Comments on Near-Term Options for Benefits Assessment

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Aggregate Benefits Analysis Using NATA Database

- Compare cancer risks in NATA for a recent year with 1996 or with "no-regulation" counterfactual
  - Value individual cancer risk reductions using existing estimates (e.g., Van Houtven et al.)
  - Provides a lower bound to benefits (excludes altruism and non-cancer effects)
- How to compute costs for a B-C analysis?
  - Can we attribute all reductions to MACT regs.?
- Supplement with computation of Levy equity index to see how this has changed over time

Benefits Analysis for Individual Regulations

- Individual BCAs of 174 NESHAPS not advisable
  - Would be very tedious
  - Most regulations cost < $100 million per year
- Not clear how it would inform regulation
  - Presumably concern is by substance or group of substances
- Keep benefits analysis qualitative here

Comments on Other Issues

- Equity is important – would compute Levy equity index – but not ask people to value it
- Should analysis focus on a limited number of HAPS?
  - Palma presentation suggests 4 substances are key NATA Cancer Drivers (account for 75% of burden)
  - This might facilitate construction of counterfactual in NATA benefits analysis
- Co-benefits analysis with criteria pollutants misses point of regulating HAPS