

July 20, 2009

Mr. Tyler Fox  
Air Quality Modeling Group, OAQPS  
U.S. Environmental Protection Agency  
Mail Drop C439-01  
Research Triangle Park, NC 20460

**Re: Request for OAQPS Action on the Use of the 1-Minute ASOS Data**

Dear Mr. Fox:

The Northeast States for Coordinated Air Use Management (NESCAUM) would like to take this opportunity to bring to your attention an important issue identified by our Permit Modeling Committee. It concerns the use of the Automated Surface Observing System (ASOS) meteorological data in air permit related modeling.

Based on the work of the AERMOD Implementation Workgroup's (AIWG) ASOS and Meteorological Data Subgroup, a number of limitations have been identified with the "standard" database reported by the National Weather Service (NWS). To alleviate most of the issues with the accuracy and completeness of these standard meteorological data sets, the Subgroup has obtained 1-minute wind speed and wind direction ASOS data from various NWS sites and performed model sensitivity analyses. These analyses indicate that the use of 1-minute data results in an improvement of the databases for use in air quality modeling.

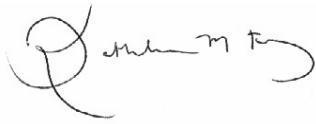
In light of these results, we urge EPA to take the following actions in order to facilitate the use of the 1-minute ASOS data in regulatory applications:

- 1) Your staff has developed a computer program that generates hourly meteorological data using the 1-minute ASOS data. The program and its user's guide need to be finalized.
- 2) In conjunction with release of the above user's guide, a clarification memo should be issued which addresses policy implications related to the use of the 1-minute ASOS data.

We appreciate your staff's efforts on various important aspects related to the AERMOD modeling system and would like to urge that the completion of the above tasks be assigned a high priority.

If you or your staff have questions about our concern, please contact Alan Dresser, Chairman of the NESCAUM Permit Modeling Committee, at 609-633-2675 (New Jersey Department of Environmental Protection).

Sincerely,

A handwritten signature in black ink, appearing to read "Kathleen M. Fahey". The signature is fluid and cursive, with a large initial "K" and a long horizontal stroke extending to the right.

Kathleen M. Fahey  
Environmental Analyst

cc: Roger Brode, EPA OAQPS  
James Thurman, EPA OAQPS  
NESCAUM Permit Modeling Committee Members  
NESCAUM Directors