



February 3, 2022

Dr. James Thurman, Air Quality Modeling Group
Dr. Chris Misenis, Air Quality Modeling Group
Office of Air Quality Planning & Standards (OAQPS)
U.S. Environmental Protection Agency (EPA)
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Subject: AERMET/MMIF Comment Period Extension

Dear Dr. Thurman and Dr. Misenis:

The members of the Association of Air Pollution Control Agencies (AAPCA)¹ appreciate the opportunity from U.S. EPA OAQPS to comment on the draft versions of the AERMET preprocessor (v21DRF) and Mesoscale Model Interface (MMIF, version 4.0).² This letter is to request a 45-day extension of the comment period, from February 7 to March 24, in order to allow adequate time for state and local air agencies to perform the complex analyses that are necessary for providing substantive input on these draft versions.

Because AERMET is U.S. EPA's preferred regulatory meteorological pre-processor for the American Meteorological Society/Environmental Protection Agency Regulatory Model (AERMOD), sufficient feedback from state and local air agencies that review and test AERMET (v21DRF) and MMIF (v4.0Draft) will provide important insight to U.S. EPA as the Agency develops a final version for regulatory use.

AAPCA's request to extend the comment period comes in light of the current comment period spanning multiple federal holidays as well as the ongoing challenges associated with the COVID-19 pandemic. Agencies, understandably, are testing these drafts alongside current modeling needs that support air quality planning and permitting. Providing at least 45 more days for evaluation and comment will give state and local air agencies opportunity to fully review these significant changes.

¹ AAPCA is a national, non-profit, consensus-driven organization focused on assisting state and local air quality agencies and personnel with implementation and technical issues associated with the federal Clean Air Act. Created in 2012, AAPCA represents 48 state and local air pollution control agencies, and senior officials from 21 state environmental agencies currently sit on the AAPCA Board of Directors. AAPCA is housed in Lexington, Kentucky as an affiliate of [The Council of State Governments](https://www.councilofstategovernments.org/). You can find more information about AAPCA at: www.cleanairact.org.

² Memorandum from James Thurman, "[Release of Draft AERMET, Version 21DRE](#)," December 6, 2021.



Thank you for your consideration of this comment period extension request. If you have any questions, please contact Mr. Jason Sloan, AAPCA's Executive Director, at (859) 244-8043 or jsloan@csg.org.

Sincerely,

Jason Sloan
Executive Director, AAPCA

CC: Chet Wayland, Director, Air Quality Assessment Division, U.S. EPA OAQPS
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