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An Inter-Comparison of Air Quality Social Cost Estimates from Reduced-Complexity Models

Elisabeth A. Gilmore^{1,*}, Jinhyok Heo², Nicholas Z. Muller³, Christopher W. Tessum⁴, Jason D. Hill⁵, Julian D. Marshall⁴, Peter J. Adams⁶

- 1. Department of International Development, Community, and Environment. Clark University, Worcester, MA., USA. gilmore@clarku.edu, 1-508-793-7292
- 2. Center for Atmospheric Particle Studies, Carnegie Mellon University, Pittsburgh, PA, USA
- 3. Tepper School of Business / Department of Engineering and Public Policy, Carnegie Mellon University, Pittsburgh, PA, USA & National Bureau of Economic Research, Cambridge, MA, USA
- 4. Department of Civil and Environmental Engineering, University of Washington, Seattle, WA, USA
- 5. Department of Bioproducts and Biosystems Engineering, University of Minnesota, St. Paul, MN, USA
- 6. Department of Civil and Environmental Engineering / Department of Engineering and Public Policy, Carnegie Mellon University, Pittsburgh, PA, USA

Abstract

Reliable estimates of externality costs—such as the costs from premature mortality from exposure to fine particulate matter $(PM_{2.5})$ —are critical for policy analysis. To facilitate broader analysis, several datasets of social costs of air quality have been produced by a set of reduced complexity models (RCMs). Using the tabulated marginal costs derived from RCMs is much easier than running the 'state of the science' chemical transport models (CTMs). However, the differences between these datasets have not been systematically examined, leaving analysts without guidance on how and when these differences matter. Here, we compare per-tonne marginal costs from ground-level and elevated emission sources for each county in the United States (U.S.) for sulfur dioxide (SO₂), nitrogen oxides (NO_x), ammonia (NH₃), and inert primary PM_{2.5} from three RCMs: Air Pollution Emission Experiments and Policy (AP2), Estimating Air pollution Social Impacts Using Regression (EASIUR), and the Intervention Model for Air Pollution (InMAP). National emission-weighted average damages vary among models by approximately 21%, 31%, 28% and 12% for inert primary $PM_{2.5}$, SO_2 , NO_x , and NH_3 emissions, respectively, for ground-level sources. For elevated sources, emission-weighted damages vary by approximately 42%, 26%, 42% and 20% for inert primary $PM_{2.5}$, SO_2 , NO_x , and NH_3 emissions, respectively. Despite fundamental structural differences, the three models predict marginal costs that are within the same order of magnitude. That different and independent methods have converged on similar results bolsters confidence in the RCMs. Policy analyses of national-level air quality policies that sum over pollutants and geographical locations are often robust to these differences, although the differences may matter for more source- or location-specific analyses. Overall, the loss of fidelity caused by using RCMs and their social cost datasets in place of CTMs is modest. Abstract and the particular state and the cost from premiums positive physics of the particular state and the cost from premium positive physics of the particular state and the particular state and the particular state an

Keywords: Model Inter-Comparison, Air Quality, Externality Costs, Policy Analysis

1. Introduction

When analyzing policies, products, or processes, it is critical to account for costs that are observed in the market as well as non-market costs, known as externalities (Baumol & Oates, 1988). For air pollution, adverse human health effects – especially premature mortality from exposure to ambient concentrations of fine particulate matter $(PM_{2.5})$ – result in large costs to society (United States Environmental Protection Agency (U.S. EPA), 2009). To estimate these costs, the U.S. EPA has generally employed an impact pathway assessment. This multi-step approach is as follows: first, Chemical Transport Models (CTMs) are used to estimate the impact of emissions on ambient concentrations; second, the health effects from exposure to these concentrations are quantified using concentration – response $(C-R)$ functions; and finally, the health impacts are monetized. For premature mortality, an estimate of the willingness-to-pay to avoid this impact, known as the value of a statistical life (VSL), is used to monetize these impacts. Presently, the U.S. EPA employs a central estimate of 7.4 million in 2006 USD (U.S. EPA, 2010).

The first step, modeling the relationship between pollutant emission and ambient PM2.5 concentrations, is especially challenging. $PM_{2.5}$ consists of a complex mixture of chemical species, both inorganic and organic, from diverse sources. Some $PM_{2.5}$ is directly emitted to the atmosphere and is known as primary particulate matter. Primary $PM_{2.5}$ is dominated by particulate elemental carbon (PEC) and organic carbon (POC) (Hand et al., 2012). However, most $PM_{2.5}$ is secondary, meaning that it originates from gaseous emissions that react in the atmosphere to form products that condense into the particle phase. PM2.5 is also separated into its inorganic and organic components. Inorganic $PM_{2.5}$ mostly results from emissions of sulfur dioxide (SO₂), nitrogen oxides (NO_x), and ammonia (NH₃). These gaseous precursors are converted into sulphate (SO₄²), nitrate $(NO₃^-)$ and ammonium $(NH₄^+)$ and form particulate matter through relatively well understood chemistry. This chemistry, however, is highly non-linear. The marginal sensitivities in PM2.5 concentrations to the precursor emissions depend on the initial concentrations and will change as the relative amounts of emissions of all three precursors change (Ansari and Pandis, 1998). For example, recent trends in emissions have decreased the marginal effect of NH3 emissions and increased that of NO_x emissions (Pinder et al., 2008; Holt et al., 2015). Organic PM_{2.5} consists of primary and secondary organic aerosol (POA and SOA) depending on whether it is emitted already in the particulate phase or whether it forms from gases in the atmosphere. SOA is formed from the oxidation of volatile organic compounds (VOCs), but the yield of organic 1. Introduction

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8 Western and policies, production and content constanting (Boundary Constanting the speed lad an PM_{2.5} varies substantially among VOC precursors. By contrast to the inorganic components, the sources and behavior of both POA and SOA are less well understood (Robinson et al., 2007). While scientific understanding of organic PM_{2.5} formation is advancing rapidly, this updated understanding is still being incorporated into the CTMs and thus, into the resulting social costs. The major removal mechanism for $PM_{2.5}$ is via precipitation. Hence, $PM_{2.5}$ can be transported for several days downwind, affecting populations up to approximately 1,000 km away from the point of emission (e.g., Evans et al., 2002). On the other hand, primary PM2.5 emitted in urban areas will have a large impact in the immediate vicinity. As a result, models of $PM_{2.5}$ must reproduce the behavior of a complex physical and chemical system, and they require both sufficiently high resolution near sources as well as a long-range spatial extent to capture all the health impacts of a single source.

CTMs are the 'state-of-the-science' tool for predicting how much $PM_{2.5}$ is formed from a given set of emissions, but the complexity of these models limits their applicability. To improve the availability and accessibility of air quality modeling and cost estimates, the air quality research community has produced a set of new models, known as reduced-complexity air quality models (RCMs) and associated sets of marginal social costs, i.e., monetized damages per pollutant (in USD per tonne of emission). In this paper, we compare three RCMs and their datasets that provide estimates of externality costs from air pollution: the Air Pollution Emission Experiments and Policy (APEEP) model (Muller & Mendelsohn, 2007) updated to AP2 (Muller et al., 2011), the Estimating Air pollution Social Impacts Using Regression (EASIUR) model (Heo et al., 2016a; 2016b), and the Intervention Model for Air Pollution (InMAP) (Tessum et al., 2017). We select these three RCMs as they provide comprehensive estimates covering the entire continental United States (U.S.) at relatively high spatial resolution (county level or finer). ²

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In this inter-comparison, we have three main aims:

i. Provide guidance on how and when the differences matter between these three RCMs. While these RCMs are documented in the peer-reviewed literature, the differences in the social cost datasets have not been systematically examined.

ii. Compare the results from the RCMs to the CTMs. Since the RCMs are, by definition, less physically detailed than the CTMs, there is also a potential loss of fidelity. This type of comparison can help justify their use for certain applications and allow users to judge the robustness of the results from the RCMs.

iii. Evaluate the uncertainty in the air quality models. While it is recognized that evaluating the uncertainty in the air quality benefits is critical as the effects of changing PM_{2.5} levels on mortality constitute a key component of the U.S. EPA's approach for assessing potential health benefits for air quality regulations (National Research Council, 2002), characterizing the full uncertainty in the air quality model is especially challenging (e.g., Fraas & Lutter, 2013). As the three RCMs take fundamentally different approaches to the air quality modeling, they may be understood to produce largely independent estimates. Hence, comparing and quantifying the differences between the independently derived estimates of social costs from the RCMs also provides an indication of the uncertainty of how emissions are transformed into ambient concentrations.

2. Review of CTMs and RCMs for Assessing Air Quality Social Costs

Predicting the impacts of emissions on ambient concentrations is usually done using a comprehensive CTMs. CTMs are three-dimensional mechanistic models that predict ambient concentrations of pollutants using mass balance principles and accounting for emissions, transport, and dispersion by winds, chemical transformations, and atmospheric removal processes. CTMs are the most scientifically detailed and rigorous tools available for linking emissions to ambient concentrations. Examples of CTMs include the Comprehensive Air Quality Model with Extensions – CAMx (ENVIRON, 2016), Community Multi-scale Air Quality Model – CMAQ (Appel et al., 2017), and Weather Research and Forecasting model coupled with Chemistry – WRF-Chem (Powers et al., 2017). Running full CTMs is intensive enough in terms of expertise, time, and resources that their usage is generally limited to air quality researchers and regulatory authorities, such as the U.S. EPA's regulatory impact assessment for revisions to the National Ambient Air Quality Standards (NAAQS) and state agencies as part of the accompanying State Implementation Plans (SIPs). Even then, many states do not have in-house capabilities to run CTMs, relying on consultants or regional associations for their modeling needs. Despite the availability of RCMs, however, it is prudent to use a full CTM to assess the likely impact of major air quality policies before their implementation to ensure the best estimates of benefits for comparison to costs. Additionally, the comprehensive CTMs constitute the benchmark against which simpler models can be judged. For Fourist to the air equality models. While it is recognized that

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To address the challenges with running CTMs, a number of RCMs have been developed. The

magnitude of the social costs of air pollution suggests that it would be useful to have models like RCMs that facilitate the quantification of the costs and their uncertainty as part of routine policy analysis. Further, the availability of simpler and more accessible models would greatly expand the community of people who could quantify the public health costs of air pollution, including city planners, affected industries, and citizen groups. Those who run CTMs can find RCMs useful when they want to explore quickly a broad range of emissions scenarios. In this paper, we describe and compare results from three such models, which are described in detail below: AP2, EASIUR, and InMAP. We also briefly describe other RCM efforts.

APEEP and its updated version, AP2, employs a source-receptor (S-R) matrix framework to map emissions to ambient concentrations at the county-level (Muller & Mendelson, 2007, Muller et al., 2011). The contribution of emissions in a source county (S) to the ambient concentration in a receptor county (R) is represented as the (S, R) element in a matrix. In the module for $PM_{2.5}$ formation, the model contains S-R matrices that govern how PEC, SO_2 , NO_x , NH_3 , and VOC map to PM2.5. Each of these matrices accepts annual (U.S. short tons per year) emission vectors to produces predictions of annual means. For each of these matrices, the model distinguishes among emissions released at four different effective height categories: ground-level emissions, point sources under 250 meters, point sources between 250 meters and 500 meters, and point sources over 500 meters. AP2 employs the approach to estimating the NH_4^+ , SO_4^2 and NO_3 equilibrium embodied in the Climatological Regional Dispersion Model (CRDM), a national-scale Gaussian dispersion model (Latimer, 1996). In the equilibrium computations, ambient NH_4^+ reacts preferentially with SO_4^2 . Second, ammonium nitrate (NH₄NO₃) is only able to form if there is excess NH₄⁺. To translate VOC emissions into secondary organic particulates, AP2 employs the fractional aerosol yield coefficients estimated by Grosjean and Seinfeld (1989). While APEEP was evaluated against a 2002 annual average baseline run produced by CMAQ, AP2 predictions are tested against Air Quality System (AQS) monitoring data. Calibration coefficients are used to adjust AP2 predictions to jointly minimize mean fractional error and mean fractional bias. We use AP2 in the text to clarify that we are comparing the results from the updated version of the original APEEP. respectively. The social costs of air pollution suggests that it would be useful to have maken life.

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The EASIUR model (Heo et al. 2016a; 2016b) estimates marginal social costs for four species—inert primary $PM_{2.5}$, SO_2 , NO_x , and NH_3 —in a 36 km \times 36 km grid covering the continental U.S. The social costs are provided for four seasons and for three emissions elevations

(ground-level, 150 m, and 300 m). The EASIUR model was derived by running regressions on a CTM data set consisting of small emissions perturbations occurring at 100 sample locations. CAMx was run to calculate social costs of the four species at the sample locations (randomly chosen based on population size) across the nation. Then, the resulting per-tonne social costs were regressed as a function of exposed population and atmospheric variables such as temperature and atmospheric pressures using half of the sample locations as training for the regression and half as out-of-sample evaluations. Finally, using the regression models, per tonne social costs were estimated at all the cells in the 36 km \times 36 km grid. In addition, an EASIUR-based source-receptor model was developed from the regression results (Heo et al., 2017). The source-receptor version was used to estimate concentrations for comparisons made in this study.

InMAP (Tessum et al., 2017) combines simplified representations of atmospheric chemistry and physics with output from WRF-Chem to calculate annual-average marginal changes in concentrations of $PM_{2.5}$ caused by marginal changes in emissions of SO_2 , NO_x , NH_3 , $VOCs$, and inert primary PM2.5 using a three-dimensional spatial grid with horizontal resolution ranging between 1 km \times 1 km in highly populated areas to 48 km \times 48 km in unpopulated areas and over the ocean. InMAP operates independently of the underlying CTM, and InMAP users would only need to also use a CTM or access the raw CTM output data if they were interested in applying InMAP to a new spatial or temporal domain (e.g., outside of the continental U.S.). We used an InMAP-based source-receptor matrix (ISRM; Goodkind et al., 2019) to predict the health impacts and to calculate social costs of emissions in every InMAP grid cell at three emission heights (ground level, low stack height point sources, and high stack height point sources) and used the social cost of emissions from each county centroid in comparisons here. 24

6 (ground-level, 150 m, and 300 m). The FASHUR model was derived by running expressions on

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There are other RCMs that we review here, but do not include in our inter-comparison. The Co-Benefits Risk Assessment (COBRA) screening model is another RCM, developed by the U.S. EPA, which provides marginal social costs at county-level resolution (U.S. EPA, 2018). COBRA and AP2 share the core framework for modeling the air quality impacts of a unit of emission. Both models are built around the CRDM (Latimer, 1996) and then calibrated to existing air quality modeling and measurements. There are minor differences in the treatment of the elevated sources, the approach to the simplified chemistry and the calibration approach. Because COBRA and AP2 are built on the same core air quality modeling, marginal social costs from COBRA are typically very similar to those from AP2. We only review AP2 in this paper.

U.S. EPA's Response Surface Model (RSM), with its benefit per ton values, is another similar tool (Fann et al., 2009; Fann et al., 2012; U.S. EPA, 2015). Compared to the RCMs evaluated here, RSM has lower spatial resolution, only providing average impacts for nine urban areas plus the U.S. overall average. An advantage of RSM, however, is that it can capture some of the nonlinear responses in the $PM_{2.5}$ chemistry, which can occur with larger changes in inorganic $PM_{2.5}$ levels (e.g., Holt et al., 2015). We also do not review related tools such as Environmental Benefits Mapping and Analysis Program (BenMAP), which is focused on estimating health outcomes and does not include any air quality modeling. Rather, it requires ambient concentrations as inputs rather than emissions (U.S. EPA, 2017). The RCMs evaluated in this manuscript use a similar approach to health effect and economic valuation as employed in BenMAP. Other studies also have provided marginal social cost values but for limited regions of the US or limited emissions sectors, including the Direct Decoupled Method (DDM) of Bergin et al. (2008), regression-based approaches developed by Buonocore et al. (2014) and Levy et al. (2009), and source-based estimates from Goddard Earth Observing System with Chemistry model (GEOS-Chem) (Caiazzo et al., 2013). L.S. FIPA:: Response. Surfa[ce](https://www.epa.gov/outdoor-air-quality-data): Model (RSM), with its benefit per ton values, is another surface for a state of the state of the state of the state of the SSM and the SSM and

3. Methods and Models

Here, we evaluate the performance and the damage estimates from three RCMs. One of the first applications of the RCMs has been to develop marginal damage estimates, i.e., those that result from small perturbations of emissions. The results from the model, expressed in US dollars (USD) of damage per tonne of emissions, are specified at a minimum for a type of pollutant, a location, a population and at least implicitly, for a given time period (e.g., a year). All results in this manuscript are expressed in 2010 USD.

First, we assess the RCMs in terms of their ability to predict observed $PM_{2.5}$ concentrations and their composition. We compared concentration estimates against annual average concentrations provided by U.S. EPA's Air Data (available at https://www.epa.gov/outdoor-airquality-data). A caveat is that, given nonlinearities in PM_{2.5} formation discussed above, one does not necessarily expect that the marginal values from the RCMs will predict realistic PM_{2.5} concentrations. Using the 2005 National Emissions Inventory (NEI), AP2 estimated concentrations directly using its county-level source-receptor model. By contrast, EASIUR and InMAP combined the 2005 NEI with each RCM's marginal damage estimates in a spatially disaggregated way, i.e., the emissions of each species in each model source location make a linear

contribution to all model locations. These contributions are then summed at each downwind "receptor" location to represent the RCM's prediction of $PM_{2.5}$. The latter approach assumes that the nonlinearities in the chemistry are not large. As a representative CTM, we also show the performance for WRF-Chem (Grell et al., 2005, as configured in Tessum et al., 2015). See Table S1 for information on the configuration of WRF-Chem.

Second, we conduct an inter-comparison of the social costs from three models, focusing on four main categories of emissions that form ambient $PM_{2.5}$: inert primary $PM_{2.5}$, SO_2 , NO_x , and NH3. To isolate the effect of the air quality modeling on the damage estimates, we harmonized the main inputs: baseline emissions, population, C-R function, and VSL. We select the baseline emission inventories and population for 2005. For the PM_{2.5} C-R function, we use the results from the American Cancer Society (ACS) epidemiological study for annual, all-cause mortality for adults (Krewski et al., 2009); we do not quantify morbidity effects. We apply the U.S. EPA's VSL of 7.4 million in 2006 USD. We do not show results for VOCs because not all three models predict impacts from VOCs due in part to the uncertainties described in the introduction. Additionally, because neither AP2 nor InMAP accounts for the variability in SOA yield among individual VOC species, we are less confident that the variability between the models is representative of overall uncertainty in predictions of SOA impacts than we are for the inorganic species. We discuss the implications of the uncertainty in the damage estimates and make recommendations for how to approach these estimates in the results and discussion section. contribution to all model lueations. These contributions are then started at each discussion
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4. Results and Discussion: Comparison of Ambient Concentrations and Social Costs

First, we compare the models to WRF-Chem and find that in general, they have similar performance. These results show some important trends, with all models, including the CTM, performing worse for NH_4^+ and NO_3^- predictions, illustrating that some $PM_{2.5}$ species are more difficult to model and, by extension, the damage estimates for their precursors will be more uncertain. At the same time, the relative success in reconstructing PM_{2.5} concentrations from marginal impact estimates suggests that differences between marginal and average changes are not too large or mostly cancel out among different pollutants and locations. On balance, these comparisons boost confidence in the use of RCMs and suggest that the necessary simplifications inherent in them do not substantially degrade their performance compared to CTMs. EASIUR does not estimate damages or SOA formation from VOC emissions; hence, an estimate of total PM_{2.5}

is not possible from EASIUR at the current time. Additionally, we do not include a comparison of InMAP's predicted PEC concentrations against observations. In principle, InMAP can predict PEC; however, the NEI reports only total primary PM_{2.5}. It is outside of the scope of this work to conduct the additional processing to speciate these emission into InMAP format. We show the results of this evaluation in Supplemental Information (Figure S1). In addition to this comparison with WRF-Chem, each RCM has undergone substantial validation to both CTMs and in the case of AP2, observed ambient concentrations. InMAP was compared against 14 separate runs from WRF-Chem to show that it could predict concentration changes (Tessum et al., 2017). EASIUR was directly derived from CAMx output with out-of-sample evaluations for independent testing and is thus indirectly already validated against a CTM. Further, by comparing AP2 and InMAP to EASIUR, they are also indirectly compared to CAMx.

Turning to social costs, we show the summary results for ground and elevated sources in the US in Figure 1, respectively. For ground-level sources, emission-weighted damages for the US varied by approximately 21%, 31%, 28% and 12% for inert primary $PM_{2.5}$, SO_2 , NO_x , and NH_3 emissions, respectively with a range of $70,000-120,000$ USD per tonne of $PM_{2.5}$, $21,000-45,000$ USD per tonne of SO₂, 6,400–13,000 USD per tonne of NO_x , and 38,000–49,000 USD per tonne of NH3. For elevated sources, emission-weighted damages for the US varied by approximately 42%, 26%, 42% and 20% for inert primary $PM_{2.5}$, SO_2 , NO_x , and NH_3 emissions, respectively with a range of 36,000–110,000 USD per tonne of $PM_{2.5}$, 20,000–35,000 USD per tonne of SO₂, 6,300– 11,000 USD per tonne of NO_x , and 32,000–51,000 USD per tonne of NH₃. See Supplemental Information (Table S2) for tabulated values and calculations of variance. We report emissionsweighted averages because aggregate health damages from a set of emissions are the sum of emissions rate and marginal social cost which is then summed across all source locations. Therefore, aggregate damages are proportional to the emissions-weighted mean. Put another way, if two models differ by 10% in their emissions-weighted mean, their assessment of aggregate damages across the country for that species would also differ by 10%. Therefore, this metric is a good indicator of how much two models would differ for a policy where emissions changes are distributed similarly to current emissions. We also compare our national results to those produced by Fann et al. (2009). We find that our values are within the same range with the exception of primary PM_{2.5} where Fann et al. (2009) have much higher values than the three RCMs. We show the tabulated comparison in Table S3. is not possible from FASHUR at the careter time. Additionally, we then the black completion of \sim MANUs product the Concernation s agents to because the state intervention in Fincing product the solid control of the sta

Overall, these three sets of marginal costs show similar trends. First, as shown in Figure 1, for any given emitted species by model, the marginal social cost varies by at least one order of magnitude depending on the location of emissions for both ground and elevated sources. Additionally, we conclude that the elevated and ground level sources generally behave the same with most point sources having a similar or lower social cost than the ground level sources. While the elevation allows the plume to span a greater area, the point sources are generally in rural areas. There are isolated cases where the reverse is true. These exceptions occur where the point sources, which are primarily in rural areas, have plumes that overlap with highly populated urban centers. Furthermore, the difference between elevated and ground is largest for primary PM_{2.5} as expected. For secondary PM2.5, where chemical and/or physical transformation needs to take place, the social costs are similar. By the time the $PM_{2.5}$ is formed by chemical reactions, there has been enough vertical mixing that the original release height has little influence. As the results are similar for the ground and elevated sources, we focus the rest of the discussion on the ground sources for simplicity.

In Figure 2, we show the estimates of social costs for ground-level sources from each model for each county in the US. Figure 2 shows that social costs are consistently higher from emissions in or near densely populated areas, especially the eastern U. S.. Much of the variability in impacts, therefore, is a simple function of the number of people downwind exposed to the resulting $PM_{2.5}$. Third, for each RCM, the rank order of species from most damaging to least damaging (per tonne) is generally primary $PM_{2.5}$, NH₃, SO₂, and NO_x. Since current understanding treats all PM_{2.5} components the same in terms of the health impacts, this rank order simply reflects the efficiency with which a tonne of emitted species forms ambient $PM_{2.5}$. By definition, primary $PM_{2.5}$ emissions immediately form ambient PM_{2.5}; hence, they have the largest efficiency and highest damages. For the secondary species, damages from NH_3 and SO_2 are moderate with NO_x having the lowest damages. The relatively high social costs of NH3 can be understood as follows. Both $NH₃$ and NO_x emissions contribute to the formation of NH₄NO₃; but, depending on circumstances, either one or the other emission can be limiting. However, since the molecular weight of NH_3 is much lower than that of NO_x , a ton of $NH₃$ represents more molecules. All else being equal, it will tend to have a higher marginal social cost on a per mass basis. Additionally, NH₃ emissions will increase PM_{2.5} concentrations by neutralizing SO_4^2 . For comparison, Holt et al. (2015) also shows high sensitivity of $PM_{2.5}$ to NH_3 emissions on a per tonne basis (Holt et al., 2015). Thus, all three 63

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any person control of the f RCMs show similar and expected trends that are easily interpretable in terms of atmospheric behavior and population exposure, boosting confidence in these estimates.

In Figures $3 - 6$, we show the model inter-comparisons for each species for ground level sources. Similar plots for elevated sources can be found in Supplemental Information (Figures S2 – S5). All three RCMs provide damage estimates that are highly spatially resolved with respect to emissions location. Whereas some application scenarios will involve nationwide emissions changes, others may be focused on damages from emissions in one region of the country, perhaps a single state or even a single county. Therefore, it is worthwhile evaluating to what extent the three RCMs agree in terms of spatial patterns and county-by-county damage estimates. Here, we find that the level of agreement varies considerably by species according to the complexity of the associated chemistry, mirroring how some species are inherently more difficult to model than others, even for a CTM (Figure S1). While all three RCMs estimate these social costs at high spatial resolution, the similarity of their answers depends on the species in question and the complexity of its atmospheric behavior. For ground-level primary PM2.5, the models have very similar values across all counties with Pearson's correlation ranging from 0.73–0.81. For primary PM2.5, which is an inert species emitted directly in particulate form, concentrations are influenced only by differences in atmospheric transport and dilution. This is noted because it has been suggested that Gaussian dispersion modeling is not applicable at distances that exceed 100 km, yet we do not observe systematic biases in the AP2 estimates compared to the CTM-derived models. Consistent with the more complex chemistry, results for cost estimates for secondary pollutants are more variable on average and spatially and the correlations are lower of the secondary pollutants: $0.54-0.73$ for NH₃, $0.35-0.49$ for SO₂, and $0.077-0.54$ for NO_x. The formation of secondary PM_{2.5} depends on how efficiently precursors are converted to secondary species. In the atmosphere, this typically depends on chemistry, deposition rates, sunlight, and the availability of co-reactants especially atmospheric oxidants and thermodynamic interactions between inorganic ions (Ansari and Pandis 1998; West et al. 1999). Additionally, the impacts of secondary pollutants should also more dependent on accurately predicting transport as chemical reactions can occur over long distances and thus expose populations further from the source. Thus, the model selection has a larger role as the estimates of impacts depends on both the representation for long-range transport and chemical processes. Since NH_4^+ , SO_4^2 and NO_3^- concentrations depend on each other, differences in the model predictions for one species will influence the others. BCMs show similar and expected trends that are casily interpretable in kerns of any
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Finally, in the case of SOA impacts, we are less confident that variability between current RCM estimates represents true prediction uncertainty than we are for inorganic $PM_{2.5}$ species. This is because VOCs from different emissions sources can vary greatly in their SOA production efficiencies and because the fundamental understanding of the formation of SOA from precursor VOCs is still rapidly evolving (Robinson et al., 2007). Presently, marginal social costs for VOC emissions are available from the InMAP and AP2 models, but the prediction of impacts from VOC emissions in RCMs is an area for future development. Specifically, RCMs that account for the fact that different sources have different mixes of VOCs and, therefore, different SOA/PM2.5 formation and damage costs (Jathar et al., 2014) would be desirable. When using SOA estimates from current RCMs, we recommend that users consider how the specific mix of VOC species that are relevant to their own scenarios compared to the anthropogenic average mixes implied within the RCMs. In cases where the VOC mixes are substantially different, chemical transport modeling with a more detailed treatment of VOC composition may be warranted. Finally, in the case of SOA impacts, we are less confident that variability between the
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5. Conclusion

The public health impacts of air pollution, mostly due to premature mortality caused by $PM_{2.5}$ exposure, dominate the benefits analysis of most rules and regulations that target the energy and transportation sectors. Because evaluating these impacts using a state-of-the-science CTM can be challenging, several recent efforts have developed RCMs to provide estimates of the marginal social costs stemming from a tonne of PM2.5 emissions and its precursors. In this paper, we compare three datasets of air quality costs derived by RCMs: AP2, EASIUR, and InMAP. We conclude that users can generally use marginal social costs reported by these models for decision and policy analysis in lieu of chemical transport modeling with only a modest loss of fidelity.

We show that the RCMs evaluated here can predict the nationwide distribution of PM_{2.5} concentrations with only a modest reduction in accuracy as compared to a CTM. Further, for analyses at a national scale and over many sources, the differences in the air quality modeling approaches reviewed in this paper are less important for the aggregate social costs. Generally, for the evaluation of policies that are enacted at the national level, the total costs from all models are within a factor of two or three. Further, the differences in the social costs as a function of species emitted and source location are broadly similar between models and can be readily understood based on the known atmospheric behavior of that species and the size of the downwind population

exposed to $PM_{2.5}$.

Additionally, the model estimates reviewed in this paper are derived from different air quality modeling approaches but with harmonized assumptions for the C-R function and the VSL. Hence, the range of the estimates presented here can be interpreted as a measure of the degree of uncertainty inherent in the air quality modeling. Understanding why two CTMs produce different results is challenging as it is difficult to isolate all the factors that drive the differences. We face the same type of challenge when comparing the RCMs. Additionally, since each RCM takes a different approach to abstracting the physical and chemical processes for $PM_{2.5}$ and the meteorology, it is even more challenging to isolate the factors. Thus, we focus on the substantive differences – the social costs – that are affected by the modeling choices made by each RCM. In general, the air quality modeling differences introduced by and between the RCMs shown here are not large when viewed in the context of the other uncertainties in the damage estimates. These differences are small in comparison with other uncertainties involved in air quality decisionmaking such as the C-R function and VSL. The differences in the damages are comparable to errors between CTMs as well as the errors between CTMs and observed ambient concentrations. expressel to PM₅.

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In some locations and for some pollutants, however, these differences can be more substantial; for example, it would be appropriate to investigate the range of benefit estimates for applications which are more geographically limited and especially where NO_x emissions are the dominant concern, such as the Marcellus shale development (Roy et al., 2014) and replacing diesel engines for port power for shipping (Vaishnav et al., 2016). Furthermore, there are cases where the RCMderived social cost estimates should be applied with more caution, including when changes in emission occur for only a few days per year (e.g., Gilmore et al., 2010) and when there is the potential for non-linearity or if the change in emissions is large enough to change the underlying chemical regimes (see Holt et al., 2015).

While CTMs remain the gold standard for air quality simulation and should continue to be used in many regulatory settings, e.g., SIPs and regulatory impact assessments (RIAs) of major new rules, the ease-of-use of RCMs means that they can be used by a broad range of researchers and analysts. This may include initial scoping of new rules or regulations as well as decisionmaking in a large number of analyses where air pollution public health costs are not routinely considered in a rigorous and explicit fashion. Because the social cost estimates from these RCMs are sensible and generally consistent and because they are far simpler to use than a CTM, we

encourage researchers and analysts to use them in a broad range of applications when air pollution public health impacts may be important. Additionally, RCMs may open up more opportunities for assessing uncertainty. For example, in a CTM, it is impractical to conduct a Monte Carlo type approach to capture the uncertainty in the emission inventories. As RCMs are computational less expensive, these types of analyses could be implemented. Finally, the successful development of RCMs for the U.S. suggests that they might be developed and applied to other regions of the globe where air quality issues are more severe; however, this requires both suitable models and data. and the test of the measure in the intervalse in the state of the state of the state of the minimum properties and intervalse the comparation of the MA center of the minimum contents and the minimum contents of the minimu

Figure 1: Box plot of the marginal social costs (in USD/tonne) for ground and elevated source emissions across all US counties by pollutant and by air quality model. Red dots and lines indicate emission-weighted mean and median, respectively. The left and right boxes are the 25th and $75th$ percentiles and the whiskers are the $2.5th$ and $97.5th$ percentiles. See Supplemental Information (Table S1) for tabulated values.

Figure 2: Marginal social costs for ground-level emissions for each US County by pollutant and by air quality model (in USD/tonne). Negative values are in shown in green.

Figure 3: Comparison of marginal social costs from primary PM_{2.5} for ground-level emissions. Panels a, c, and e show the ratio of the social cost estimates for each county for each model pair. White counties indicate agreement within a factor of two. In panels b, d and f, the social costs of emissions (in USD/tonne) by county are plotted for each model pair to show the overall model agreement. R is the Pearson's correlation coefficient.

Figure 4: Comparison of marginal social costs of ground-level SO_2 emissions. Panels a, c, and e show the ratio of the social cost estimates for each county for each model pair. White counties indicate agreement within a factor of two. In panels b, d and f, the social costs of emissions (in USD/tonne) by county are plotted for each model pair to show the overall model agreement. R is the Pearson's correlation coefficient.

Figure 5: Comparison of marginal social costs of ground-level NO_x emissions. Panels a, c, and e show the ratio of the social cost estimates for each county for each model pair. White counties indicate agreement within a factor of two. In panels b, d and f, the social costs of emissions (in USD/tonne) by county are plotted for each model pair to show the overall model agreement. R is the Pearson's correlation coefficient.

Figure 6: Comparison of marginal social costs of ground-level NH₃ emissions. Panels a, c, and e show the ratio of the social cost estimates for each county for each model pair. White counties indicate agreement within a factor of two. In panels b, d and f, the social costs of emissions (in USD/tonne) by county are plotted for each model pair to show the overall model agreement. R is the Pearson's correlation coefficient.

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