

**ENVIRONMENTAL MANAGEMENT COMMISSION
AIR QUALITY COMMITTEE MEETING SUMMARY
October 9, 2018
Archdale Building-Ground Floor Hearing Room
10:00 AM - 11:30 AM**

MEETING BRIEF

During their October 9, 2018 meeting, the Air Quality Committee (AQC) of the Environmental Management Commission (EMC):

- Received request for approval to proceed to EMC for public comment and hearing on readoption of Group 4 Rules – 15A NCAC 02D .0540,1800-.1808, .1900-1907.
- Provided comments for Division of Air Quality (DAQ) to consider as they prepare for the November EMC meeting.
- Received an update on the Proposed “Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule.

AQC MEMBERS IN ATTENDANCE

Dr. Stan Meiburg, AQC Chairman;
Mr. Gerard Carroll;
Ms. Marion Deerpake;
Dr. Suzanne Lazorick;
Mr. George H. Pettus; and
Julie Wilsey, EMC Vice-Chair

OTHERS IN ATTENDANCE

Ms. Shannon M. Arata;
Mr. David W. Anderson, EMC;
Mr. Steve Keen, EMC;
Mr. William “Bill” Puette, EMC;
Dr. Albert R. Rubin, EMC;
Mr. Philip Reynolds, EMC Counsel;
Mr. Mike Abraczinskas, DAQ Director;
Mr. Michael Pjetraj, DAQ Deputy Director;
DAQ Staff; and
Members of the public

PRELIMINARY ITEMS

Agenda Item #1, Call to Order and the State Government Ethics Act, N.C.G.S. §138A-15(e)

Chairman Meiburg called the meeting to order and inquired, per General Statute §138A-15(e), as to whether any member knows of any known conflict of interest or appearance of conflict with respect to matters before the Environmental Management Commission’s Air Quality Committee. No conflicts were identified.

Agenda Item #2, Review and Approval of the July 11, 2018 Meeting Minutes

Chairman Meiburg inquired if everyone had been able to review the minutes from the July meeting and if there were any changes or corrections. No changes were cited. Chairman Meiburg asked for a motion to approve the July 11, 2018 minutes. Following motion to approve the minutes it was seconded, and the July minutes were unanimously approved.

RULEMAKING CONCEPTS

None.

DRAFT RULES**Agenda Item #4, Request Approval to Proceed to EMC for Public Comment and Hearing on Readoption of Group 4 Rules - 15A NCAC 02D .0540, .1800-.1808, .1900-.1907 (546) (Joelle Burleson, DAQ)****Description:**

Ms. Burleson presented the request to proceed to the EMC on the readoption of Group 4 Rules 15A NCAC 02D .0540, Particulates from Fugitive Dust Emissions, .1800, Control of Odors, and .1900 Open Burning rules. On July 11, 2018, the AQC withdrew this agenda item to incorporate two Session Laws (S.L.) and to address comments from the Rules Review Commission. This is the fourth of the six groups of rules for the H74 Readoption process, and the DAQ will provide the Committee updates as they proceed to the Group 6 rules next year.

Rule 02D .0540 went through the stakeholder process and after addressing comments, this rule is proposed for readoption with substantive changes to clarify definitions, update exemptions and requirements related to fugitive dust control plans, and to revise the formatting of references according to the Administrative Procedures Act (APA).

Rules 02D .1801, .1803, .1804, .1807, and .1808 are proposed for readoption without substantive change. Only procedural, administrative and technical changes were made to these rules. Rule 02D .1802 is proposed for readoption with substantive changes to remove obsolete rule language, to amend rule language to provide some clarification, to redefine items that constitute a plan failure for a best management plan, and to make administrative and technical changes. Rule 02D .1806 is proposed for readoption with substantive changes to clarify rule language, remove obsolete text, remove older language that no longer applies, to add a provision for an extension request, to add an intermediary step prior to the requirement of maximum feasible controls (MFC), and to add an exemption for products that are (i) grown, produced, or generated on one or more agricultural operations and (ii) "renewable energy resources," per S.L. 2017-108.

Ms. Burleson stated that she received correspondence from Committee members throughout the Group 4 rulemaking process and presented a complaint process timeline graphic to address questions regarding objectionable odor determination and the complaint process.

Rule 02D .1901, .1906, and .1907 are proposed for readoption without any substantive changes. These changes include formatting of citations according to the APA and updating county office names. Rules 02D .1902, .1903, and .1904 are proposed for readoption with substantive changes to remove obsolete definitions, add clarifying rule language, update language to reflect current procedures, modify rule language to make it consistent with new federal Emission Guidelines, delete outdated language, and to make other administrative changes. Rule 02D .1905 is proposed for amendment to update Regional Office addresses.

Ms. Burleson specified that stakeholders provided comments on the cost of obtaining a Title V permit for air curtain incinerators (ACIs), recommendations on reporting requirements for the odor rules, and the proper units for steady state live weight.

Ms. Burleson also noted that ACIs may be subject to any of the following federal rules: 40 CFR 60, subpart AAAA, BBBB, CCCC, DDDD, EEEE, or FFFF. Most ACIs operating in NC will require a Title V permit, with the only clear exception being for temporary units used for disaster recovery purposes. The DAQ is currently developing a general Title V permit for ACIs. Other requirements in the rules include: notification requirements

for ACIs used for disaster recovery longer than eight weeks, 10% opacity limit during normal operation; 35% opacity limit during startup (first 30 minutes of operation), and initial and annual opacity testing. She also mentioned that currently there are six permitted ACIs in NC. The ACIs vary in dimension and are able to burn 10-20 tons per hour. However, there are limitations on burning time, how much material can be put in the pit, moisture content, and type of material can impact how much they can actually burn. She noted that, based on the regional staff, they can burn up to 35 ton per hour. She stated that last year the ACI throughput ranged from 0 to 3,500 tons per year with a total of 4,595 tons per year.

Ms. Burleson presented changes to the fiscal note and noted that it was approved by the Office of State Budget and Management on Friday, October 5, 2018. She noted that the changes incorporate an exemption of renewable resources and incorporate the provisions of Session Law 2018-114, Regulatory Reform Act of 2018, Section 13, that reduces the Title V fee for air curtain incinerators to 10% of the otherwise applicable fee. The Private sector impact reflects the incorporation of the federal Emissions Guidelines and the increased fees for obtaining a General Title V Permit, where the impacts are estimated to range from \$0 to \$3,936 in the first year and \$0 to \$2,768 for subsequent years depending on the compliance path for the facilities. To comply with the federal requirement the air curtain incinerator General Title V Permit fee in S.L. 2018-114 requires implementation in the interim until the EMC adopts the specified change to its permit fee rule 15A NCAC 02Q .0203, which will come before the Commission at later time as separate rule making process, it has already been through readoption process.

Ms. Burleson presented a reference to S.L. 2017-108 which contained the actual language that required the DAQ to implement the 02D .1806(d)(11) change. The definition of “renewable energy resource” referenced in the Session Law is broad and is defined in North Carolina’s Renewable Energy and Energy Efficiency Portfolio Standard.

Ms. Burleson presented that the proposed exemption criteria consists of proactive inclusion of measures for minimizing odor in permit and the 02D .1806(d)(11) change allows flexibility to use site specific measures to address site characteristics that can impact the odor and it provides transparency by placing it in the permit and the cost impacts can be expected to be minimal.

Ms. Burleson concluded the Group 4 agenda by going over the next steps. She mentioned Group 4 will be back in November to request to proceed to comment and hearing at the EMC.

Discussion:

Chairman Meiburg asked if there were any other questions for Ms. Burleson.

Commissioner Deerhake noted that the timeline was very helpful, proposed that it should be included during the public hearing process. She raised concern that the step between submitting odor management plan (OMP) and a revised OMP is not clear. She asked if the graphic could contain processing time for the state and processing time for the applicant. She accounted a quick estimate, for the 1st odor determination an approximate 28 months to install a MFC, for the 2nd odor determination approximately 27 months to install a MFC. She asked if that is State is comfortable justifying two-year timeline to take action. Ms. Burleson responded that she believes that there is nothing in the Rules that precludes it from occurring more quickly, only that it allows for time need to plan and install a MFC. The intermediary step was added to allow for complaints to come to resolution quicker that can be addressed quicker.

Commissioner Deerhake noted that it may be expressed as a timeline not to exceed. Chairman Meiburg responded that if that was a specific recommendation in respect to the rule that would go forward to the EMC. Commissioner Deerhake responded that she has to refer to rule to check to see if the language was clear.

EMC Chairman Solomon asked EMC General Counsel to make comments on consequences or ramifications of phrasing the timeline not exceed in the rule language. EMC Counsel Mr. Reynolds responded that generally not exceed will be tied to some consequence, however he would have look at the specific rule language.

Chairman Meiburg suggested to modify the chart to decision chart, yes versus no. He voiced concern that, not to spent too much time holding the topic up from going forward, but at Commission stage look into the concern and questions related to clarity of the rule language regarding compliant process timeline.

Director Abraczinskas thanked the Committee and noted the good discussion. He pointed out that, by stepping through the rule text it addresses the concerns raised by the Committee members. He also noted that the Department will incorporate comments regarding clarifying complaint process timelines.

Chairman Meiburg asked Commissioner Deerhake to hold additional questions on the overall packet until the end of the presentation.

Chairman Meiburg asked for brief description on what constitutes the making of an odor determination. Ms. Burleson responded that she believes that for NC, a determination is made after an odor complaint has been received and investigated. She also mentioned that the staff goes through periodic training on using the n-butanol standard and the use of their olfactory senses to detect odor intensity. Chairman Meiburg responded that to his point, as the rule package moves forward the Commission should consider in regard to the overall odor rule, the change from training and staffing standpoint.

Commissioner Pettus asked if odor logs are still being utilized Ms. Burleson responded that she believes odor logs are used to track the complaints.

Chairman Meiburg asked if these air curtain incinerators have operated in response to Hurricane Florence. Ms. Burleson responded that there an exemption for temporary operations. she believes that DAQ received 17 requests for burning related to Hurricane Florence. Chairman Meiburg responded that instances of burning request due to vegetation and agriculture debris. Ms. Burleson responded with a clarification that they are only allowed to burn clean biomass.

Chairman Meiburg asked if DAQ will run into difficulty on the Title V approval by virtue of reducing the fees for this one particular source categories. Ms. Burleson responded that she believes the answer to be a "no".

Chairman Meiburg specified that the facility owner or operator identified the source of potential odors and specify odor management practices in their permit. He asked if the facility owner or operator would be in violation of their permit if the facility does not conduct the odor management practices. Chairman Meiburg also asked whether the language mirrors state law. Ms. Burleson affirmed that was the case."

Commissioner Deerhake noted few remarks on the overall packet. She provided her background and interest in the odor rules. She stated that she has been following this very closely, she also stated that back in the 1990's, the EMC was mandated to adopt animal odor rules, and that she and the late Dr. Robert Cook of NC State were hearing officers. She mentioned that when the package came before this Commission, she went back and reviewed the history of this rulemaking and was thankful to the DAQ staff for phone conversation to refresh her memory on the reasoning behind pervious language and discuss the proposed changes that before the Committee today.

Commissioner Deerhake pointed out that Rule 02D .1802, .1803 and .1804 deals with animal operations and the odors associated with animal operations. she reminded the Committee that the main driver behind the original odor rule was to address the concern for aesthetic and potential health effects from the exposure to these odors from animal operations. She also pointed out the directive to the Commission was to develop standards for the

liquid animal waste management systems. She also noted that it's not within the scope of the directive to the EMC to address dry waste or dry manure or litter for these rules, however the people that neighbor these poultry operations are worried about exposure from odor from those facilities and their concern would have to be addressed by separate efforts, she suggested the legislature should to address those concerns. She also pointed out that there has been legal action addressing environmental justice cases associated with the exposure to odors from animal operations and they are still being addressed by the courts and even though it is a separate activity that currently doesn't influence this rule making at this stage but perhaps it will later.

Commissioner Deerhake pointed out that the Rule 02D .1803 contains language referencing best management plan in regard to odor management, which causes confusion to the agriculture communities. Agricultural communities are familiar with best management practice when dealing with odor issues and these practices includes technology or practices that control various types of water and air quality issues. She noted that it would be interesting to see if there are any comments related to these concerning areas. She also pointed out the 02D .1806 complaint timeline diagram was very useful, and she would like to see similar diagrams or overall decision-making steps diagram be developed for the animal odor rules for the public hearing process.

Commissioner Deerhake asked if there has been a review of new technology for odor detection by DAQ. Ms. Burleson responded that Gary Saunders evaluated the available technologies and determined that cost constraints and applicability of the technologies are not viable for the state. Chairman Meiburg noted that they maybe used a supplement, due to reasons of cost and their ability to characterize odor intensity is not replacement to staff determination. Ms. Burleson affirmed that was the case.

Chairman Meiburg noted that the concern of time gap between odor complaints and actual odor determination, the proposed rule change was going to address that issue.

Commissioner Deerhake pointed out that the current compliant system is not working because the public has turned to litigation instead of using the compliant system. She would like to see complaints and odor determination data from the rule effective year 2000 made available for the public hearing process. Director Abraczinskas affirmed that the data associated with complaints and substantiated complaints will be part of the public record.

Commissioner Pettus asked if Commissioner Deerhake was asking about all odor complaints or groups. Commissioner Deerhake responded that she is asking about complaints associated with Rule 02D .1802, .1803, and .1804. Chairman Meiburg asked if the department distinguishes compliant by rule, or type of compliant. EMC Chairman Solomon pointed out location would be important to. Ms. Burleson responded to the questions and said that she would have to look at the different data that is collected. Chairman Meiburg summarized questions by stating the Committee is asking to include records of complaints, location information and all available data based on the compliant be made available. The Committee members affirmed. Director Abraczinskas affirmed that the data will presented in the November meeting.

Commissioner Deerhake asked EMC General Counsel to prepare comments for the November meeting about rule 02D .1806(d)(11) exemption if that exemption applies to anaerobic digesters.

Commissioner Deerhake asked for clarification on roofing materials that's covered in 02D .1903(b). She stated that many open burning cases never seems to go away and thanked the staff for working hard.

Motion:

Chairman Meiburg asked if there were any other questions for Ms. Burleson. No questions were identified. Chairman Meiburg asked for a motion to proceed to EMC for public comment and hearing on reoption of Group 4 Rules. Commissioner Carroll made a motion to approve the minutes and Commissioner Lazorick seconded. The agenda item was unanimously approved.

INFORMATION ITEMS**Agenda Item #8, Update on Proposed “Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule” (Mike Abraczinskas, DAQ)**

Director Abraczinskas thanked Chairman and Committee, noted he will be presenting brief remarks on the EPA proposal that the DAQ was currently in the process reviewing. He noted that the DAQ is working through documents and technical analysis to prepare comments back to the EPA in regard to the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule proposal for model year 2021 to 2026 that came out late August.

The action is a joint proposal between NHTSA and EPA adjusting both the Corporate Average Fuel Economy (CAFE) standards and the carbon dioxide (CO₂) emissions standards for passenger cars and light trucks.

The proposed SAFE rule adjusts both the CAFE standards and the CO₂ emissions standards for passenger cars and light duty trucks for vehicle model years (MY) 2021 through 2026.

The rule also includes a proposal to withdraw the waiver of Clean Air Act (CAA) preemption for California's standards applicable to model years 2021-2025 passenger cars and light duty trucks. Under the Clean Air Act, California is the only state that may set its own vehicle emission standards; however, other states may adopt California's standards.

The NHTSA is proposing new CAFE standards for MY 2022-2026 and amending the 2021 MY CAFE standards because they no longer consider them maximum feasible standards. EPA is proposing to amend its CO₂ emissions standards for MY 2021-2025 because, based on its Mid-Term Evaluation Final Determination issued April 2, 2018, they are no longer appropriate and reasonable and is establishing new CO₂ standards for MY 2026.

NHTSA and EPA are considering and seeking comment on a range of alternatives; however, the agencies' preferred alternative is to retain the MY 2020 standards established in 2012. They find that the preferred option reflects a balance of safety, economics, technology, fuel conservation, and pollution reduction between the requirements of the two agencies.

In their analysis of the proposal, a key premise driving a net benefit calculation is that additional sales of newer vehicles under the preferred option are safer by virtue of maintaining the 2012 vehicle footprint or size-based target curves.

The proposed rule preferred option would require a 37-mpg projected overall industry average required fuel economy for MYs 2021-2026 vehicles compared to a 46.7 mpg fuel economy required in MY 2025 by the 2012 standards. This would represent a 0.5 million barrel per day or 2-3% increase in U.S. daily fuel consumption according to the Energy Information Administration. According to the agencies, there would be no noticeable impact to net emissions of smog-forming or other “criteria” or toxic air pollutants. The agencies purport the preferred alternative would prevent thousands of on-road fatalities and injuries relative to the 2012 rule and improve vehicle affordability leading to increased use of newer, safer, cleaner and more efficient vehicles. It is estimated to result in greater than \$500 billion reduction in societal costs and reduce highway fatalities by 12,700 lives over the lifetimes of the vehicles through MY 2029.

In addition to the preferred alternative, the proposal requests comment on options including fuel economy increases ranging from 0.5% per year for both passenger vehicles and light trucks up to 2% per year for passenger vehicles and 3% per year for light trucks and passenger vehicles.

The DAQ staff is currently in the process of reviewing the proposal and key assumptions of the supporting materials to develop and submit comments on the proposal during the comment period. The comment period on the proposal closes October 26, 2018. Staff has noted major changes from previous analyses methodologies and assumptions resulting in the agencies' justification of its preferred regulatory alternative and is seeking to evaluate and vet the reasonableness of those assumptions.

Some potential concerns initially identified include: the potential for impact on state implementation plan (SIP) obligations and transportation conformity that may need to be revised due to changes to the standards not being reflective of assumptions used in past demonstrations and the associated resource demands for involved agencies and organizations; the potential for impact to air quality as a result of changes in the fleet mix and associated emissions standards resulting from the proposed preferred option if it were to be finalized; and the reasonableness of the underlying technical basis and key assumptions such as a large increase in projected fleet size and that new vehicle sales are indeed safer, that were used to support selection of the agencies' preferred option.

The DAQ made requests for an extension of the comment period to allow adequate analysis of the significant, rather large, complex rulemaking and its potential impacts have been submitted by North Carolina and other entities. Further updates on this matter can be provided at a subsequent Committee meeting.

Discussion:

Chairman Meiburg thanked Director Abraczinskas, stated that he asked Mike to make this report. He noted that this topic has been in the news and he wanted to bring it to Committee's attention and he believes that state should consider in regard to SIP planning that Director mentioned in general. He noted the ambiguity in assumptions made in this proposed rulemaking, some in the cost benefit side, and some in the projection of the automobile safety standards. He noted that California objected strongly to the notion that their waiver ought to be rescinded. He predicted litigation cases on this in near future.

Commissioner Carroll asked if the state tracked CAFE fuel efficiency performance standards. Director Abraczinskas responded that he believes that it's managed at the federal level and at the manufacturing sector. Commissioner Carroll asked whether the state working on a plan to meet the federal regulations or requirements. Director Abraczinskas responded that the DAQ is not currently working on a plan to meet federal requirements.

Commissioner Lazorick asked if there was any informational graphic that was available that summarized the complexity for this topic. Director Abraczinskas responded that he believes that EPA has generated material which is posted on its webpage, but the DAQ has not generated anything yet, currently DAQ is getting handle on all the various components.

Commissioner Carroll asked if North Carolina was planning to join other States in regard to litigation related to this topic. Director Abraczinskas responded that North Carolina is not an opting state, and currently the State doesn't have any position on the topic. Chairman Meiburg responded that historically, this hasn't been an issue for some time, California and EPA standards were moving parallel since 2009 until this action diverging them. Commissioner Deerhake noted that North Carolina has followed California in the past, one example she used was the heavy-duty diesel rule, she mentioned it has been repealed. Director Abraczinskas affirmed that was the case and mentioned that federal rules have caught up in both light and heavy-duty sectors.

Agenda Item #9, Director's Remarks

As update on air quality permitting, Director Abraczinskas mentioned that the Central Office Permitting Section is busy. He mentioned having 12 PSD applications and anticipating 6 more. He highlighted three topic areas of significant public interest and the DAQ allocated additional resources to review those permit applications. Of the three areas of interest, one is the wood pellet industry. Currently, the DAQ has applications in house for

three wood pellet manufacturing sites where additional emission controls are being proposed. These emission reduction projects are in various stages of the permitting process. Public meetings or hearings will be scheduled for each of these when we get to the draft permit stage. Second area is Chemours, we are working on the draft permit that will require the thermal oxidizer at the facility that will result in 99.99 percent control of the GenX and other PFAS emissions tied into that system. Overall, once this control technology is in place (scheduled for December 2019), GenX and Per- and polyfluoroalkyl substances (PFAS) air emissions will be controlled by 99 percent relative to a 2016 baseline. Third area is the log fumigation, we are continuing to hold all permit applications and actions on existing permitted facilities while we work with the AQC and EMC on rules to address the use of methyl bromide from log fumigation operations.

As update on the vehicle emissions inspection program, he mentioned effective December 1, 2018, emissions inspections will no longer be required in 26 counties. The removal of these counties from the inspection and maintenance (I&M) program was enacted in Session Law 2017-10, Senate Bill 131, of the 2017 session of the North Carolina General Assembly. This was after a study conducted by DAQ indicated that certain counties could be removed from the program without negatively impacting air quality or interfere with the attainment status of the National Ambient Air Quality Standards.

On September 28, 2018, the NC Department of Environmental Quality (DEQ) provided a letter to the Revisor of Statutes, certifying the Environmental Protection Agency's approval of the change. The Division of Motor Vehicle will handle implementation of the changes to the I&M program. It should be noted that all counties will still require the safety inspection.

As an update on NC Diesel Emission Reduction Act (DERA) grants, the North Carolina Division of Air Quality is accepting proposals to fund clean diesel projects through the Federal Diesel Emission Reduction Act (DERA) program. More than \$694,000 is available for eligible projects that can include things such as repowering non-road construction or agricultural equipment, converting vehicles to run on alternative fuels.

Individuals, businesses and organizations from the public and private sector are eligible to apply. Applications must be received via email no later than 5:00 P.M. on November 2, 2018 to be considered. More information on eligible projects and application instructions are available on our website.

Director Abraczinskas also provided the following updates on federal actions:

1. Safer Affordable Fuel-Efficient (SAFE) vehicles rule proposal – comments due by October 26, 2018.
2. On August 21, 2018, EPA released the proposed Affordable Clean Energy (ACE) Rule to replace the 2015 Clean Power Plan (CPP). The proposal establishes emissions guidelines for states to use in developing their own plans to address GHG emissions from existing coal-fired electric generating units. The proposed ACE rule has three primary components:
 - (1) The proposed determination that the Best System of Emissions Reduction (BSER) for existing coal-fired power plants is heat rate improvements, or efficiency upgrades, applied at the source;
 - (2) Changes to section 111(d) applicable to this action and future emission guidelines such as the amount of time a state has to develop and submit a plan (changing from 9 months to 3 years); and
 - (3) Revisions to the New Source Review (NSR) permitting program to allow power plant owners/operators to make efficiency improvements consistent with the proposed BSER without triggering NSR permit requirements. For example, the ACE rule makes it easier for EGUs to avoid triggering major source NSR permitting by establishing a new preliminary hourly applicability test applied at the EGU level, rather than changes in annual emissions.

Comments on the ACE proposal are due October 31, 2018.

3. NOx SIP Call non-EGU continuous monitoring proposal – comments are due October 29, 2018. This would impact continuous emissions monitoring requirements for those no EGUs, later opted in care rule.

Discussion:

Commissioner Carroll asked if we stop North Carolina's plan in response to federal action, or can we proceed with what we already developed, or do we have to now wait and not improve anything. Director Abraczinskas responded that, the plan Commissioner Carroll is referring to in response to CPP back in 2015, the Commission never took action on, before we could bring the plan to the Commission the supreme court stayed the CPP. To your questions Can we use some of that analysis potentially, not sure. Commissioner Carroll responded, in the absence of this new rule being finalized, can we precede with what we have already come up with or are we forbidden by doing that by state law. Director Abraczinskas responded that he believes that there might be some good technical reasons why with the state proceeding might not make sense. He gave example of many of the measures that was identified at the time in that analysis, for example unit by unit heat rate improvement analysis, along with others that have already occurred and are in place now, us taking inventory of those things will be part of the process. Right now, we are focusing on what does this proposal mean, what does it look like, how is it different, what is our point of view on it. There numbers of steps to consider and we can't make decision at this time.

Commissioner Lazorick asked if auto inspection that was just removed in 26 states, if the safe rule were to proceed, does that apply to vehicles enough that it can change the need for air quality emission inspection of cars to effect the inspection rule of cars that was just taken way in 26 states. Director Abraczinskas responded that he believes probably not, he mentioned that technology is continually improving on vehicles. He specified that an ill performing vehicle today is typically cleaner than a properly functional vehicle made 15 years ago. From EPA we learned that there is a diminishing return on annual emissions inspections over time. Technology has improved, components last longer, transitioning fleet to alternatives as well. You will see diminishing return on investment in regard to emissions inspection.

MEETING ADJOURNMENT

Chairman Meiburg asked for additional questions or comments, and upon hearing none, noted that the next meeting of the AQC would be November 7, 2018. Chairman Meiburg adjourned the meeting.