Potential Next Steps in CEWG Regulatory Engineering Project
Prepared by John Bartlit

BEGINNING BASICS

I suggest the next step(s) needed to make a regulatory engineering project that is useful to all interests could proceed as follows:

1. Participants must agree on the mutual goal of pursuing emissions tracking that is better, faster, and cheaper than we have now.
2. The meanings of "better, faster, and cheaper" need to be defined, be measurable, and be agreed on. The process for doing this is important and is possibly lengthy. The project on regulatory engineering may achieve no more than this, which in itself would advance the CEWG's mission to improve community dialogue.

DISCUSSION GOING FORWARD

I suggest a process as follows:

a) Intel provides relevant data on how many days of active stack testing are done annually. Say, X days annually.

b) Intel provides relevant data on how many days after a set of testing is completed before the results are known to the NMED and the community. Say, Y hours.

c) Intel provides relevant data on the amount they spend annually for regulatory compliance with their requirements for emissions testing. Say, Z dollars annually.

Together, these parameters—X, Y, and Z—are potential dimensions of "better, faster, and cheaper," respectively. The goal of being "better" may be defined by a significant increase in X, that is, a significant increase in the total part of the year that is covered by active stack testing.

The goal of being "faster" may be defined by a significant decrease in Y, that is, a decrease in the hours (or days) elapsed between active testing and when the community could know the results.

The goal of being "cheaper" may be defined by a significant decrease in Z, that is, a decrease in the dollars Intel spends annually for active stack testing.

The CEWG then seeks to reach agreement regarding these quantitative factors before going further. If agreement can be reached, we can proceed on to a next step to be decided. No special funding would be needed until that point is reached and perhaps not then.

If agreement cannot be reached regarding the quantitative factors, the CEWG may have gone as far as it can go on a regulatory engineering project. In this event, the benefit will be that all parties would have a fuller understanding of the human difficulties met at this time in trying to achieve practical improvements in current regulations.

FURTHER DETAILS THAT FIGURE IN

A number of other factors will or may turn up in discussion. A brief listing of factors brings to mind various aspects the CEWG group might examine:

* People may explore quantifying how much improvement is "significant" in each aspect.
* People may explore pros and cons of measuring a single "key component" to establish that the plant is running normally, rather than measuring every compound in the decades of testing data.

* People may want to explore automated signals to Intel or an agency to warn when agreed-on bounds are exceeded. Automated alarms to the community, which have come up often in the past, are not consistent with the authorities given to community emergency response personnel.
* The project might make the most progress if problems of gaining approval by the Air Quality Bureau (AQB) are set aside in the project. If agreements are reached, the project results can be presented by the group to the AQB for approval. The progress shown by the results could only help chances for approval.