



AERMOD COMMENTS

Air & Waste Management Assoc.
AB-3 Committee

General Comments

- General impressions of AERMOD are favorable
- Model evaluation record is impressive
- There are some implementation, documentation and guidance issues that need to be dealt with quite soon
- The existence of these issues should not be used as a basis to delay promulgation

General Comments (2)

- There is a need for AERMAP to accommodate 10m DEM files

Implementation Issues

- Provide the intended schedule for promulgation of AERMOD
- Clarify the grandfathering of ISCST3
 - How long will EPA support ISCST3?
 - Are there any situations where ISCST3 can continue to be used after AERMOD becomes the EPA model of choice without a demonstration?

Implementation Issues (2)

- Provide adequate funding for a “point of contact” where questions can be answered reasonably quickly and accurately
- Provide adequate funding for timely maintenance and corresponding documentation of the AERMOD code

Guidance Issues

- Provide sufficient guidance to assure *reasonable* consistency in the applications of AERMOD
- Provide guidance on the use of Bulk-Richardson Scheme (RDT) for use of on-site data in remote areas without cloud cover data
- Standardize and provide guidance on the use of PVMRM method

Guidance Issues (2)

Improve guidance on using land use parameters:

- Guidance on defining “seasons” (see MPRM Manual Table 3-4)
- Should multiple land use sectors be used, and, if so, when?

Guidance Issues (3)

- Complete and release AERSCREEN, the screening tool for AERMOD
- Will AERSCREEN be designated as a “screening model” in Appendix W?
- Provide adequate guidance on how and when to use AERSCREEN

Documentation Issues

- It is unclear from the AERMET documentation whether the land use sectors are for the upwind direction or downwind direction
- AERMET documentation fails to indicate which onsite met. variables are active and which are simply “placeholders”
 - Addition of an appendix to the User’s Guide could accomplish this

Summary

- We encourage the prompt release of AERMOD
- Work and funding is needed in the areas of:
 - Implementation
 - Guidance
 - Documentation