

04-17-18 Preliminary Draft Comments from Clean Air Scientific Advisory Committee (CASAC) Sulfur Oxides Panel. These preliminary pre-meeting comments are from individual members of the Panel and do not represent CASAC consensus comments nor EPA policy. Do not cite or quote.

**Preliminary Comments from Dr. James Boylan on the  
03-29-18 Draft CASAC Review of the EPA’s *Policy Assessment for the Review of the Primary  
National Ambient Air Quality Standard for Sulfur Oxides*  
(*External Review Draft - August 2017*)**

On page 6 of the Consensus Responses to Charge Questions, lines 18-22:

“Currently the AERMOD model is used to estimate exposures. There are several uncertainties associated with the use of this model, including its tendency to smooth concentration variations over space, uncertainties associated with the use of meteorological observations from sites different from those where asthmatics are exposed, as well as the inability of AERMOD to consider sub-hourly changes in wind speed and direction.”

I recommend lines 18-22 be supplemented (add one sentence to end of the paragraph) to read:

“Currently the AERMOD model is used to estimate exposures. There are several uncertainties associated with the use of this model, including its tendency to smooth concentration variations over space, uncertainties associated with the use of meteorological observations from sites different from those where asthmatics are exposed, as well as the inability of AERMOD to consider sub-hourly changes in wind speed and direction. Time-of-day, day-of-week (weekday/weekend), and season-of-year model biases should be accounted for in the final PA.”