

May 31, 1996

EPA-SAB-CASAC-LTR-96-007

Honorable Carol M. Browner
Administrator
U.S. Environmental Protection Agency
401 M. Street S.W.
Washington, DC 20460

RE: CASAC Comments on Air Quality Modeling for the Section 812
Retrospective Study

Dear Ms. Browner:

At their December 22, 1992 meeting, the Science Advisory Board's Advisory Council on Clean Air Compliance Analysis (ACCACA, formally known as the Clean Air Act Compliance Analysis Council, CAACAC) decided to refer review of the air quality modeling part of the Retrospective Study of the impacts of the Clean Air Act to the Clean Air Scientific Advisory Committee (CASAC). The request was made to CASAC in a March 22, 1993 memo from Mr. Jim DeMocker of the Office of Policy Analysis and Review (OPAR) in EPA's Office of Air and Radiation. Subsequently, a Panel of CASAC members (the Air Quality Models Subcommittee, AQMS) and SAB consultants was constituted to review the air quality modeling.

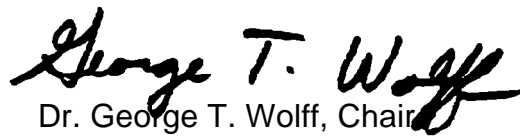
Three public conference calls on October 1, 21, and December 2, 1993 served to brief the panel members on the charge and air quality methodology and for Panel members to comment on the methodology. The panel members provided EPA with numerous comments during the conference calls and subsequently in writing. These comments were summarized for you in a June 30, 1994 letter report (EPA-SAB-CASAC-LTR-94-009). A major concern at the time was that the uncertainties in the air quality estimates in the "no-Clean Air Act" scenarios would be intolerable.

The six member panel conducted a final public conference call on April 26, 1996 to review the completed air quality modeling. During the call and subsequently in writing, the panel members provided comments to the Agency. All the panel members expressed their satisfaction that the Agency followed the Panel's recommendations and

that the final product is sound. Our concern over the uncertainties has diminished considerably, but nevertheless, it still exists. We have provided your staff with a number of recommendations to explicitly articulate the uncertainties, to not overstate the precision of the estimates, and to more carefully present the implications of the uncertainties for the overall study results.

With the incorporation of these relatively minor changes, the Panel feels that air quality estimates are reasonable and are appropriate to use to estimate the benefits of the Clean Air Act. Please let me know if we can assist you any further.

Sincerely,

A handwritten signature in black ink that reads "George T. Wolff". The signature is written in a cursive style with a large, sweeping "G" and "W".

Dr. George T. Wolff, Chair
Clean Air Scientific Advisory Committee

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