques, source identification approach (number, how named, etc.), and source profiles.

Participant comments and questions included the following:

- Frank Divita asked if doing chemical mass balancing was being considered. Ms. Kayin answered that source profiles were not available for sources in the East to support CMB modeling. The existing source profiles were primarily developed for the West.
- A participant asked, “What is a source profile?” Ms. Kayin answered that it is the chemical recipe for emissions. Emissions contain certain ratios of elements and species or compounds.
- John Paul asked about the results of the study. Ms. Kayin explained that the results and analyses would be presented in the second report.

In the afternoon, Edward Kropp made the following prepared point regarding this report:

- Mr. Kropp said that his organization is concerned with analysis dealing with secondary organics. Sonoma did a peer review on this—how is this being handled? Ms. Kayin responded that this issue is pertinent to the second report, which is in process, and Sonoma’s work is being taken into account.

Work Plan for Surveys to Determine Residential Wood Combustion and Open Burning Activity

Tara Marie Koback (MARAMA) presented a summary of the report “Work Plan for Surveys to Determine Residential Wood Combustion and Open Burning Activity.” Before she began the

presentation, Dick Valentinetti indicated that MANE-VU is looking for the participants' early ideas on this topic, as residential wood combustion and open burning activity will both be big, upcoming issues. Ms. Koback began by stating the purpose of the project is to help states develop activity data and emission inventories for residential wood combustion and open burning source categories. This report outlines the development of survey instruments to collect data on the amount of burning. Through the course of her presentation, Ms. Koback noted several key points, results, and clarifications regarding the report:

- Activity data is needed to improve the emissions inventory.
- Some previous survey work had been done (CARB, UC Berkley). The survey design was developed to minimize operator error by using a telephone interviewing approach.
- An open burning survey would be conducted on officials who issue permits, and a residential wood combustion survey is of members of the public.
- Due to the seasonality of residential wood combustion, timing of the survey would be key.
- The activity survey for open burning would be followed by the development of an inventory, which will be subject to review by the states and tribes.
- The work plan for the residential wood burning survey is still draft. Ms. Koback noted that for this survey, they would also be looking at the differences between rural and urban areas.
- Feedback is being requested on the importance of these sources, the use of surveys, and comments on the approach.

Participant comments and questions included the following:

- Bob Bessette indicated that the report missed one issue—electricity costs. The rise and/or fall in electricity costs would affect the resident's decision to choose heat or the fireplace to warm their house as temperatures fall. Ms. Koback indicated that this is not in the EIIP method, but it is an issue to be addressed. She further stated that the correlation to natural gas prices could be examined as well.
- A participant asked about the surveys—would they ask about the amount of wood burned? How do you relate wood burning to visibility issues? Ms. Koback answered that the primary focus is on accumulating data to develop emission inventories for residential wood combustion and to assist the states with their SIP planning. Mr. Valentinetti added that it is important to look at the data to determine if a relationship exists between wood combustion and visibility. These data will also be useful for modeling applications.
- Bruce Polkowsky (NPS) said the survey should ask what type of equipment the resident used since this could be useful in future analyses.

- A participant stated that from a resource allocation standpoint, it would make sense to focus on larger sources. Mr. Valentinetti answered that MANE-VU has not made resource allocation decisions yet.
- Jim Houck, a consultant who was unable to attend the meeting, submitted written comments on the survey of residential wood combustion. His comments are posted on the MANE-VU website.

Discussion of Process

Dick Valentinetti distributed a sheet that included the following three concepts for discussion:

1. Stakeholders need to have an opportunity for involvement in MANE-VU activities.
 - Has this meeting been useful?
 - How could this type of meeting be modified to make it more useful?
 - What sorts of activities/issues would be useful to consider?
 - Should MANE-VU have periodic meetings of this sort or some alternative sorts of meetings or conferences?
2. There needs to be an opportunity for stakeholders to comment on MANE-VU technical documents.
 - How should such a comment period work?
 - Should MANE-VU put this on the MANE-VU website?
 - Should there be a stakeholder mailing list? How long a comment period is appropriate?
3. Stakeholders need to be able to access MANE-VU activities.
 - All MANE-VU meetings are public. MANE-VU committee meetings are public. MANE-VU is also considering broader programmatic meetings. What other suggestions are there for augmenting this approach?

He also outlined several steps that could help improve the process:

- Improve communication with stakeholders by enhancing the MANE-VU web site to allow interaction with stakeholders on issues and posting documents related to visibility.
- View reports as living documents.
- Focus on obtaining agreement on inter-RPO issues.
- Learn more about work conducted by stakeholders.

Stakeholder Involvement Efforts

Edward Kropp said that his organization's members are concerned about the following issues: 1) There are lawyers who are technically competent and are able to contribute at meetings. 2)

Stakeholders are spending a lot of time on calls and meetings in various regions. 3) A vehicle is required to receive input from organizations. There should be a process beyond the technical process to consider comments on policy determinations. Dick Valentinetti answered that technical issues influence policy decisions, and that the current focus was on technical issues.

A participant commented that meetings should be scheduled further in advance and stakeholders should be notified as soon as possible after a meeting is scheduled. Susan Wierman and Bruce Carhart both responded that e-mail notification is the way to go to keep everyone in the loop. Stakeholders should notify MARAMA or MANE-VU to be included on an e-mail list. William Butler pointed out that the website should allow for interested parties to subscribe to an e-mail list.

Interest was expressed in developing the MANE-VU website to allow for an on-line exchange of information, comments, and suggestions. In effect, this would be a virtual working group. The group agreed this might keep work moving and remove some of the logistical concerns regarding face-to-face meetings.

A participant commented that MANE-VU could hold conference calls with stakeholders on one or two key technical topics. He added that MANE-VU should task speakers for these calls to prepare and send their presentations to call participants ahead of the call. Videoconferencing was also discussed as an alternative to face-to-face meetings.

Involvement in the Technical Process

Edward Kropp would like to be involved in the technical work earlier rather than relegated to commenting on reports completed by MANE-VU. Dick Valentinetti answered that this was a valid issue and the MANE-VU technical committee was beginning to develop new methodologies for involving stakeholders in the technical process.

Mr. Kropp also commented that a separate stakeholder meeting should not be necessary. Dick Valentinetti responded that MANE-VU was looking at participation of stakeholders in technical meetings. The direction from the board is to focus on technical issues first.

Bob Bessette commented that the original OTAG process did not distinguish industrial boilers from utilities. That distinction should be made up front in the technical process.

John Paul (CEED) said that MANE-VU needs to develop a mechanism to allow interaction on technical issues before they become policy. Dick Valentinetti agreed that it is important to build bridges on the technical issues--including stakeholder input--and then make progress on other issues. He noted that MANE-VU's main objective in developing a technical process is to improve the scientific basis of efforts to meet the requirements of the regional haze rule.

Bruce Polkowsky commented that a detailed year-by-year plan for the technical process could clearly define the roles of all stakeholders and activities that are inherently government functions.

Current Comment Process

Edward Kropp commented that MANE-VU was the least stakeholder-friendly of all the RPOs. For example, four stakeholders submitted letters with comments on these reports already. MANE-VU did not extend the courtesy of asking any of these four stakeholders if September 19 was a good day to come to Washington, D.C. for a meeting.

Edward Kropp said the MANE-VU should move away from what has become a process of responding to responses. Dick Valentinetti reemphasized that the technical reports are living documents and that this meeting was intended to see how the interaction to date could be improved.

Dick Valentinetti then asked the participants for input on the length of the comment period for reports. He noted that MANE-VU does not want a long comment period that delays submission of reports to EPA. A participant said that the length of the comment period should depend on the document. Another added that the more involvement stakeholders have with the development of reports, the shorter the comment period. A participant said that when a draft document is posted on the MANE-VU web site, stakeholders should be notified through an e-mail list to allow them comment.

Involvement in MANE-VU Technical Work Planning

A participant asked if grant applications are available for comment. Bruce Carhart indicated he would check into this. Dick Valentinetti asked that all private entities also keep MANE-VU aware of work that they might be doing so collaboration is maximized.

A participant asked what type of work MANE-VU was doing so stakeholders can follow up. Susan Wierman responded that the RPOs are coordinating modeling, monitoring, data analysis, and emissions inventories.

Bruce Polkowsky said that participation in the planning process would help the National Park Service with its work projections.

Legal Issues

Jim Collier pointed out that the impact of pending lawsuits needs to be addressed. Similarly, Bruce Polkowsky indicated that the role of environmental groups needs to be clarified, as this is an issue faced by all RPOs.

RPO Collaboration

Bruce Polkowsky commented that information sharing among RPOs is of particular importance in the East, because of transport issues. Dick Valentinetti answered that the point of the inter-RPO work groups is to provide efficiencies wherever possible. There are different cost efficiency needs among the RPOs. It does not make sense for the five RPOs to pay for the same product five different times. MANE-VU is seeking to combine projects where it makes sense to avoid duplication of effort.

John Paul commented that he would like to see the workload duplication issue across regions resolved. He believed there was too much overlap in workload among regions. MANE-VU should address this issue. MANE-VU should also look beyond the technical and initiate a policy dialogue. Dick Valentinetti answered that MANE-VU is currently “muddling through” a lot of logistical issues. As the process progresses these types of issues will get solved. The current focus is on achieving better coordination.

Dick Valentinetti suggested that the term “concerned parties” might be better than “stakeholders.”

Many parties expressed a desire for a common RPO web site. Dick Valentinetti indicated that EPA has expressed an interest in doing this, however, he feels this may be a task that is better handled by the RPOs.

Other Stakeholder Issues

Jim Collier said that Earth Justice is an organization that should be involved in the process. Dick Valentinetti said that MANE-VU is interested in involving people with all areas of expertise.

A participant asked when the next report is due out. Susan Wierman answered that the second source apportionment document is due in late fall 2001 and technical memos may be released for comment later this year.

Adjournment

Jim Murphy, John Paul, and Skipp Kropp expressed their appreciation to MANE-VU for having this meeting. John Paul indicated that Dick Valentinetti appeared to be addressing a lot of his concerns about lack of stakeholder involvement.

John Paul (CEED) said that CEED would submit written feedback on stakeholder process issues. Written comments were also anticipated from Edward Kropp (MOG/Jackson & Kelly).

Dick Valentinetti asked participants to submit feedback on the meeting by September 21.