

Emerging Issues Subcommittee

AAQTF Meeting
Indianapolis, Indiana
October 3, 2007

Subject to be discussed: Emission Factor Uncertainty Assessment

Background Information: See attached Summary Report Presented to AAQTF at Indianapolis meeting

Recommendations:

The Task Force requests that these recommendations be transmitted through the Secretary of Agriculture to the EPA Administrator in an expeditious manner because of the Uncertainty Assessment October 31, 2007 comment period deadline:

1. That EPA submit their Emissions Factor Uncertainty Assessment through Notice and Comment Rulemaking, and that they accept comments regarding all aspects including implementation of this Assessment prior to their approval of the Assessment document. The Assessment represents a significant change to emission factor determinations, and is almost certain to have a dramatic impact on the interpretation of and the application of regulatory requirements. As such, not sending Assessment formally out for notice and comment as a regulatory change circumvents the current notice and comment approach to rulemaking.

2. That the EPA Science Advisory Board (SAB) new advisory panel (adopted pursuant to Sec. 72 Fed. Reg. 35463, 6/28/07; formed in response to a request

by EPA's Office of Air and Radiation) that has been formed to examine emission factor uncertainty, be allowed to review the "Emissions Factor Uncertainty Assessment" document prior to EPA's full consideration of this document, as well as to examine the implementation implications of this Assessment.