

April 13, 2001

Mr. J. David Mobley  
Acting Director, EMAD  
U. S. Environmental Protection Agency, MD-14  
Research Triangle Park, North Carolina 27711

Dear Mr. Mobley:

On behalf of the State and Territorial Air Pollution Program Administrators (STAPPA) and the Association of Local Air Pollution Control Officials (ALAPCO), thank you for the opportunity to comment on the U.S. Environmental Protection Agency's (EPA's) proposed changes to the Air Quality System/Aerometric Information Retrieval System (AIRS) database. Our comments are based on the proposed changes as they are outlined in your draft response to Don Porteous of EPA Region I. Our understanding is that EPA's proposal will re-engineer the AIRS database to limit the on-line availability of detailed AIRS data. Specifically, EPA proposes to limit on-line accessibility to the most recent ten years worth of measurements with older, more detailed data available only on CD-ROM by request. According to EPA, this re-engineering is necessitated by the rising cost of on-line data storage.

While we appreciate EPA sharing its rationale for limiting on-line availability of AIRS data, we are not convinced that this will result in substantial cost savings for EPA. The cost of data storage has been rapidly and steadily decreasing over the last few years, and it appears likely that this trend will continue. Furthermore, the cost of making the data available on-line must be weighed against the costs that EPA would incur responding to requests for the older data and delivering it on CD-ROM. Moreover, we believe there are other, more cost-effective options for providing the data. For example, the U.S. National Climatic Data Center ingests 55 gigabytes per day of meteorological data, processes and stores it, and makes most of it available on-line to users for a nominal fee. We believe this is one option for providing data that EPA should consider.

Moreover, we are very concerned that such limited access to data will negatively affect state and local air agency activities. Therefore, we believe that EPA should continue to make available on-line all the detailed, historical data, rather than limiting it to the most recent ten years. We offer the following reasons in support of our position.

First and foremost, in order for state and local agencies to make sensible and statistically valid conclusions about trends in ambient concentrations of air pollutants, more than ten years worth of data is usually needed. If these analyses are performed with only ten years of data, there is a significant risk that year-to-year variations in meteorological conditions will tend to mask the true trends in the data. This in turn is likely to lead analysts to draw erroneous conclusions regarding the

effectiveness of control programs, and would inhibit our ability to properly target pollution control measures.

Second, historic AIRS data serves multiple, equally important purposes. One example is multi-state regional ozone modeling analysis – work that is usually performed by regional groups (e.g., state or other stakeholder groups). In particular, when modeling multi-day, large-scale historic ozone and other meteorological studies, the availability of hourly data, as opposed to summary data, is essential. In addition, when multiple agencies and organizations are involved, using one central repository like AIRS is much more efficient than waiting to receive CD-ROM files from EPA, or independently contacting multiple agencies for the information.

Finally, we are concerned that EPA’s proposal would make older, more detailed data available only on CD-ROM by request. Specifically, we are concerned that requests for information may not be fulfilled in a timely manner, and that once provided, the data may not be in the same format as the existing AIRS data. We believe that such added difficulty in obtaining the long-term data would lead researchers to “make do” with the limited data available online.

In light of our concerns, we believe it would be very helpful if EPA could provide cost analysis information to us so that we can better understand EPA’s underlying cost issues. We believe that a more complete understanding of the basis for EPA’s cost concerns will allow state and local agencies to offer meaningful recommendations that can meet both EPA’s and state and local needs. In the mean time, we believe EPA must continue to provide all historic data on-line.

We hope these comments are helpful, and appreciate the opportunity to provide them. If you have any questions, please contact either of us, or Geri O’Sullivan of STAPPA/ALAPCO.

Sincerely,

Nancy L. Seidman  
STAPPA Chair  
Monitoring Committee

Mel Zeldin  
ALAPCO Chair  
Monitoring Committee

Cc: Bill Harnett (EPA OAQPS) Catherine Brown (EPA Region IX)  
Don Porteous (EPA Region I) Rich Scheffe (EPA OAQPS)

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