

APPENDIX J
MODELING PROTOCOL

Appendix J

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MODELING/ANALYSIS PROTOCOL

The modeling/analysis protocol serves numerous functions including: (1) identifying the local (lead) air quality agency assisting the State with attainment analyses, (2) identifying methods and procedures used to support the demonstration, and (3) describing the review process applied to steps in the demonstration process (EPA, 1999). Although the protocol serves other functions, one of the most important is providing a means of planning and communicating the procedures to be used for demonstrating attainment.

Appendix J is divided into two parts. The first, Protocol Overview, lists key issues that are addressed in the local modeling/analysis protocol and describes the means used to fulfill protocol requirements. Part two of this appendix consists of the Modeling Protocol document provided to AACOG by ENVIRON International Corporation for development of the 1999 photochemical model.

PART 1: PROTOCOL OVERVIEW

Lead Agency

The local (or lead), agency assists the State with evaluating the analyses needed to support a defensible demonstration. For purposes of the SAER attainment demonstration, the lead agency is the Alamo Area Council of Governments (AACOG). Although AACOG is the local agency charged with emissions inventory development, photochemical model development, and other major components of the SAER attainment demonstration, the agency works closely with the state (Texas Commission on Environmental Quality) and federal (US Environmental Protection Agency) governments to ensure compliance with applicable guidance and regulations.

Stakeholders Participating in the Process

Local stakeholders participating in the protocol process include the Air Improvement Resources (AIR) Committee of the Alamo Area Council of Governments. Formed in April 1999, the mission of the AIR Committee is twofold: (1) facilitate the completion of the air quality studies and necessary planning activities for attainment under the new 8-hour average ozone NAAQS, and (2) develop a comprehensive emission reduction plan that will guide the region's actions to attain the 8-hour NAAQS. Furthermore, much of the technical and educational air quality activities conducted by AACOG are directed, reviewed, and approved by the AIR Committee. The Air Improvement Resources Committee is composed of five subcommittees as described below:

AIR Executive Committee

The AIR Executive Committee is comprised of members representing the major government organizations within the San Antonio Metropolitan Statistical Area defined according to data from the 1999 U.S. Census.¹ The following municipal and county

¹ At the time the Early Action Compact was signed, the MSA consisted of four counties: Bexar, Comal, Guadalupe, and Wilson. The bylaws of the AIR Committee state that "membership shall be extended to similar local governments brought into the San Antonio Metropolitan Statistical Area through US Census redesignations of the SA/MSA boundary." As recently as December 2003, EPA Region 6 Administrator Richard Greene affirmed that only this four-county region is recommended as the nonattainment area for the San Antonio region. Richard Greene's letter to Texas Governor Rick Perry, dated December 3, 2003, available online as: <http://www.epa.gov/air/oaqps/glo/designations/documents/03Recommendations/6/s/Texas_R.pdf>.

governments appoint one representative to serve on the AIR Executive Committee. The county government representative is an elected official serving as judge or commissioner. The municipal government representative is an elected official serving as mayor or city councilperson.

- Bexar County
- Comal County
- City of Floresville
- Guadalupe County
- City of New Braunfels
- City of San Antonio
- City of Seguin
- Wilson County

In addition, the following entities appoint one representative to serve on the AIR Executive Committee:

- Alamo Area Council of Governments Board of Directors
- Greater Bexar County Council of Cities
- San Antonio / Bexar County Metropolitan Planning Organization

During its five-year history, membership of the AIR Executive Committee has varied. Table J-1 provides a list of the AIR Executive members as of March 2004.

Table J-1. Executive (voting) Members of AIR Committee.

Agency	Representative
Bexar County	Nelson Wolff, Bexar County Judge
City of San Antonio	Ed Garza, San Antonio Mayor / Chip Haas, City of San Antonio Councilman
Comal County	Jay Millikin, Comal County Commissioner
City of New Braunfels	Adam Cork, New Braunfels Mayor
Guadalupe County	Donald Schraub, Guadalupe County Judge
City of Seguin	Ernest Hernandez, City of Seguin Councilman
Wilson County	Marvin Quinney, Wilson County Judge
City of Floresville	Raymond Ramirez, Floresville Mayor
Alamo Area Council of Governments Board of Directors	Patrick Heath, AACOG Chairman
Greater Bexar County Council of Cities	Marcy Meffert, Leon Valley Mayor
Bexar County-San Antonio Metropolitan Planning Organization	Julian Castro, City of San Antonio Councilman

AIR Advisory Committee

The AIR Advisory Committee acts as liaison between the AIR Executive Committee and the greater citizen sectors, both public and private. The membership of the AIR Advisory Committee includes the AIR Executive Committee membership. AIR Advisory Committee membership invitations are extended among the following groups and individuals, and others as determined by the Executive Committee, with all membership nominations made by members of the AIR Executive Committee and final approval for membership by vote of the AIR Executive Committee:

- Business representatives
- Environmental groups
- Education agencies
- Transportation organizers
- Utilities
- Industry representatives
- Chambers of Commerce
- Health organizations
- Neighborhood organizations
- Other elected officials
- Minority organizations

AIR Technical Committee

The AIR Technical Committee is composed of technical staff representing local governments knowledgeable of air quality issues. The committee provides recommendations and technical assistance on air quality technical issues to the AIR Executive Committee for planning meetings held by the AIR Executive Committee. The following local planning agencies are represented on the Technical Committee.

- AACOG
- Bexar County
- City Public Service (Utility provider)
- Comal County
- City of Floresville
- Guadalupe County
- Metropolitan Health District
- Metropolitan Planning Organization
- City of New Braunfels
- City of San Antonio
- City of Seguin
- Texas Commission on Environmental Quality (ex-officio)
- Texas Department of Transportation (TxDOT) District Office
- United States Environmental Protection Agency (ex-officio)
- Via Metropolitan Transit
- Wilson County

AIR Public Education Committee

The AIR Public Education Committee is charged with disseminating information about the ozone challenge through news media and public events. Its mission is to educate the public about local air quality problems and issues. The Public Education Committee makes recommendations to the AIR Executive / Advisory Committee on ways to increase media coverage of air quality issues and provide air quality information to the

general public. Membership of the AIR Public Education Committee includes representatives of local governments, utilities, and transportation organizations.

Off-Road Equipment Subcommittee

The AIR Off-road Equipment Subcommittee works with local industry to promote voluntary implementation of ozone control strategies and studies the impact of legislation and other legal issues on the off-road community. The Off-Road Subcommittee membership includes owners/operators of off-road equipment in the public and private sectors.

Alamo Area Clean Cities Coalition

Although the Alamo Area Clean Cities Coalition is not a subcommittee of the AIR Committee, the coalition encourages local governments and organizations to form public/private partnerships to develop markets for alternative fuel vehicles (AFVs). Clean Cities is a voluntary federal program funded by the U.S. Department of Energy to accelerate and expand the use of alternative fuels in communities throughout the country and to develop the necessary infrastructure for their operation.

Since 1996, the AACOG has supported the Alamo Area Clean Cities Coalition by hosting meetings, organizing awareness events, and developing project subcommittees that are chaired by members of the local community. As a regional planning organization, the coalition works to improve the quality of life in South-central Texas including the 12-county area surrounding the City of San Antonio.

Public Participation

Each meeting of each of the subcommittees of the Air Improvement Resources Committee system is open to the public. Although the AIR Technical Committee is a technical working group and is not a forum for policy development and action, the agendas of the regular meetings of this committee have always included a "Citizens to be Heard" item. In addition to a "Citizens to be Heard" item, the bylaws of the AIR Committee system allow citizens to address every action item on the AIR Executive/Advisory Committee agendas, guaranteeing the right of the citizens to voice their opinion prior to any vote by the policy development and action committee.

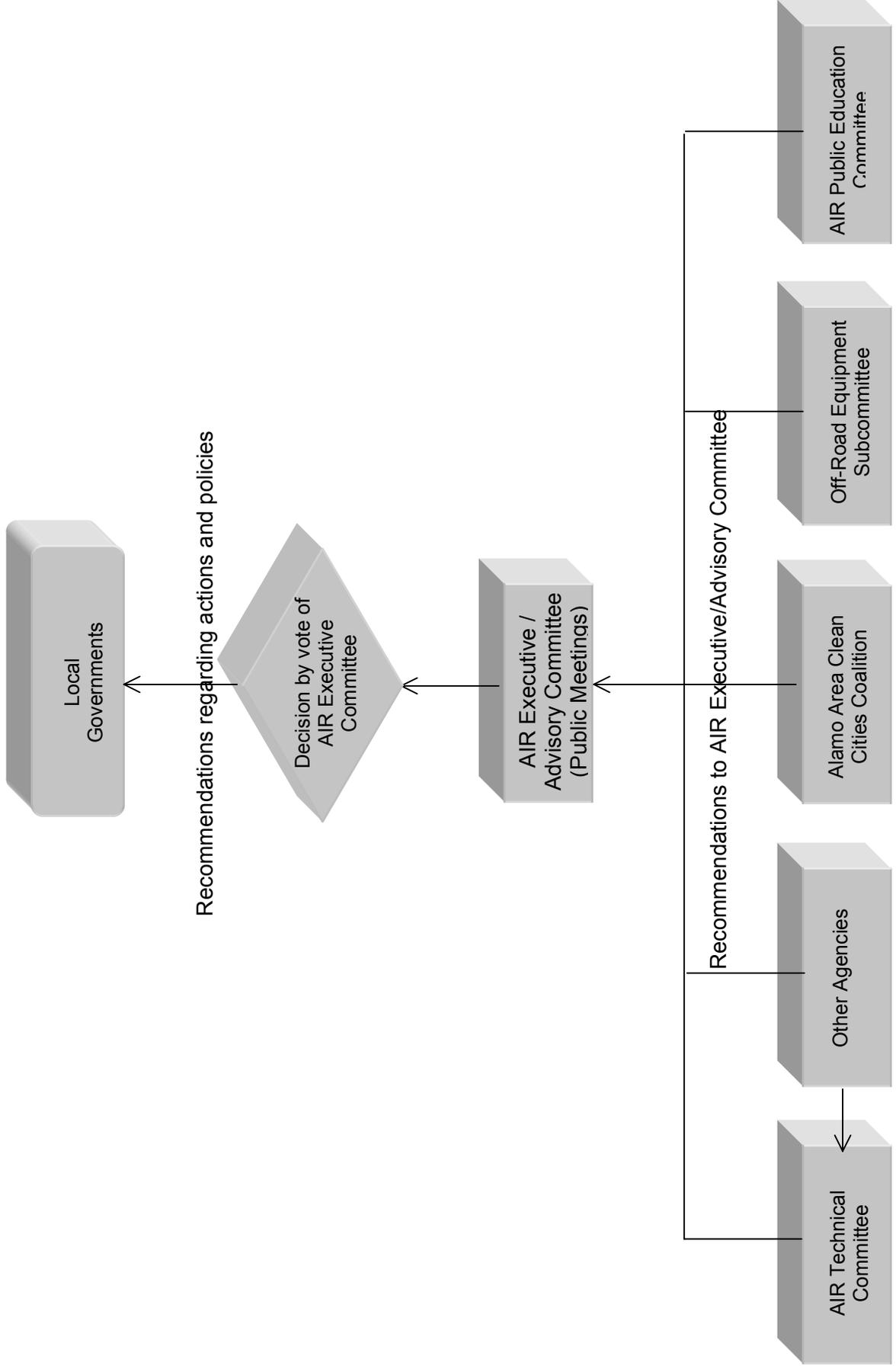
Management / Communication Procedures

Many of the technical decisions required by the modeling/analysis protocol – such as episode selection, choice of photochemical models, and others – were first discussed and evaluated by representatives of the Texas Near Non-attainment Areas (NNAs), the Texas Commission on Environmental Quality, the Environmental Protection Agency, and other technical advisors during regularly-scheduled meetings of the Texas NNA Working Group. A list of participants and stakeholders involved in the process is provided in part 2 of this appendix.

For instances where technical decisions affecting the San Antonio EAC Region (SAER) were first evaluated and approved by the NNA Working Group, approval was subsequently sought at the local level. Technical decisions reviewed/approved at the local level included such issues as episode selection and performance of the photochemical model. A typical process involving local participation would start with review and approval by the Texas NNA Working Group (including input from TCEQ and EPA) followed by review and approval by the AIR Technical Committee. Upon approval by the Technical Committee, the group would provide recommendations to the AIR

Executive/Advisory Committee. Final decisions were made by vote of the Executive members during public meetings of the AIR Executive/Advisory Committee. Whenever the protocol decisions involved matters of policy, the AIR Executive Committee made recommendations for action to the local governments represented by the AIR Executive Committee membership. Figure J-1 provides a flowchart of the communication process at the local level.

Figure J-1. Flowchart of Communication Process of the Air Improvement Resources (AIR) Committees.



For decisions such as modeling of potential clean air strategies and selection of clean air strategies for adoption in the SIP, evaluation and approval were primarily local issues. Input regarding potential clean air strategies was sought from as many local stakeholders as possible including members of the AIR Technical Committee, the Alamo Area Clean Cities Coalition, and the Off-road Equipment Subcommittee. Additionally, public input was encouraged through a series of meetings conducted by AACOG that addressed such topics as the Clean Air Plan, regional air quality, and clean air strategies as shown in table J-2.

AACOG staff provided news briefs to the media regarding public meetings to encourage participation as shown in exhibit A. The public meetings were held at various locations and in all four SAER counties to provide access to as many regional citizens as possible. In addition to citizen's comments made during public meetings, AACOG encouraged feedback by accepting public comments via mail, fax, and email. Public comments were compiled and provided to the AIR Executive Committee (voting) members on a regular basis.

Table J-2. Public Meetings Conducted in the SAER Counties.

Date	Location	Topic(s) of Discussion	Purpose(s)
August 20, 2002	AACOG Boardroom 8626 Tesoro Drive Suite 100 San Antonio, TX 78217 Bexar County	Regional Air Quality Clean Air Plan Non-attainment designations Vehicle emissions testing	To educate the public on the current air quality situation and the structure, purpose, and function of the Clean Air Plan. To answer questions and gather comments regarding the Clean Air Plan, potential designation of "non-attainment" by the EPA, and vehicle emissions testing programs.
January 22, 2003	AACOG Boardroom 8700 Tesoro Drive Suite 100 San Antonio, TX 78217 Bexar County	Early Action Compact and Clean Air Plan Pollution control strategies	To educate the public on the structure, purpose, and function of the Early Action Compact. To answer questions and gather comments regarding the Early Action Compact, the Clean Air Plan, and air pollution control strategies to be considered.
February 22, 2003	AACOG Boardroom 8700 Tesoro Drive Suite 100 San Antonio, TX Bexar County	Regional air quality Air pollution strategies under consideration Control strategy evaluation Early Action Compact and Clean Air Plan	To update the public on our air quality situation and the process of evaluating potential air pollution control strategies for our Clean Air Plan. To answer questions and gather comments regarding the Early Action Compact, the Clean Air Plan, and air pollution control strategies to be considered.

March 19, 2003	Landa Haus 360 Aquatic Circle New Braunfels, TX 78130 Comal County	Regional air quality Air pollution strategies under consideration Control strategy evaluation Early Action Compact and Clean Air Plan	To update the public on our air quality situation and the process of evaluating potential air pollution control strategies for our Clean Air Plan. To answer questions and gather comments regarding the Early Action Compact, the Clean Air Plan, and air pollution control strategies to be considered.
April 12, 2003	Seguin City Council Chambers 210 E. Gonzales Seguin, TX Guadalupe County	Regional air quality Air pollution strategies under consideration Control strategy evaluation Early Action Compact and Clean Air Plan	To update the public on our air quality situation and the process of evaluating potential air pollution control strategies for our Clean Air Plan. To answer questions and gather comments regarding the Early Action Compact, the Clean Air Plan, and air pollution control strategies to be considered.
May 20, 2003	Criminal Justice Center 800 10 th Street Floresville, TX Wilson County	Regional air quality Air pollution strategies under consideration Control strategy evaluation Early Action Compact and Clean Air Plan	To update the public on our air quality situation and the process of evaluating potential air pollution control strategies for our Clean Air Plan. To gather comments regarding the Early Action Compact, the Clean Air Plan, and air pollution control strategies to be considered.
June 14, 2003	AACOG Boardroom 8700 Tesoro Drive Suite 100 San Antonio, TX 78217 Bexar County	Regional air quality Control strategy evaluation	To answer questions and update the public on our air quality situation and the process of evaluating potential air pollution control strategies for our Clean Air Plan.

July 16, 2003	AACOG Boardroom 8700 Tesoro Drive Suite 100 San Antonio, TX 78217 Bexar County	Regional air quality Control strategy evaluation	To answer questions and update the public on our air quality situation and the process of evaluating potential air pollution control strategies for our Clean Air Plan.
November 5, 2003	AACOG Boardroom 8700 Tesoro Drive Suite 100 San Antonio, TX 78217 Bexar County	Clean air strategies under consideration	To provide information on the Clean Air Strategies being considered as a part of the region's Clean Air Plan. To answer questions posed at previous Clean Air Plan workshops.
November 18, 2003	AACOG Boardroom 8700 Tesoro Drive Suite 100 San Antonio, TX 78217 Bexar County	Air quality Clean Air Plan Clean air strategies	To receive public comments on air quality, the Clean Air Plan, and Clean Air Strategies.
February 3, 2004	AACOG Boardroom 8700 Tesoro Drive Suite 100 San Antonio, TX 78217 Bexar County	Draft Revision to the State Implementation Plan Clean air strategies under consideration	To provide information on the Clean Air Strategies being considered as a part of the region's revision to the State Implementation Plan for air quality, and to gather public comment on those strategies.

Choice of Air Quality Simulation Model and how it Meets Requirements in 40CFR51, Appendix W for using “Alternative” Models

The September 1999 episode was modeled by ENVIRON International Corporation using the Comprehensive Air Quality Model with Extensions (CAMx). In 2003, the federal guidance listing alternative models (appendix B of 40 CFR Part 51, appendix W) was removed from appendix W (Federal Register, 2003) and placed on EPA’s Support Center for Regulatory Air Models (SCRAM) web site. This web site lists CAMx as an alternative dispersion model (EPA web page, no date).

Rationale for Choice of Air Quality and Emissions Model and Choice of Method for Generating Meteorological Inputs

According to EPA’s [Summary Descriptions of Alternative Air Quality Models](#) (EPA web page, no date), “CAMx is appropriate for simulating hourly ozone, CO, and PM concentrations from the urban-scale to regional-scale.” Furthermore, the Texas Commission on Environmental Quality supports the use of CAMx for regional-scale modeling. The Attainment Demonstration for the Dallas/Fort Worth Ozone Nonattainment Area (TNRCC, 1999) states that models recommended by the EPA in past years had been replaced with updated counterparts such as CAMx that demonstrate “improved model chemistry, better treatment of vertical diffusion, and more realistic treatment of plumes.” Because of these and other advantages, the TCEQ recommends the use of CAMx for ozone attainment demonstration modeling in Texas.

Emissions inputs to the photochemical model were developed by a variety of agencies. State and regional emissions for the base year (1999) and projection year (2007) were provided to AACOG from the Commission; therefore the state and regional EI data have undergone review and approval at the state level. For some categories of inputs, such as regional 2007 EI, the data were also federally approved. Local area and off-road sources were developed by AACOG staff using EPA recommended / alternative methodologies or using EPA software models (e.g., NONROAD). Local biogenic and point source data were provided by the Commission. With few exceptions, the Commission-provided point emissions were used as model input. Examples where the Commission’s data were not used included data developed from measurements recorded at or studies conducted for specific emission point sources (e.g. a wastewater treatment plant and power plants) and provided to staff by representatives of those point sources. Appendices D and F provide additional information regarding methodologies/models used to develop the modeling emission inventories.

The Fifth Generation Pennsylvania State University/National Center for Atmospheric Research (PSU/NCAR) Mesoscale Model (MM5) was utilized by ENVIRON to develop hourly, three-dimensional meteorological input fields for CAMx. The original 1999 episode was developed using MM5v3.4 (version 3, release 4). During the model refinement process, modelers were able to take advantage of the expanded capabilities of the recently released MM5v3.5. The fifth-generation Penn State/NCAR Mesoscale Model is the primary tool for providing meteorological input for EPA’s Models-3/Community Multiscale Air Quality (CMAQ) modeling system. EPA recognizes that MM5 is widely used for providing meteorological characterizations throughout the air quality modeling community (EPA web page, no date). Development of the meteorological inputs is explained in more detail in appendix B.

Identification of Specific Deliverables and Schedule for Delivery to the Appropriate U.S. EPA Regional Office

The Early Action Compact for the San Antonio region lists milestones that must be completed in accordance with a specified timeline. Most milestones include products for delivery to the TCEQ and U.S. EPA Region 6 Office. The sections of the milestone list that contain deliverables are reproduced in table J-3 below. Table J-3 also references the sections of the EAC where the milestones are described.

Table J-3. Schedule of Deliverables to U.S. EPA Region 6.

Milestone	Delivery Date	Reference in the Early Action Compact
Emissions Inventory Milestones		
Development of a 1999 or later episode emissions inventory according to requirements in Chapter IV, b)	March 31, 2004	Chapter IV, b)
Incorporate MOBILE6 data with Link-Based Travel Demand Model data in urban areas	March 31, 2004	Chapter IV, b)
Further emission inventory episode development based on local Conceptual Model update. Other episode inventories, if required, made in concert with EPA, TCEQ, and local entities.	April 30, 2003 and April 30, 2005	Chapter IV, b)
NONROAD model data adjusted for local equipment populations and usage rates; Area source data is based when possible on local survey data.	March 31, 2004	Chapter IV, b), c)
Modeling Milestones		
Develop SIP quality modeling episodes that perform within the EPA's accepted margin of accuracy, including a base case and future case on or before December 31, 2007. Documented & reviewed by TCEQ & EPA. Quantifiable emission reduction measures in the future case to produce one or more control cases. Control strategies determined against control case model.	September 30, 2003	Chapter IV, c)
Develop other episodes as necessary to fully represent the variety of situations that typically contribute to local ozone production	Updates delivered by April 30, 2003 and April 30, 2005	Chapter IV, c)
Control Strategy Development Milestones		
Identify additional local controls, as necessary, to demonstrate 2007 attainment of the 8-hour standard. Controls implemented by Dec. 31, 2005, with full local stakeholder participation.	Future case analysis, control cases and control case showing achievement of the 8-hour ozone standard on or before Dec. 31, 2007 will be delivered as a report by March 31, 2004 from AACOG	Chapter IV, d)
All control measures will be incorporated by the state into the State Implementation Plan.	March 31, 2004	Chapter IV, d)
Maintenance for Growth Milestones		
Component to address emissions growth at least 5 years beyond December 31, 2007, ensuring that the area will remain in attainment of the 8-hour standard during that period.	March 31, 2004.	Chapter IV, e)

Milestone Maintenance for Growth Milestones (continued)	Delivery Date	Reference in the Early Action Compact
If the review of growth demonstrates that adopted control measures are inadequate to address growth in emissions, additional measures will be added to the plan	After December 31, 2004. See conclusion to Appendix L for details.	Chapter IV, e)

Data Access

Input files for and output files generated from the photochemical model have been archived by the Alamo Area Council of Governments, the Texas Commission on Environmental Quality, and the University of Texas at Austin. Other data access issues are described in the table below (J-4).

Table J-4. Data Access Protocol.

Computer on which files were generated and can be read	Red Hat Linux 9.0, Pacific Group Fortran Compiler 1 gigabyte (gb) of DDR Ram 4-200 gb IDE hard drives, 1-80 gb SCSI hard drive
Software necessary to process model outputs	EPS2, CAMx version 3.10b, camxpost, camxtract, avgcat, PAVE, Perl
Contact person	Steven Smeltzer, Environmental Manager, AACOG 210/362-5266 ssmeltzer@aacog.com
Means for downloading files	Hard drive or off-site ftp server
Administrative procedures which need to be satisfied to access files	Written request to: Steven Smeltzer Environmental Manager Alamo Area Council of Governments 8700 Tesoro Drive, Suite 700 San Antonio, TX 78217

Other Protocol Topics

The EPA lists other modeling/analysis protocol steps in their draft guidance that were performed during development of the 1999 model, but are discussed in other areas of this attainment demonstration SIP. Table J-5 provides a list of these other protocol topics and the location of their descriptions in the SAER SIP and/or SIP appendices.

Table J-5. Modeling/analysis Protocol Steps Described elsewhere in SIP

Modeling/Analysis Protocol Topic	Location in SIP
Scientific peer review of modeling procedures and outputs	Chapter 3 of Executive Summary – Section 3.3.
Analyses included in the weight of evidence ("WOE") determination	A "weight of evidence" study as defined by EPA's draft 8-hour guidance was not required or appropriate, given definition of WOE; however, similar "additional evidence" analyses are provided in Chapter 5 of the Executive Summary (Section 5.5) and appendix K
Database used to support air quality modeling and other types of analyses	Chapter 3 of Executive Summary – Sections 3.4 and 3.5 and appendices B, C, D, E, and F
Methods used to quality assure emissions inputs	Chapter 3 of Executive Summary – Section 3.5.3
Domain size and spatial resolution to be used	Chapter 3 of Executive Summary – Section 3.3
Criteria/goals in selecting periods to model and process to be used in selecting episodes	Chapter 3 of Executive Summary – Section 3.2 and appendix A
Performance evaluation procedures and additional diagnostic tests planned	Chapter 3 of Executive Summary – Sections 3.6 and 3.8 and appendices E and G
Outcomes in the modeled attainment and screening tests as well as results of analyses to be used in a broader weight of evidence determination	Chapters 3 and 5 of Executive Summary – 3.9, 5.4, and 5.5 and appendices H and K

References

Federal Register (April 15, 2003). 40 CFR Part 51 Revision to the Guideline on Air Quality Models: Adoption of a Preferred Long Range Transport Model and Other Revisions; Final Rule. RIN 2060-AF01

Texas Natural Resource Conservation Commission (February 24, 1999). Revisions to the State Implementation Plan for the Control of Ozone Air Pollution: Attainment Demonstration for the Dallas/Fort Worth Ozone Nonattainment Area Rule Log No. 98046-SIP-AI. Austin, TX.

US Environmental Protection Agency (May 1999). Draft Guidance on the Use of Models and Other Analyses in Attainment Demonstrations for the 8-Hour Ozone NAQMS EPA-454/R-99-004.

US Environmental Protection Agency (no date). Atmospheric Modeling Models [On-line], Available: <http://www.epa.gov/asmdnerl/mm4.html>

US Environmental Protection Agency (no date). Dispersion Models – Alternative Models [On-line], Available: <http://www.epa.gov/scram001/tt22.htm#camx>.

US Environmental Protection Agency (no date). Summary Descriptions of Alternative Air Quality Models [On-line], Available: <http://www.epa.gov/scram001/models/other/altmodel.pdf>

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News Brief

Clean Air Plan Workshop to Discuss Draft State Implementation Plan, Clean Air Strategies

- What:** Clean Air Plan Workshop
- When:** Tuesday, February 3, 2004
6:00 p.m. – 8:00 p.m.
- Where:** Alamo Area Council of Governments Board Room
8700 Tesoro Drive, Suite 100, San Antonio, TX 78217
- Why:** To provide information on the Clean Air Strategies being considered as a part of the region's revision to the State Implementation Plan for air quality, and to gather public comment on those strategies.
- Who:** Open to the Public
- Cost:** FREE
- Contact:** Dorothy Birch
(210) 362-5213
dbirch@aacog.com
- More Info:** To view the draft State Implementation Plan, visit www.aacog.com/sip .
To learn about air quality and ozone pollution, visit www.aacog.com/air.

PART 2: MODELING PROTOCOL PREPARED BY ENVIRON INTERNATIONAL CORPORATION