Full of Hot Air? Replicating Estimates of Regulatory Effects on Air Quality

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1 Introduction

Given the large health and environmental tolls of air pollution, how to reduce harmful emissions such as ground level ozone is a key regulatory concern. However, not only is empirical estimation of regulatory effects on air quality in the United States complicated by wide industrial and political heterogeneity, to model complex interactions between pollution and weather systems is a notoriously difficult statistical and meteorological challenge.

Using econometric methods, Maximilian Auffhammer and Ryan Kellogg (2011), henceforth AK, seek to identify the casual effects of gasoline content regulation on ground level ozone concentrations in the United States. They examine the effect of three regulations in particular: federal Reid vapor pressure (RVP) regulation, federal reformulated gasoline (RFG), and California reformulated gasoline (CARB).

Federal RVP regulations limited the intensity of emissions from gasoline sold during the summer months without restrictions on the chemical composition of emissions. The policy was implemented in two phases. Phase I was enforced between 1989 to 1991 and limited emissions RVP to either 10.5, 9.5 or 9.0 psi across different counties. Phase II began in 1992 and enforces a summer RVP limit of either 9.0 and 7.8 psi.

Federal RFG was enforced since 1995 in areas of severe nonattainment of EPA air quality standards. RFG regulation targets the chemical content of emissions, and has a stricter content and performance criteria than both phases of RVP.

CARB, California's own reformulated gasoline program that began enforcement in 1996, expanded on federal RFG regulations and is the most stringent regulatory treatment examined.

Using panel data from weather monitors tracking ground-level ozone concentrations, AK estimate the effects using both difference-in-differences (DD) and regression discontinuity design (RD) approaches. They find that federal gasoline standards allowing flexible compliance did not improve air quality, while chemical content regulation was able to improve air quality. Gasoline refiners are market agents most affected by such regulations, and AK argue that the flexibility of non-content specific federal emission standards allow refiners to reduce the cost of compliance to regulation without actually reducing emissions.

I replicate AK's main empirical results and explore the robustness of their process and estimates. While their reasoning of the differential effectiveness of air quality regulations are credible, their implementation of econometric techniques on studying air quality regulation outcomes raises many issues of the internal and external validity.

2 Data Preparation

AK use data on ozone concentrations from the Environmental Protection Agency's (EPA) Air Quality Standards Database for 1989-2003. The panel data tracks daily maximum ozone concentration levels recorded by pollution monitors across 49 states. They also combine these air quality observations with weather data from the National Climatic Data Center's Cooperative Station Data (NOAA 2008).

AK perform several important data processing steps in preparation for their DD estimation, some of which appear discretionary. First, they remove data points from less than nine hours of observations between 9 AM and 9 PM according to EPA standards. Second, they keep data only on monitors with more than 75% observed days in each season. AK does not motivate the use of the 75% threshold.

Third, to rule out potential spill-over effects and contaminated measurements, AK drop data from counties neighboring other counties under more stringent regulation. There may be a minor error in AK's Stata code when merging the treated-neighbor dataset.¹ I correct this merging procedure and check the robustness of the estimates with the adjusted data sample.

Since RVP and some aspects of RFG are enforced only between summer months from June 1st and August 31st, AK keep only observations during these months for their DD estimation. Lastly, they remove observations without weather data from NOAA.

AK also construct complex weather, region, and time covariates for their estimations. Weather variables include cubic temperature polynomials, quadratics in rain and snow, lagged temperature variables. Monitors are assigned to one of four US census regions. Time variables include day of week and day of year. They also create many variables interactions, including weather with day of week, and linear and quadratic regulation-region trends.

AK reports yearly tabulations of their processed DD data sample with 1,144,025 total observations, which I replicate sample used in Table 1. Our total and yearly observations are the same. However, due to changes in the order of data processing in my replication, the composition of the treatment groups tabulations differ slightly. This difference may be indicative of the sensitivity of the resulting data to relatively minor changes in the complex cleaning process.

The replicated yearly tabulations by treatment groups are also summarized in Table 1. It is important to note that the baseline group are all monitors in counties with a 9.0 psi RVP limit. This means that no units in the data are untreated with any regulation. In fact, monitors in counties subject to a the baseline 9.0 psi RVP follow a more stringent standard than those in the RVP Phase I treatment group, which follow RVP limits of only 9.5 or 10.0 psi. Assuming the 9.0 psi baseline treatment has an effect in the same direction as the other treatments, the DD model would underestimate the effects of the non-baseline treatments on the outcome variables (Fricke 2017).

In the next section I discuss the empirical strategies of AK's DD implementation and my robustness checks.

3 Difference-in-Differences (DD) Strategies

In this section I summarize AK's main DD strategies. Then I discuss the adjustments I make on the AK's model specifications to test the the robustness of their implementation. Lastly, I introduce the staggered DD estimation strategy I use to test the validity of AK's identifying assumption for casual DD estimates. The staggered DD estimates period effects on air quality before and after the treatment begins. Testing if the pre-treatment effects are statistically zero verifies that the parallel trends assumptions are

¹ After merging by county using AER20090377_NeighborData.dta, AK keeps only not matched counties from the master data. The correct process should be to drop the treated neighbors in the matched counties and the not matched observations from the using data.

Table 1—Replicated Summary Statistics on Monitor and Regulations for Summer Ozone Season

	Daily	У	Counts of ac	tive moni	tors	1	Counts of	treatments	<u> </u>
	Observations	Counties	Total monitors	Urban	Rural	RVPI ^a	RVPII ^b	RFG95	CARB
1989	63,076	418	720	153	244	326			
1990	66,108	436	751	157	268	343			
1991	69,164	451	782	151	297	369			
1992	69,848	452	789	155	300		129		
1993	72,606	469	815	167	301		133		
1994	$74,\!440$	473	835	163	316		135		
1995	77,007	477	865	170	330		103	107	
1996	$76,\!462$	471	854	165	330		66	99	48
1997	$78,\!283$	478	873	166	336		64	101	47
1998	$79,\!544$	487	889	165	344		67	97	47
1999	80,750	485	899	168	344		67	97	47
2000	82,466	489	915	178	346		71	90	46
2001	83,781	490	929	178	355		69	89	45
2002	85,230	495	943	177	361		69	87	47
2003	85,260	498	945	180	362		67	87	48
Total	$1,\!144,\!025$	7,069	12,804	2,493	4,834	1,038	1,040	854	375

Notes: Data constructed by removing (i) observations with less than 9 hours between 9 AM and 9 PM; (ii) monitors with less than 75% of observed summer days; (iii) observations missing weather or income; (iv) counties with more stringently regulated neighbors; (v) observations outside of summer months. AK remove data in the following order: (i) (ii) (iv) (iii), and (v).

not violated.

AK estimate a basic DD model with a log-linear specification,

$$\ln(y_{it}) = \alpha \cdot \mathbf{Treat}_{ct} + \mu_i + \eta_{ry} + \varepsilon_{it}, \tag{1}$$

for monitor i in county c, where y_{it} is the ozone dependent variable, \mathbf{Treat}_{ct} is the vector of treatment indicators at date t in county c, μ_i is the monitor fixed effect and η_{ry} is the region-year fixed effect. The identification assumption for the causal estimate of $\boldsymbol{\alpha}$ is that $E[\mathbf{Treat}_{ct} \cdot \varepsilon_{it} | \mu_i, \eta_{ry}] = 0$.

AK also estimates equation (2) which adds various control variables discussed in the previous section.

$$\ln(y_{it}) = \boldsymbol{\alpha} \cdot \mathbf{Treat}_{ct} + \boldsymbol{\beta} \cdot \mathbf{W}_{it} + \boldsymbol{\gamma}_r \cdot \mathbf{D}_t + \delta \cdot \mathbf{I}_{ct}$$

$$+ \boldsymbol{\theta} \cdot \mathbf{Trend}_{rct} + \mu_i + \eta_{ry} + \varepsilon_{it}.$$
(2)

The variables \mathbf{W}_{it} control for monitor specific weather shocks with lags and interactions, \mathbf{D}_t denotes day-of-week and day-of-year, \mathbf{I}_{ct} denotes county-level income, and \mathbf{Trend}_{rct} controls for linear time trends in each county and census region. Similar to equation (1), then identifying assumption for causal estimate of $\boldsymbol{\alpha}$ in equation (2) is that the unobserved factors are not correlated with treatment, i.e. $E[\mathbf{Treat}_{ct} \cdot \varepsilon_{it} | \mathbf{W}_{it}, \mathbf{D}_t, \mathbf{I}_{ct}, \mathbf{Trend}_{rct}, \mu_i, \eta_{ry}] = 0.$

AK estimates equations (1) and (2) with both the full sample of monitors and a restricted sample of monitors with observation in each year of the 15-years time span in the data. They cluster by state-year to allow for correlation within state-year cells, including within-year serial correlation and within-state cross-sectional correlation.

Additionally, AK's Stata code differences the dependent, treatment, and certain control variables with their monitor-specific means. This procedure is strange since AK does not mention this transformation

^aThe RVPI Column lists number of counties with a 9.5 or 10.5 psi RVP requirement.

^bThe RVPII Column lists number of counties with a below 7.8 psi RVP requirement.

in their paper and do not implemented it in the RD estimation. The main motivation of this step is likely to improve the computational efficiency and accuracy of the estimates. I check the robustness of the results without this mean-difference step. The conceptual empirical implications is apparently simple², but as shown in this next section this step significantly impacts the DD results.

Another interpretation of the identifying assumptions for equations (1) and (2) is the parallel trends assumption, which requires that the level difference between the treated and baseline group outcomes are constant across time in the absence of treatment. Although the parallel trends cannot be verified in the post-treatment periods due to the unobservable counter-factuals, the pre-treatment trends can be checked to verify that the treated and baseline groups are suitable for a DD estimation. AK plots the residuals of ozone concentrations removing weather shocks, which can serve as an "eyeball test" of parallel pre-trends. I attempt to verify the pre-trend requirement more explicitly by estimating equation (3), a staggered extension of AK's DD specification, and testing whether the pre-treatment coefficients are jointly zero.

$$\ln y_{it} = \sum_{j=-\underline{j}}^{\overline{j}} \boldsymbol{\alpha}_j \cdot \mathbf{Z}_{ct}^j + \boldsymbol{\beta} \cdot \mathbf{W}_{it} + \boldsymbol{\gamma}_r \cdot \mathbf{D}_t + \delta \cdot \mathbf{I}_{ct}$$

$$+ \boldsymbol{\theta} \cdot \mathbf{Trend}_{rct} + \mu_i + \eta_{ru} + \varepsilon_{it},$$
(3)

In equation (3), t is the time period in months, \underline{j} and \overline{j} are the number of leads months before treatment and lag months after treatment, \mathbf{Z}_{ct}^j are indicators for $t-j=T_c^0$ in the treated county c, and T_c^0 is the initial treatment month in county c. All variables index by t are monthly panel means of the original daily data. If the parallel trends hold in the pre-treatment periods, we should see that lead period estimates should be statistically zero, i.e. $\alpha_{-\underline{j}} = \alpha_{-\underline{j}+1} = \dots = \alpha_{-1} = 0$. In the next section I report the results of the replicated and robustness check DD estimations.

4 Difference-in-Differences Results

Table 2 columns (1) to (4) report my replicated results of the original estimates, which are columns (1) and (5) of the full sample estimates in AK's Table 2 and the estimates of the restricted sample of monitors in AK's Table 4. In columns (5) to (8) I replicate the same results without performing monitor-mean differences to check the sensitivity of the results to this panel-level transformation. Lastly, in columns (9) to (12) I estimate the DD treatment effects without mean differences and correcting the treated neighbor merge error, which adds an additional 60,986 observations in the full sample and 11,989 observations in the restricted sample. This coding correction also tests the robustness of AK's results to sampling.

In columns (1) and (2), I report my replicated results with the full monitor sample. Column (1) uses the simple DD specification from equation (1) and column (2) uses the specification with the full set of weather, time, and geographic controls from equation (2). All estimates in Table 2 are compared against a baseline of 9.0 psi summer RVP limit. This is notable since if the 9.0 psi RVP baseline reduces ozone concentrations, the effect of the other treatments on reducing ozone levels will be underestimated from an untreated outcome (Fricke 2017). Perhaps unsurprisingly, AK finds positive though statistically insignificant effects of RVP Phase I (RVP I) on log ozone, the 9.0 psi RVP baseline is a more stringent limit than the 9.5 and 10.5 psi RVP I treatment. For the 7.8 psi RVP Phase II (RVP II), AK finds negative and insignificant effects. Federal RFG has an estimated effect of -0.029 reduction in log ozone

²With the monitor mean-difference transformation, AK actually estimates the equation $\ln(y_{it}) - \bar{y}_i = \boldsymbol{\alpha} \cdot (\mathbf{Treat}_{ct} - \bar{\mathbf{Treat}}_i) + \boldsymbol{\zeta}_{irct} - \bar{\boldsymbol{\zeta}}_i + \varepsilon_{it}$, where $\boldsymbol{\zeta}_{irct}$ is the combined covariates. This is the same as estimating the original equations with a monitor-specific constant, $\ln(y_{it}) = \boldsymbol{\alpha} \cdot \mathbf{Treat}_{ct} + \boldsymbol{\zeta}_{irct} + \varepsilon_{it} + K_i$, where $K_i = \bar{y}_i - \boldsymbol{\alpha} \bar{\mathbf{Treat}}_i - \bar{\boldsymbol{\zeta}}_i$ is a constant for monitor i across time.

at the 0.05 significance level under the simple DD estimation in column (1). However, it loses statistical significance under the full controls in column (2). CARB gasoline has a comparative effect of between -0.095 and -0.065 in the simple and full control DD specifications, which are respectively significant at the 1% and 5% level.

Columns (3) and (4) estimates the same specifications as in columns (1) and (2) on a restricted sample of monitors with data spanning all 15 years of observation between 1989 to 2003. The results are similar for RVP II and RFG. Point estimates for the effect of CARB on reducing ozone increase to -0.148 and -0.123 for the simple and full control DD models, and both significant at the 1% level. Point estimates for RVP Phase I are still insignificant, though the signs change from positive to negative.

In columns (5) to (8), I repeat the same estimations from columns (1) to (4) without applying the monitor-mean difference. This dramatically reduces the statistical significance of the estimates, though intuition suggests that the monitor-mean difference should only affect the monitor fixed effect estimates. The standard error increases dramatically for all treatment point estimates. The effects for CARB drop close to zero except for the full-covariate restricted-sample estimate in column (8), which is significant at the 5% level with a similar point estimate with its mean-difference counterpart in column (4). Point estimates for RVP I from the simple DD specification in columns (5) and (7) become large but very imprecise. Since the DD results appear highly sensitive to the mean-differencing procedure, AK should have provided their empirical motivation of the mean-difference process.

In columns (9) to (12) I repeat the same estimations as in columns (5) to (8), correcting for AK's potential coding error when eliminating more strictly treated neighbors. This adjustment increases the full sample from 1,144,025 to 1,205,011 observations and the 15-year monitors sample from 455,084 to 467,073 observations. The results are similar to those in columns (5) to (8), which suggests that the results are not sensitive to this particular sample adjustment.

Table 2—Difference-in-Differences: Replication and Robustness Checks Results

	Full sa	mple	All year r	nonitors	Full s	ample	All year	monitors	Full sa	mple	All year	monitors
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)
RVPI (9.5, 10.5 psi)	0.016 (0.016)	0.005 (0.017)	-0.009 (0.015)	-0.014 (0.018)	-0.743 (0.406)	0.018 (0.026)	-0.927 (0.517)	-0.012 (0.023)	-0.721 (0.400)	0.019 (0.024)	-0.868 (0.505)	0.011 (0.018)
RVPII (7.8 psi)	-0.007 (0.008)	-0.012 (0.011)	-0.009 (0.009)	-0.022 (0.013)	-0.008 (0.014)	0.015 (0.018)	-0.018 (0.014)	-0.003 (0.021)	0.002 (0.014)	0.014 (0.018)	-0.015 (0.014)	-0.002 (0.021)
Federal RFG	-0.029** (0.009)	-0.018 (0.012)	-0.031** (0.010)	-0.030* (0.014)	0.042* (0.017)	-0.031 (0.023)	0.029 (0.017)	-0.048 (0.025)	0.054*** (0.016)	-0.026 (0.022)	0.038* (0.017)	-0.044 (0.025)
CARB Gasoline	-0.095*** (0.013)	-0.065** (0.020)	-0.148*** (0.014)	* -0.123*** (0.025)	-0.002 (0.023)	-0.013 (0.034)	0.003 (0.023)	-0.118** (0.040)	0.004 (0.023)	-0.012 (0.033)	$0.005 \\ (0.022)$	-0.117** (0.040)
Income		-0.299 (0.234)		-0.407 (0.245)		-0.715*** (0.099)	*	-0.594*** (0.088)	*	-0.705*** (0.096)		-0.596*** (0.088)
Monitor FEs	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Region-Year FEs	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Full controls	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes
Mean Difference	Yes	Yes	Yes	Yes	No	No	No	No	No	No	No	No
Corrected Merge	No	No	No	No	No	No	No	No	Yes	Yes	Yes	Yes
Observations	1,144,025	1,144,025	455,084	455,084	1,144,025	1,144,025	455,084	455,084	1,205,011	1,205,011	467,073	467,073

Notes: This table shows coefficients estimated from OLS regressions of the indicated dependent variable on \log daily maximum ozone concentrations. Standard errors clustered by state-year are in parentheses. All regulatory effects are relative to the 9.0 psi RVP baseline. The sample only contains data from summer months, between June 1st and August 31st. Columns 1 and 2 replicate AK equation (1). Columns 3 and 4 replicate AK equation (2). Columns 5, 6, 7, and 8 replicate AK without monitor-mean differenceing. Columns 9, 10, 11, and 12 replicate AK correcting the treated neighbor merge error and without monitor-mean differencing. Stars indicate the following p-values: *** p<0.01, *** p<0.05, * p<0.10.

I also conduct a robustness check of parallel pre-trends by examining the pre-treatment lead estimates in a staggered DD estimation on monthly summer data. I exclude RVP I from the staggered implementation since there is no data is available before 1989, when RVP I regulations began. The results of the staggered implementation are illustrated in Figure 1 and the full set of estimates are reported in Table A1 of the appendix. The appendix table also reports the F-tests results with null hypotheses of jointly

zero pre-treatment estimates.

The first row of Figure 1 shows the period estimates with a window of three months before and after treatment for RVP II, RFG, and CARB. The second and third rows use six-month and twelve-month windows before and after treatment. Point estimates plots are connected with blue lines and the 95% confidence interval bounds³ are plotted with the red lines.

For RVP II and RFG, the pre-trend confidence intervals contain zero in most cases, except for a few periods in the 12-month window specifications. Other than the 12-month window estimates, the p-values of jointly zero test indicate pre-trend effects cannot be rejected at the five-percent level except in one specification, RFG's 1-month window estimates with full controls in column (8) of Table A1. Ignoring 12-month window estimates, these pre-trends estimates provide some support for the parallel pre-trends requirement for the causal identifying assumptions of RVP II and RFG, though the post-treatment effects are also non-significant.

For CARB, the pre-trends estimate significantly depart from zero in all window specifications. Jointly zero pre-treatment effects can be rejected at less than the one-percent level for all staggered DD estimates. This provides evidence that the pre-trends are not parallel for CARB and its baseline, which casts doubt on the identifying assumption for estimating causal of effects of CARB using a DD approach.

From the post-treatment lag coefficients in Figure 1, effects similar to AK's original DD specification are observed. RVP II and RFG have zero post-treatment coefficients in almost all cases, while CARB has significant negative coefficients. However, since the pre-trends coefficients are not zero for CARB, its RD estimates are likely not appropriate for causal interpretations.

5 Regression Discontinuity (RD) Designs

AK also implement a regression discontinuity design to allow for a more flexible model and to capture the spatial heterogeneity of the regulatory effects. They estimate the regression

$$\ln(y_{it}) = \alpha_i \cdot \mathbf{Treat}_{ct} + \beta \cdot \mathbf{W}_{it} + f_i(Date_i) + \mu_i + \varepsilon_{it}, \tag{4}$$

for each monitor i where more than 75% of days within the monitor's date range is observed across dates t, in seasons where more than 75% of days are observed. The vector \mathbf{Treat}_{ct} is derived from the treatment indicators, using a 30 day linear phase-in period where each treatment variable increases from 0 to 1 within the 30 day period leading up to the treatment. The treatment variables in \mathbf{Treat}_{ct} are RVP II, RFG, CARB, and combined RVP II and RFG. RVP I is not included in the RD implementation because there are no observations in the data before the treatment.

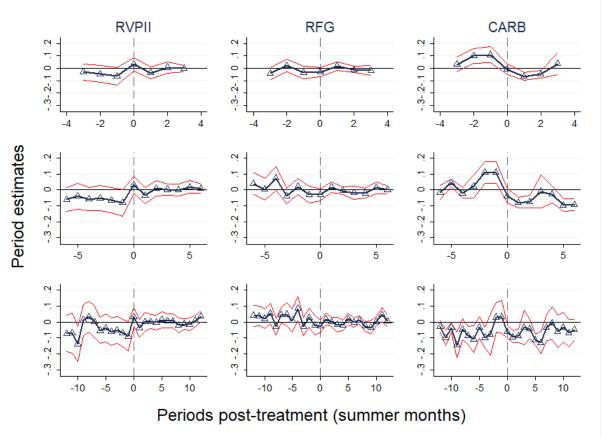
Ak uses a similar set of W_{it} weather and time covariates from the DD implementation. Region covariates are not used since the model is estimated for each monitor, and there are no geographic variation within each monitor's observations.

AK models the running variable $Date_i$ with an eighth order Chebychev polynomial. The n-th order polynomial terms $P_n(Date_i)$ are generated with a recurrence relation, where $T_0(x) = 0, T_1(x) = x$, and $T_n(x) = 2xT_{n-1}(x) - T_{n-2}(x)$ for $n \ge 2$.

AK's RD implementation is highly complex due to the numerousness of monitor-specific estimates, the treatment linear phase-in, and the use of the Chebychev polynomial. The monitor-specific approach makes general interpretations of the treatment effects difficult since AK suggests no method of aggregating the estimates for each treatment other than taking the simple mean of the point estimates, which ignore the estimates' standard errors. The linear phase-in treatment conflicts with the main motivation

 $^{^3}$ The 95% confidence intervals are calculated by multiplying 1.96 with the standard errors, and adding and subtracting from the point estimates.

Figure 1—Staggered Difference-in-Differences Estimates and Trends



Notes: The first row contains 3-month leads and lag estimates for all treatments from the staggered DD equation (3). The second and third row contain the 6 and 12-month estimates, respectively. The 95% confidence intervals are plotted with red lines. Point estimates and F-test results are reported in appendix Table A1.

of estimating RD regressions, which is to exploit discontinuities in outcomes around cutoffs in treatment running variables. The use of the high-ordered global polynomial model also raises issues of overfitting (Hausman and Rapson, 2018).

My replication of the AK's RD results are reported in the next section. To check the robustness of AK's complex RD implementation, I also propose and estimate a more standard RD implementation with equation (5), which groups the monitors by treatment.

$$\ln(y_{it}) = \gamma \cdot \text{Treat}_{ct} + \beta \cdot \mathbf{W}_{it} + \delta_1 t + \varepsilon_{it}. \tag{5}$$

In equation (5), t is the normalized daily post-treatment period where t = 0 is the time of treatment, and Treat_{ct} is a scalar treatment variable with a 30-day linear phase-in. The phase-in is necessary to create any significant estimates with daily data, but I discuss the validity of this transformation in the results section.

I estimate this treatment-specific RD model with a three-month bandwidth before and after treatment to estimate the local discontinuity effect at the regulation start dates. AK's RD global polynomial estimates use the full 15-year sample. This large bandwidth combined with the high-ordered global polynomial estimation likely allow AK's RD specification to overfit the data, producing non-meaningful estimates (Hausman and Rapson, 2018).

I also estimate the RD with first to third-order polynomials of t allowing for differential terms before and after treatment. The regression equation for each of the n-th order polynomial specifications are

given by

$$\ln(y_{it}) = \gamma \cdot \text{Treat}_{ct} + \beta \cdot \mathbf{W}_{it} + \sum_{m=1}^{n} \left(\delta_j t^m + \sigma_j \text{Treat}_{ct} t^m \right) + \varepsilon_{it}.$$
 (6)

Though this specification may not be optimal for this setting, I believe RD estimates on each treatment group instead of on each monitor allow clearer interpretations of the RD treatment effects and their validity.

6 Regression Discontinuity Results

Tables A2 to A5 in the appendix report the replicated results of AK's RD specification for each monitor. Figure 2 shows the frequency distribution and Epanechnikov kernel-smoothed distribution of the replicated monitor-specific RD estimates with the full sample of locations. The mean effects for RVP II, RFG, and CARB on log ozone are -0.0032, -0.453, and -0.0608 respectively, compared to AK's reported mean RD treatment effects of -0.0001, -0.021, and -0.060.

The mean results for RFG and CARB deviate significantly from AK's DD estimates. AK argue that the monitor-specific RVP results are confounded by NO_x regulations and that the CARB results are spatially heterogeneous. Though AK's monitors-specific findings provide insight about the heterogeneity of the treatment effects, the large number of estimates from Tables A2 to A5 are difficult to interpret. To my knowledge, the means of the point estimates are not readily useful in interpreting the causal effect of the treatments. To report the estimate for any specific monitor as a representative of the entire treatment group is also unconvincing.

To evaluate the robustness of the RD approach in this setting, I also estimate a more traditional treatment-grouped RD specification according to equations (5) and (6) with first, second, and third polynomial orders. The results are reported in Table 3.

Columns (1) to (4) of Table 3 report the estimated RD treatment effects for all monitors in counties subject to RVP II in the data. The estimated treatments lose statistical power compared to AK's DD estimates. The RVP treatment effects vary significantly with changes in polynomial order. Estimated RVP effects on log ozone range from -0.045 to -0.137, and are not statistically significant at the 10% level.

Columns (5) to (8) report the RFG RD treatment effects, which range from -0.128 to -0.142. The simple linear-trend results in column (5) estimated from equation (5) is significant at the 5% level. The differential polynomial treatments estimates with equation (6) specifications are significant at the 10% level.

Columns (9) to (12) report the CARB treatment effects, which differ dramatically from AK's mean monitor-specific results. The point estimates range from 0.395 to 0.410 and are significant at the 5% level. These are quite large effects in the opposite sign the mean of AK's monitor-specific results.

The treatment-grouped specification from equations (5) and (6) adhere more closely to the standard RD strategy than AK's parameterization in (4). The standard specification results are less likely to be overfitted and perhaps are conceptually clearer. Although the standard RD specifications likely do not optimize the statistical power of the estimations, the non-significant results may indicate that a discontinuity approach is inappropriate to estimate regulatory effects on air quality. Since time and cost intensive planning and investments are likely required to adhere to new regulations, refiners likely do not adopt to new regulations sharply at the cutoff.

ω mean = -.0032Density 2 4 6 0 -.6 -.4 0 .2 RD RVPII effect ω mean = -.0453 Density 2 4 6 N 0 -.6 -.4 -.2 RD RFG effect 0 .2 mean = -0608Density 2 4 6 N 0 -.2 RD CARB effect -.6 -.4 0 .2

Figure 2—Monitor Regression Discontinuity Kernel Density

Notes: The bars plots show the frequency of the estimated treatment effects from equation (4). The red lines show the smoothed cross-monitor distribution of the estimates using a Epanechnikov kernel with a bandwidth of 0.05.

RVP Phase II RFG Federal CARB Gasoline (1) (3) (4) (10)(12)(2)(5)(6)(8)(11)Treatment Estimate -0.045 -0.106 -0.130* 0.457 0.438 0.410*-0.106-0.137-0.140* -0.128 -0.142° 0.395*(0.128)(0.124)(0.127)(0.120)(0.020)(0.036)(0.038)(0.042)(0.056)(0.107)(0.110)(0.112)Polynomial Order 2 3 2 2 3 3 Differential Slope No Yes Yes Yes No Yes Yes Yes No Yes Yes Yes Full controls Yes 7,863 7,863 7,863 7,863 4,766 4,766 4,766 4,766 16,053 16,053 16,053

Table 3—Regression Discontinuity Results: Replication and Robustness Checks

Notes: This table shows the coefficients of OLS regressions of the indicated regression discontinuity treatment effect on log ozone. The first rows under each treatment header are coefficients estimated from equation (5), and the following coefficients are estimated from equation (6). Standard errors are clustered on year-season. Stars indicate the following p-values: *** p<0.01, ** p<0.05, * p<0.10.

7 Conclusion

In this paper, I replicate and conduct robustness checks on AK's DD and RD estimates of the effect of gasoline-emissions regulation on reducing ground-level ozone concentrations. The specific regulations examined are federal Reid vapor pressure (RVP) standards, federal reformulated gasoline (RFG), and California reformulated gasoline (CARB).

I find that though DD estimates of CARB effects are significant, the identifying assumption required for causal interpretations is likely not satisfied. AK point to the spatial heterogeneity of treatment effects in motivating the RD implementation, but this exact heterogeneity undermines the common-trends assumption for the DD estimations. An alternative estimation strategy could be to create a

synthetic control, not relying any specific baseline monitors to provide a valid parallel trend.

The use of the 9.0 psi RVP baseline in the estimations is also problematic, since all treatment effects are estimated relative to already treated units. AK's conclusions that RVP I and II regulations are ineffective may be misleading. It is quite possible that RVP I and II are effective at reducing ozone concentrations, but that the treat effects are not statistically different from that of the 9.0 psi RVP baseline.

I also find that AK's complex RD implementation is likely not suitable in this setting. Best practices for RD strategy warn that such high-ordered parameterizations and large bandwidths allow the model to overfit the data instead of extracting meaningful estimates.

The use of linear phase-in also complicates RD interpretation. Without this transformation, the discontinuous effects at the daily cut-offs are too small to be estimated. Standard RD specifications are perhaps also not suitable for these estimations since meaningful discontinuities likely do not exist around the cutoff date. AK's monitor-specific approach also obscures the general interpretation of the results, and should probably estimate more general effects of the treatments.

While AK's arguments about regulatory effects on air quality are conceptually credible, my examination of the internal validity of their empirical results raise considerable issues. More advancement in econometrics techniques and better meteorological modeling are likely needed to address the estimation challenges posed by large spatial heterogeneity and complex weather interactions.

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Appendix

Table A1—Staggered Difference-in-Differences Estimates

	RVP Phase II					RFG Federal				CARB Gasoline								
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)
$\alpha_{\hat{t}=-12}$					-0.082 (0.072)	-0.073 (0.058)					-0.071 (0.099)	0.040 (0.034)					-0.080*** (0.006)	-0.028 (0.017)
$\alpha_{\hat{t}=-11}$					-0.093 (0.057)	-0.069 (0.063)					-0.031 (0.095)	0.038 (0.031)					-0.039** (0.012)	-0.099** (0.024)
$\alpha_{\hat{t}=-10}$					-0.184** (0.062)	-0.138* (0.056)					-0.046 (0.096)	0.021 (0.031)					0.080*** (0.003)	-0.035* (0.015)
$\alpha_{\hat{t}=-9}$					-0.052 (0.045)	0.012 (0.049)					-0.096 (0.145)	0.055 (0.032)					-0.091** (0.029)	-0.145** (0.041)
$\alpha_{\hat{t}=-8}$					0.027 (0.050)	$0.033 \\ (0.049)$					-0.154 (0.139)	-0.029 (0.026)					-0.116** (0.032)	-0.045 (0.035)
$\alpha_{t=-7}$					-0.014 (0.047)	$0.001 \\ (0.051)$					-0.091 (0.143)	0.044 (0.025)					-0.086* (0.035)	-0.085* (0.030)
$\alpha_{t=-6}$			-0.033 (0.035)	-0.060 (0.038)	-0.039 (0.041)	-0.054 (0.042)			-0.007 (0.038)	0.038 (0.035)	-0.038 (0.058)	$0.048 \\ (0.037)$			-0.040 (0.066)	-0.017 (0.023)	-0.116** (0.033)	-0.108* (0.043)
$\alpha_{\hat{t}=-5}$			-0.022 (0.041)	-0.040 (0.041)	-0.028 (0.048)	-0.038 (0.045)			-0.006 (0.046)	$0.003 \\ (0.035)$	-0.037 (0.064)	$0.009 \\ (0.037)$			-0.068 (0.066)	0.045** (0.013)	-0.143*** (0.033)	-0.033 (0.035)
$\alpha_{\hat{t}=-4}$			-0.029 (0.043)	-0.059 (0.038)	-0.035 (0.049)	-0.062 (0.044)			0.057 (0.042)	0.073 (0.038)	0.026 (0.060)	0.083* (0.040)			-0.037 (0.066)	-0.020 (0.017)	-0.113** (0.033)	-0.098* (0.033)
$\alpha_{t=-3}$	-0.059 (0.037)	-0.031 (0.033)	-0.068 (0.040)	-0.051 (0.040)	-0.075 (0.043)	-0.052 (0.043)	0.013 (0.048)	-0.041 (0.024)	0.014 (0.049)	-0.039 (0.025)	-0.006 (0.059)	-0.027 (0.029)	-0.180*** (0.008)	0.031 (0.031)	-0.218** (0.057)	0.022 (0.037)	-0.299*** (0.028)	-0.078 (0.066)
$\alpha_{\hat{t}=-2}$	-0.018 (0.041)	-0.046 (0.035)	-0.027 (0.045)	-0.065 (0.041)	-0.034 (0.047)	-0.069 (0.043)	0.024 (0.051)	0.022 (0.025)	$0.025 \\ (0.051)$	0.021 (0.026)	$0.005 \\ (0.062)$	0.029 (0.030)	-0.079*** (0.006)	0.099** (0.031)	-0.118 (0.056)	0.110** (0.034)	-0.198*** (0.026)	0.030 (0.047)
$\alpha_{\hat{t}=-1}$	-0.023 (0.037)	-0.063 (0.036)	-0.032 (0.042)	-0.081 (0.043)	-0.039 (0.045)	-0.091 (0.047)	-0.017 (0.054)	-0.036 (0.026)	-0.017 (0.055)	-0.029 (0.027)	-0.036 (0.065)	-0.019 (0.031)	-0.055*** (0.006)	0.108** (0.033)	-0.094 (0.056)	0.108** (0.035)	-0.174*** (0.026)	0.031 (0.053)
$\alpha_{t=0}$	-0.020 (0.035)	0.031 (0.027)	-0.011 (0.035)	0.032 (0.028)	-0.011 (0.037)	0.033 (0.031)	-0.061** (0.023)	-0.032 (0.019)	-0.061** (0.023)	-0.032 (0.019)	-0.074* (0.032)	-0.027 (0.020)	-0.071 (0.038)	-0.010 (0.022)	-0.079** (0.026)	-0.039 (0.022)	-0.066 (0.034)	-0.061* (0.021)
$\alpha_{t=1}$	-0.014 (0.025)	-0.037 (0.024)	-0.006 (0.024)	-0.036 (0.025)	-0.005 (0.026)	-0.038 (0.028)	0.034 (0.023)	0.019 (0.017)	0.034 (0.023)	$0.016 \\ (0.017)$	0.022 (0.032)	0.018 (0.019)	-0.061 (0.040)	-0.066*** (0.015)	-0.070* (0.025)	-0.080*** (0.016)	(0.035)	-0.093** (0.019)
$\alpha_{t=2}$	0.068* (0.027)	0.007 (0.023)	0.076** (0.027)	* 0.009 (0.025)	0.077** (0.029)	$0.002 \\ (0.030)$	-0.009 (0.024)	-0.011 (0.013)	-0.009 (0.024)	-0.006 (0.013)	-0.021 (0.033)	$0.001 \\ (0.015)$	-0.035 (0.042)	-0.047** (0.015)	-0.044 (0.027)	-0.074** (0.021)	-0.031 (0.036)	-0.085** (0.022)
$\alpha_{t=3}$	-0.015 (0.017)	-0.001 (0.013)	0.005 (0.027)	0.002 (0.018)	0.007 (0.028)	0.003 (0.023)	-0.015 (0.015)	-0.019 (0.020)	-0.013 (0.022)	-0.020 (0.021)	-0.024 (0.030)	-0.017 (0.023)	-0.064** (0.022)	0.036 (0.044)	-0.073 (0.060)	-0.010 (0.054)	-0.054 (0.038)	-0.034 (0.055)
$\alpha_{t=4}$			0.016 (0.023)	-0.001 (0.020)	0.018 (0.025)	-0.003 (0.024)			-0.015 (0.023)	-0.020 (0.016)	-0.027 (0.031)	-0.021 (0.017)			0.009 (0.052)	-0.028 (0.027)	0.028 (0.031)	-0.044 (0.030)
$\alpha_{t=5}$			0.058* (0.029)	0.019 (0.020)	0.060 (0.031)	0.013 (0.026)			0.021 (0.024)	0.013 (0.019)	0.009 (0.032)	0.020 (0.019)			-0.012 (0.043)	-0.096*** (0.021)	(0.024)	-0.112** (0.018)
$\alpha_{t=6}$			0.019 (0.013)	0.007 (0.015)	0.026 (0.021)	0.008 (0.022)			-0.011 (0.023)	-0.001 (0.013)	-0.016 (0.026)	-0.003 (0.015)			-0.171* (0.061)	-0.093*** (0.019)	(0.045)	-0.129** (0.035)
$\alpha_{t=7}$					-0.004 (0.025)	0.007 (0.022)					0.034 (0.022)	0.011 (0.013)					0.018 (0.029)	-0.034 (0.042)
$\alpha_{t=8}$					0.035 (0.022)	-0.020 (0.023)					-0.043 (0.028)	-0.026 (0.016)					0.098* (0.042)	-0.007 (0.053)
$\alpha_{t=9}$					-0.037* (0.019)	-0.013 (0.016)					-0.093** (0.032)	(0.022)					-0.016 (0.033)	-0.058 (0.051)
$\alpha_{t=10}$					0.015 (0.024)	-0.015 (0.020)					0.047* (0.021)	0.003 (0.015)					-0.002 (0.042)	-0.034 (0.047)
$\alpha_{t=11}$					0.041* (0.019)	0.009 (0.018)					0.060 (0.031)	0.047* (0.023)					-0.034 (0.035)	-0.068 (0.044)
$\alpha_{t=12}$					0.003 (0.015)	0.036* (0.017)					-0.011 (0.028)	0.007 (0.019)					0.027* (0.010)	-0.048 (0.033)
income		-0.125 (0.181)		-0.125 (0.180)		-0.122 (0.179)		-0.292** (0.072)		-0.294** (0.073)		-0.299** (0.073)		0.090 (0.203)		0.092 (0.204)		0.091 (0.203)
Window Monitor FEs	±3 Yes	±3 Yes	±6 Yes	±6 Yes	±12 Yes	±12 Yes	±3 Yes	±3 Yes	±6 Yes	±6 Yes	±12 Yes	±12 Yes	±3 Yes	±3 Yes	±6 Yes	±6 Yes	±12 Yes	±12 Yes
Region-Year FEs	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Full controls Mean differenced	No	Yes Yes	No Yes	Yes	No Yes	Yes Yes	No Yes	Yes Yes	No Yes	Yes Yes	No	Yes Yes	No Yes	Yes Yes	No Yes	Yes Yes	No Yes	Yes Yes
Mean differenced Corrected merge	Yes Yes	Yes Yes	Yes Yes	Yes Yes	Yes Yes	Yes	Yes Yes	Yes Yes	Yes Yes	Yes Yes	Yes Yes	Yes Yes						
F-stat	2.4105	1.3001	1.5102	1.2153	4.8075	1.5771	.60230000000000001	2.7839	2.0891	2.1038	2.6686	2.5814	255.1545	5.4445000000000001	455.6928		348.4603	106.9087
P-value	.0668	.2743	.1738	.2977	0	.0963	.614	.0411	.0544	.0527	.002	.0028	0	.0108	0	.0002	0	0

Notes: Effects shown are the estimated coefficients on the treatment dummies of the staggered difference-in-difference specification (3). Standard errors are clustered on state-year. Estimated effects are relative to the baseline of a 9.0 psi RVP standard. Sample uses monthly data from summer months June 1 to August 31. Stars indicate the following p-values: *** p<0.01, ** p<0.05, * p<0.10.

Table A2—Monitor-Specific Regression Discontinuity Estimates for RVP II

Index	State	County	Monitor ID	RD RVPII effect	RVPII standard error	RVPII t-score	RVPII p-value
1	CO	Adams	3001	.057**	.028	2.08	.042
2	CO	Arapahoe	2	.1***	.031	3.252	.002
3	CO	Denver	14	.078*	.041	1.931	.058
4	CO	Jefferson	2	.043	.032	1.33	.188
5	FL	Broward	2003	034	.031	-1.078	.286
6	FL	Broward	8002	111***	.032	-3.462	.001
7	FL	Duval	77	.018	.026	.712	.479
8	FL	Hillsborough	81	.044	.035	1.27	.209
9	FL	Hillsborough	1035	.008	.023	.328	.744
10	FL	Miami-Dade	21	118	.03	-3.956	
11	FL	Miami-Dade	27	079***	.027	-2.903	.005
12	FL	Miami-Dade	29	.015	.035	.438	.663
13	FL	Miami-Dade	30	102**	.044	-2.318	.024
14	FL	Palm Beach	2004	115	.111	-1.043	.301
15	FL	Pinellas	4	019	.027	692	.492
16	$_{\mathrm{FL}}$	Pinellas	18	044	.038	-1.148	.256
17	FL	Pinellas	5002	07**	.034	-2.023	.048
18	IL	Madison	8	.022	.032	.702	.486
19	IL	Madison	1009	.013	.036	.36	.72
20	IL	Madison	2007	.025	.028	.901	.371
21	IL	Madison	3007	.003	.027	.101	.92
22	IL	Saint Clair	10	.069**	.032	2.129	.037
23	LA	Beauregard	2	.006	.054	.116	.908
24	LA	Calcasieu	2	015	.056	267	.79
25	LA	East Baton Rouge	3	.014	.039	.362	.719
26	LA	East Baton Rouge	1001	017	.036	462	.646
27	LA	Grant	1	.003	.035	.099	.922
28	LA	Jefferson	1001	.149***	.042	3.55	.001
29	LA	Orleans	12	066	.047	-1.401	.166
30	LA	Pointe Coupee	1	029	.032	931	.356
			2				
31 32	$_{ m LA}$	St. Bernard	2	086* 049	.048	-1.799	.077
-		St. James			.068	719 .884	.475 .38
33	LA	St. Mary	3	.047	.053		
34	LA	West Baton Rouge	1	06	.039	-1.55	.126
35	NV	Washoe	1005	.033	.032	1.041	.302
36	TN	Davidson	11	.064	.045	1.421	.161
37	TN	Davidson	26	027	.05	545	.588
38	TX	Bexar	32	015	.057	259	.796
39	TX	El Paso	37	.087***	.033	2.676	.01
40	TX	Gregg	1	.014	.031	.444	.658
41	TX	Jefferson	9	099	.066	-1.497	.14
42	TX	Jefferson	11	.084	.065	1.291	.202
43	TX	Nueces	25	013	.045	275	.784
44	TX	Nueces	26	027	.053	515	.609
45	TX	Travis	14	.05	.037	1.348	.183

Notes: Effects shown are the monitor-specific estimated coefficients on the treatment dummies of the regression discontinuity specification (4). Standard errors are clustered on year-season. Estimated effects RVP phase II (less than or equal to 7.8 psi) are relative to the baseline of a 9.0 psi RVP standard. Sample uses data from all seasons of 1989-2003.

Stars indicate the following p-values: *** p<0.01, ** p<0.05, * p<0.10.

Table A3—Monitor-Specific Regression Discontinuity Estimates for RFG

Index	State	County	Monitor ID	RD RFG effect	RFG standard error	RFG t-score	RFG p-value
1	DE	New Castle	1003	118**	.059	-2.012	.049
2	IL	Cook	50	006	.05	125	.901
3	IL	Cook	64	063	.047	-1.345	.184
4	IL	Cook	7002	.066**	.03	2.241	.029
5	IL	DuPage	6001	.03	.027	1.118	.268
6	IL	Kane	5	.082***	.029	2.853	.006
7	IL	Lake	1002	008	.037	222	.825
8	IL	Lake	3001	02	.036	543	.59
9	IL	Will	1008	.07**	.03	2.333	.023
10	MA	Hampden	8	026	.042	624	.535
11	MA	Hampshire	4002	035	.027	-1.311	.195
12	NJ	Atlantic	5	138	.026	-5.396	
13	NJ	Camden	3	048	.034	-1.412	.163
14	NJ	Camden	1001	15	.031	-4.865	
15	NJ	Cumberland	7	119	.025	-4.703	
16	NJ	Gloucester	2	105***	.029	-3.557	.001
17	NJ	Hudson	6	032	.029	-1.097	.278
18	NJ	Hunterdon	1	034	.033	-1.014	.315
19	NJ	Mercer	5	112***	.041	-2.714	.009
20	NJ	Monmouth	5	057*	.029	-1.979	.053
21	NJ	Morris	3001	075**	.033	-2.236	.029
22	NY	Dutchess	7	038	.03	-1.262	.212
23	NY	Essex	2	083***	.023	-3.635	.001
24	NY	Essex	3	073***	.023	-3.14	.003
25	NY	New York	63	094*	.049	-1.917	.06
26	NY	Suffolk	2	081**	.032	-2.529	.014
27	PA	Philadelphia	24	.043	.028	1.5	.139

Notes: Effects shown are the monitor-specific estimated coefficients on the treatment dummies of the regression discontinuity specification (4). Standard errors are clustered on year-season. Estimated effects RFG are relative to the baseline of a 9.0 psi RVP standard. Sample uses data from all seasons of 1989-2003. Stars indicate the following p-values: *** p<0.01, ** p<0.05, * p<0.10.

Table A4—Monitor-Specific Regression Discontinuity Estimates for CARB

Mart	ndex S	State	County	Monitor ID	RD RVPII effect	RD RFG effect	RD CARB effect	RVPII standard error	RFG standard error	CARB standard error	RVPII t-score	RFG t-score	CARB t-score	RVPII p-value	RFG p-value	CARB p-value
1						in a citet			o omnuna error			0 1-3.010		p-range	-a o p-value	.015
				5										.659		.805
S			Alameda	1001												.296
1				2												.43
7				2												.055
8 C. Posser 7 196" 196																.314
10 C. Series 7 10 10 10 10 10 10 10				7	.107***		.193***									.005
11 C. V. Rose S. D. D. Series S. D. D. Series S. D.				4001			.19**									.041
12 C. C. C. C. C. C. C. C		2A		7			116**							.238		.048
13 C. A. Serie	1 (JA.		8	.019		.003	.032		.059	.602		1.052	.549		.959 .291
14 C. Seel C. 14 15 15 15 15 15 15 15	3 0	7A			055**		102			062	2.122		1.631			.108
15 15 15 15 15 15 15 15																.355
15 C. L. La Aughe 16 22 28 144 147 128 344 342 388 361 343 348 347 348														.112		.952
18 C. La Augine 13 01 020 02						.157***			.045							.084
19 C. L. D. Angeles 1902 1.54*** 23*	7 (JA.					129 200888			.088				F00		.146
20	9 C	ZA.			.188***		327**							.004	.001	.017
22 C. La Augules 1301 077			Los Angeles	1103	.255***			.073	.07	.117		.722	-3.856			
22 C. L. Angeles 1901 99 - 9.55		CA														.324
2	2 C	2A	Los Angeles		.077	.043	017	.059	.083	.154	1.3	.511		.199	.611	.912
Secondary Control Co	3 (JA.	Los Angeles		.09*	055	379	.046	.064	.087	1.97	858		.054	.394	.001
28 C A Langeles 9012 303					119**				.058							.001
27 CA Jackages 601 97° - 9.24 - 124																.481
20 CA Marinery 2 Notation 1 881** - 174** 0.67	7 C	CA	Los Angeles	5001	.07*	024	124	.04	.053	.079	1.759	443	-1.566	.084	.659	.123
10 C. A. Mackery 2 Mol. 911 Mol. -915 Mol. -916				6002	.011	194***			.054			-3.618			.001	
1. 1. 1. 1. 1. 1. 1. 1.	9 0	JA.		1	.081**						2.226					.005 .808
32 CA Orange 11 122*** 170*** .96 .966 .966 .118 .2039 2.65 .988 .989 .911 35 CA Orange 2010 .022 .914 .944 .988 .978 .118 .918		JA.														.997
33 C. C. Orange 2010					199**	176***			066			2 665			01	.552
34 CA Orange 5010 .088* .018 .211** .05 .049 .081 .1796 .261** .262** .789 .099 36 CA Riverside .001 .028** .01 .036** .01 .036** .01 .036** .03 .02 .03 .03 .04 .01 .03** .01 .03** .01 .03** .01 .03** .01 .02 .02 .03** .03 .04 .03** .03** .03** .03** .03** .02 .03** .03** .02 .03** .03*							.125									.113
Section			Orange													.011
57 CA Newside 601 1/2*** 0.41 0.1 0.33 .036 0.73 2.958 1.13 .131 .031 .036 2.77 .04 .055 .04 .055 .04 .05			Riverside		.04		366									
S8 CA Riverside 801 .17*** .945 .915 .915 .916 .935 .946 .988 .1.313 .97 .401 .948 .935 80 CA Sternmento 2 .922*** .918***		JA.														.328
30 CA Riverside 901 J°1 J°2 -J°2 0.04 Au D°3 Au 573 2.05 2.27 2.08 2.27 2.28 2.27 2.28 2.27 2.28 2.27 2.28 2.27 2.28 2.27 2.28 2.27 2.28 2.27 2.28 2.27 1.70 2.96 4.20 2.07 2.03 3.08 3.07 2.12 1.88 0.05 1.70 3.08 4.20 3.07 1.88 0.05 3.07 1.88 0.05 3.07 2.12 1.88 0.05 0.05 4.77 2.88 4.15 2.27 1.70 2.08 4.07 3.08 3.08 3.08 3.03 9.08 4.15 1.71 2.88 4.15 6.00 3.03 9.08 4.02 4.07 9.09 0.01 0.01 0.01 0.01 0.01 0.01 0.02 0.02 0.02 0.02 0.02 0.02 0.02 0.02 0.02 <td></td> <td>A.</td> <td></td> <td></td> <td>147***</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>.27 206</td> <td>.896</td>		A.			147***										.27 206	.896
CA Sermento																69
1	0 C	CA	Sacramento	2	.069		.02	.066		.085	1.049		.237	.298		.814
A	1 C	CA					193**			.092	2.193			.032		.039
44 CA San Bentan 3																.446
65 CA Sum Bernardino 1 0.92 -0.17 -0.03 0.19 0.54 .083 .144 -5.54 .1.51 .050 .307 67 CA Sum Bernardino 12 .1** .023 .0.46 .0.48 .0.53 .0.98 .2.55 .4.77 .0.50 .0.11 .0.664 60 CA Sum Bernardino 100 .3.31 .2.*** .0.83 .0.07 .0.11 .0.664 60 CA Sum Bernardino .0.02 .0.01		JA.					.07*									.064 .865
Fig.						0.47			054			954			207	.88
47 CA San Bernardining 12 1** 0.33 -0.94 0.94 0.93 0.94 2.085 4.37 -9.99 0.91 6.06 6.06 6.07 A. 1.34 5.84 2.285 -2.35					.162***											.205
Section Color Co	7 C	CA	San Bernardino	12			046	.048	.053	.048	2.085	.437	959	.041	.664	.341
50 CA San Bernardino 9001 .156 .061 .902 .074 .005 .009 .06 .244 .1261 .1.27 .018 .216 .015 .016 .016 .016 .016 .016 .016 .016 .016		JA.			.331						5.684					.022
51 C.A. San Diego 1 0.04	9 C	. A		2002	.173		206***							040		.002 .225
52 CA San Diego 1 1028 -072 -23*** 032 0.05 0.78 87 -1.316 -2.941 388 193 54 CA San Diego 3 0.63** 0.87** .031 0.02 0.8 1.389 0.33 .2873 .17 .974 55 CA San Diego 6 -0.14 -0.65 -0.77 .031 .061 .076 .466 -1.099 -9.17 .677 .29 56 CA San Diego 10.01 -0.22 -0.37 -2.31*** .026 .054 .065 .923 .601 .3294 .414 .492 57 CA San Diego 10.00 .073*** .026 .13*** .026 .054 .025 .93 .601 .3294 .414 .492 60 CA San Diego 10.00 .073*** .063 .083 .025 .93 .141 .192 .914 .141														.018		.225 421
53 CA San Diego 3 0.63** 0.87** -1.38** 0.025 0.09 0.96 2.533 2.206 2.482 0.14 0.31 55 CA San Diego 5 0.18 0.02 -31*** 0.31 0.61 0.76 -4.46 -1.09 -9.17 .65 2.7 2.31*** 0.05 0.14 0.76 -4.46 -1.09 -9.17 .65 2.7 2.0 56 CA San Diego 1002 0.22* 0.37 -2.3*** 0.05 0.47 0.48 .807 -56 2.4 .414 .402 57 CA San Diego 1007 -9.7*** .036 .23*** .026 .037 .213** .42 .12 .12 .21 .43** .42 .12 .43** .43** .05 .05 .03 .03 .03 .03 .03 .03 .03 .03 .03 .03 .03 .03 .03 .0				1										388		005
54 CA San Diego 6 .014 .065 .477 .031 .062 .08 1.389 .033 .2-873 .17 .974 .055 .A8 Diego 6 .014 .065 .477 .031 .061 .076 .466 .1.069 .917 .657 .29 .056 .A8 Diego 101 .022 .037 .213*** .026 .054 .065 .477 .048 .065 .223 .661 .2.294 .414 .402 .056 .477 .048 .056 .477 .048 .056 .477 .048 .056 .477 .048 .056 .477 .048 .057 .056 .478 .056 .478 .056 .478 .056 .057 .058 .058 .058 .058 .058 .058 .058 .058	3 C	CA	San Diego	3	.063**	.087**	138**	.025	.039		2.533	2.206	-2.482	.014	.031	.016
56 CA San Diego 1001 -022 -0.37 -2.13*** .026 .954 .965 .823 601 -2.294 .414 .492 58 CA San Diego 1002 .023 .036 .13*** .026 .917 .048 .877 .54 .211 .203 .151 .151 .151 .151 .151 .151 .151 .151 .151 .151 .151 .151 .153 .153 .154 .127 .203 .154 .151 .153 .154 .151 .203 .154 .151 .203 .154 .151 .203 .154 .151 .203 .154 .151 .154	4 C	2A	San Diego		.048	.002	231***	.034	.062		1.389	.033	-2.873		.974	.006
57 CA San Diego 1002 0.23	5 C	JA.			014	065	07		.061	.076	446	-1.069		.657	.29	.363
58 CA San Diego 1006 Off*** .051 -1.22* .023 .037 .063 .3.142 1.302 .1-91 .003 .169 60 CA San Diego 1077 .07** .066 -1.03 .033 .062 .079 .9.92 .1-54 .211 .325 10 CA San Josephin 1002 .010 .0.63 .088 .08 .026 .78 .98 62 CA San Liad Oblego .001 .046** .0.44** .022 .0.64 .0.65 .1.08 .0.14** 65 CA San Liad Oblego .001 .0.4*** .0.22 .02 .0.24** .0.22** .0.24** .0							213***									.002
59 CA San Diego 100707**066103			San Diego		071***		- 122*									.057
60 CA San Fancisco 5 .653017 .053079 .092211 .325				1007	07**	096		.033	.062	.067	-2.103	-1.548	-1.533	.04	.127	.13
62 CA San Luis Obispo 2001 046**	0 C	CA		5	.053		017	.053		.079	.992			.325		.833
63 CA San Lisio Oblogo 2002 (888*	1 C	2A						.038			.026					.439
64 CA San Luis Oblego 3001 038																.283
65 CA San Jairo Obligo 8001 048*** 022 .02 .042 2.367																.286
66 CA San Mateo 1001 01415 0.06 1.07 2.98 -1.402 7.767 CA Santa Barbarna 8 -0.0	5 C	CA	San Luis Obispo	8001	.048**		022	.02		.042	2.367		524	.021		.602
68 CA Santa Barbara 10 00 024	6 C	CA	San Mateo		.014		15	.046		.107	.298		-1.402	.767		.166
CA Santa Barbara 1013 -023 -023 -025 -0.08 -0.95 -0.08 -0.95 -0.08 -0.95 -0.08 -0.							046									.32
70 CA Santa Barbars 1014 -004 -03 03 .064 -1.25 .465 .901 71 CA Santa Barbars 1018 .055 . .059 .02 .053 .1246 .1 .218 .766 .748 .768 .748 . .768 .748 . .766 .748 . . .766 .748 . . .766 .748 .																.015 .671
71 CA Santa Barbara 1018 .025 .059 .02 .053 .1.246 .1.1 .218 72 CA Santa Barbara 1021 007 .033 .023 .044 323 766 .748 73 CA Santa Barbara 1025 .078 .02 .057 2.306 .1416 .025 74 CA Santa Barbara .001 .07 .033 .047 203 .2912 .84 75 CA Santa Barbara .001 .07 .036 .07 .034 .083 .84 .805 .375 76 CA Santa Chara .03 .067 .034 .083 .84 .805 .375 77 CA Santa Chara .011 .053 .062 .082 .3024 .42 .001 79 CA Santa Chara .001 .073* .010 .055 .017 .444 .223 .658 <td></td> <td>644</td>																644
72 CA Santa Barbara 1021 .007																.276
73 CA Santa Barbara 1025 047** 0.8 0.2 0.57 2.306 - 1.416 0.25 74 CA Santa Barbara 2001 0.05 1.38*** 0.23 0.47 0.203 0.47 0.203 0.29 2 .84 75 CA Santa Barbara 3001 017 0.66 0.19 0.46 .876 1.309 3.84 76 CA Santa Barbara 3001 017 0.38 0.67 0.34 0.83 0.83 0.83 0.84 77 CA Santa Barbara 1001 0.73* 0.06 0.05 0.05 0.82 0.82 0.82 0.82 0.82 0.82 0.82 0.82	2 C	CA	Santa Barbara	1021	007		033	.023		.044	323		766	.748		.447
75 CA Santa Barbara 3001 0.17 0.6 0.19 06 .876 1.309 .384 76 CA Santa Barbara 4030 . 0.3 . 0.67 .0.34 .083 .884 .805 .375 77 CA Santa Clara 101 .057* . 0.14 .082 .3024 . 42 .001 79 CA Santa Clara 101 .073* . 0.17 .0.41 .08 1.779 .217 .08 81 CA Sharta 3.035 .086 . 0.14 .081 .379 . 1.057 .70 81 CA Solumo 3 .056 . 0.05 .031 .051 .988 .03 .088 .108 . 2.24 .33	3 C	CA	Santa Barbara				08				2.306					.162
76 CA Santa Barbara 4003 .03 .067 .034 .083 .894 .895 .375 7 CA Santa Clara 4 .158** .034 .052 .082 3.024 .42 .004 75 CA Santa Clara 1011 .073* .011 .01 .015 .017 .414 .221 .088 76 CA Shata Cruz 3 .011 .01 .05 .017 .414 .223 .058 . <td></td> <td>.005</td>																.005
77 CA Santa Clara 158***																.196 .424
78 CA Santa Cruz 1001 073* . 0,11 . 0,11 . . 1,79 .<																.424
70 CA Santa Cruz 3 011 . 01 025 047 444 223 658 CA Shasta 3003 08																.829
80 CA Shasta 3003 008	9 C	CA		3	.011		.01	.025		.047	.444		.223	.658		.824
82 CA Snooma 3 .054 . .088 .033 .058 .1,604 .1,525 .114 .14 <th< td=""><td>0 C</td><td>CA</td><td>Shasta</td><td></td><td>.008</td><td></td><td>046</td><td></td><td></td><td>.044</td><td></td><td></td><td></td><td></td><td></td><td>.295</td></th<>	0 C	CA	Shasta		.008		046			.044						.295
83 CA Stanislaus 5 .062 .101* .038 .057 1.609 1.776 .113 84 CA Tulare 6 .889*** .209*** .006 .037 .061 .455 .03 .3285 .003 85 CA Tulare 2002 .017 .006 .037 .061 .455 .05 .761 .149 .424 86 CA Ventura 4 .063 .048 .043 .047 .063 -1.462 .805 .761 .149 .424 87 CA Ventura 2002 .072 .014 -141** .028 .028 .046 2.082 .482 .301* .02 .631 88 CA Ventura 2002 .072 .012 .354 .053 .049 .086 1.368 .241 -4.16 .176 .811 89 CA Ventura 2003 .067** .05																.006
84 CA Tulare 6 689** . 209** 0.29 0.64 3.08 3.285 0.03 8 8 8 8 8 9 9 9 9 9 9 9 9 9 9 9 9 9 9																.133
85 CA Tulare 2002 017 . 0.06 0.97 . 0.61 .455 . 0.097 .651		7A		6												.002
86 CA Ventura 4 .063 .038 .048 .043 .045 .045 .046 .263 .264 .264 .265 .764 .149 .424 .875 .7 CA Ventura 5 .655** .014 .141*** .028 .028 .046 .268 .248 .240.15 .042 .351 .88 .CA Ventura .2002 .072 .012 .354 .053 .049 .086 .1.368 .241 .4.116 .176 .811 .176 .810 .184 .185 .185 .185 .185 .185 .185 .185 .185	5 C	CA	Tulare	2002	.017		.006	.037		.061	.455			.651		.923
87 CA Ventura 5 .659** -0.014 -1.41*** .0.28 .0.28 .0.06 .2.02 -4.82 -3.045 .0.12 .531 .88 CA Ventura 2002 .0.72 -0.012 -3.54 .0.53 .0.49 .0.86 .1.368 -2.41 -4.116 .1.76 .811 .89 CA Ventura 2003 -6.6** -0.05 -0.06 .0.33 .0.49 .0.73 -2.029 .1.116 -0.77 .0.47 .2.09	6 C	CA			063		048	.043	.047	.063	-1.462	805	764	.149		.448
89 CA Ventura 2003067**05006 .033 .045 .073 -2.029 -1.116077 .047 .269	7 C	CA	Ventura		.059**		141***		.028	.046	2.082	482		.042		.003
																939
50 CA CHILD 9004 -090 -109 -109 1000 1001 A -1-000 -1-000 101 A -1-000 -1-000 101 A -1-000 -1-000 101 A -1-000																.939
Notes. Effects shown are the monitor specific estimated coefficients on the treatment dummics of the	, (03										.921

Notes: Effects shown are the monitor-specific estimated coefficients on the treatment dummies of the regression discontinuity specification (4). Standard errors are clustered on year-season. Estimated effects CARB are relative to the baseline of a 9.0 psi RVP standard. Sample uses data from all seasons of 1989-2003. Stars indicate the following p-values: *** p<0.01, ** p<0.05, * p<0.10.

Table A5—Monitor-Specific Regression Discontinuity Estimates for combined RVP and RFG

Index	State	County	Monitor ID	RD RVPII effect	RD RFG effect	RVPII standard error	RFG standard error	RVPII t-score	RFG t-score	RVPII p-value	RFG p-value
1	AZ	Maricopa	19	168	087*	.04	.045	-4.156	-1.95		.056
2	AZ	Maricopa	1004	081	079**	.05	.033	-1.618	-2.37	.111	.021
3	DC	District of Columbia	25	.123*	.059	.071	.06	1.74	.977	.088	.333
4	MD	Baltimore	3001	.002	055	.045	.042	.036	-1.314	.971	.194
5	MD	Harford	1001	.057*	039	.032	.025	1.802	-1.533	.077	.131
6	TX	Galveston	1002	216***	003	.077	.066	-2.79	049	.007	.961
7	TX	Harris	46	093	003	.057	.044	-1.638	067	.107	.947
8	TX	Harris	47	041	.016	.055	.042	739	.377	.463	.708
9	TX	Harris	62	109*	.022	.056	.051	-1.933	.433	.058	.666
10	TX	Harris	1035	032	.02	.061	.048	53	.418	.598	.678
11	TX	Tarrant	1002	.048	.208	.041	.032	1.184	6.483	.242	
12	TX	Tarrant	2003	079	.1***	.05	.034	-1.572	2.943	.122	.005
13	VA	Fairfax	1004	.063	016	.057	.053	1.107	308	.273	.76
14	VA	Fairfax	5001	018	.007	.06	.052	306	.129	.761	.898

 \overline{Notes} : Effects shown are the monitor-specific estimated coefficients on the treatment dummies of the regression discontinuity specification (4). Standard errors are clustered on year-season Estimated effects of RVP phase II (less than or equal to 7.8 psi) and federal RFG are relative to the baseline of a 9.0 psi RVP standard. Sample uses data from all seasons of 1989-2003.

Stars indicate the following p-values: *** p<0.01, ** p<0.05, * p<0.10.