

1           **Preliminary Comments on the REA Planning Document from Dr. Donna Kenski**

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4           **Analytical approach and study area selection:**

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6           The overall approach seems sound and Chapter 4 starts out with a fairly clear description  
7           of the process, but loses some of that clarity in the sections on adjustments to ambient  
8           data, as noted below. I liked the choices of study areas, although it may be my Midwest  
9           bias. The criteria for selecting them were clear and rational. Terrain wasn't mentioned  
10          as a possible complicating factor; should it be?

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12          **Ambient air concentrations:**

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14          1. Use of AERMOD: AERMOD seems like the only reasonable choice, and the ISA did a  
15          good job documenting its strengths and some remaining weaknesses.  
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17          2. Use of SO<sub>2</sub> measurements from ambient monitors: The processes described in Section  
18          4.1.3 on adjustments to the ambient data, then to the modeled data, were quite confusing.  
19          A diagram might help readers keep the various steps straight. I understand how the 5-  
20          minute ambient data estimation process works but not why it is being done this way.  
21          Some additional explanation is needed. For example, why are two different methods  
22          being used to fill in the missing data? Despite the stated goal of maintaining the features  
23          and bounds of the existing monitoring data, the 2 equations used to estimate 5-minute  
24          averages don't seem to yield realistic-looking data. If the goal is just to fill in with values  
25          that add up to the 1-hour average, then why not apply the same method to each of the  
26          concentration categories? What advantages are conferred by using multiple methods?  
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28          3. Proportional approach to adjusting data to just meet the standard: This method is  
29          straightforward and worked well for the last review. I see no reason to change unless  
30          issues arise once the actual analyses are underway.

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32          p.4-13, line 9: transpose is the wrong word. Perhaps you meant transfer or translate?

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34          p. 4-16, last line: delete either  
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