

STAPPA / ALAPCO

STATE AND TERRITORIAL  
AIR POLLUTION PROGRAM  
ADMINISTRATORS

ASSOCIATION OF  
LOCAL AIR POLLUTION  
CONTROL OFFICIALS

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EXECUTIVE DIRECTOR

**Testimony of  
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Supervisor  
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Dayton, Ohio  
on behalf of the  
State and Territorial Air Pollution Program Administrators  
and the  
Association of Local Air Pollution Control Officials  
on the U.S. Environmental Protection Agency's Proposed Rule  
on National Ambient Air Quality Standards for Particulate Matter  
(January 17, 2006, 71 *Federal Register* 2620)  
Docket ID No. EPA-HQ-OAR-2001-0017**

**March 8, 2006**

Good morning. My name is John Paul and I am the Supervisor of the Regional Air Pollution Control Agency in Dayton, Ohio. I am also the President of ALAPCO. I appear today on behalf of STAPPA and ALAPCO, the national associations representing state and local air pollution control agencies throughout the country. We have three major concerns with EPA's proposal—the levels of the PM<sub>2.5</sub> standards, source and population exemptions associated with the coarse particle standard and the lack of funding for monitoring.

First, we find it very troubling that EPA's revisions to the annual and daily PM<sub>2.5</sub> standards are outside the ranges recommended by CASAC—a Congressionally-chartered group of outside scientific experts.

While CASAC recommended tightening the annual PM<sub>2.5</sub> standard in conjunction with lowering the daily standard, EPA totally ignored this recommendation. With respect

to the annual standard, the agency proposed no changes at all, even though CASAC told EPA it “did not endorse the option of keeping the annual standard at its present level.” Even EPA’s own staff paper indicates that more deaths from fine PM are avoided by lowering the annual average standard than by lowering the daily standard.<sup>1</sup> With respect to the daily standard, while CASAC recommended a range of limits, it made the upper end of the range conditional on tightening the annual standard. Regrettably, EPA has chosen the upper limit of CASAC’s recommended daily standard without the important condition of tightening the annual standard. Unless EPA strengthens its proposal consistent with the recommendations of CASAC, our associations are extremely concerned we will continue to see significant increased premature mortality and adverse health effects throughout the country.

Our second concern with EPA’s proposal relates to the coarse PM standard. While we support the adoption of such a standard, we believe EPA’s proposal is seriously flawed in two major respects.

We are deeply troubled that the proposal exempts from control major sources contributing significantly to coarse PM emissions, including agricultural, mining and other sources of crustal material. Excluding these sources implies their emissions are not harmful, yet EPA does not present any such evidence. On the contrary, it is likely that coarse particles from agriculture and mining activities pose risks similar to urban coarse PM. These exemptions also pose insurmountable implementation problems for state and local agencies. For example, are mining and agricultural activities that occur in or near urban areas to be exempted from controls, even if they are the dominant source of coarse PM emissions in the area?

We are also extremely concerned that EPA’s proposed coarse PM standard has the practical effect of ignoring the health and welfare of millions of people throughout the country living in areas with populations less than 100,000. Exempting these areas from

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<sup>1</sup> EPA, “Review of the National Ambient Air Quality Standards for Particulate Matter: Policy Assessment of Scientific and Technical Information,” (December 2005), EPA-452/R-05-005a. See in particular, Table 4-17 and Appendix 4B.

monitoring their air quality is an unprecedented action and completely ignores the recommendation of CASAC. Moreover, we do not believe the Clean Air Act makes any provision for selective protection of public health. Accordingly, we urge EPA to rescind these exemptions from coarse PM.

Finally, while it is critical that EPA establish NAAQS that are fully protective of public health and welfare, it is also vitally important that we have adequate monitoring networks that allow the public to know their air is safe to breathe. Unfortunately, EPA's proposal and FY2007 budget request ignore the important funding issues associated with deploying and operating monitoring networks for both PM<sub>2.5</sub> and coarse PM.

With respect to PM<sub>2.5</sub>, EPA has made no provision to increase federal funding to address the expanded monitoring requirements for the new standard. In fact, the President's proposed budget for FY2007 slashes fine particulate monitoring by \$17 million, which will severely weaken existing monitoring programs and likely result in significant staff cuts throughout the country. Agencies will have serious difficulties rehiring personnel who have been laid off as a result of these budget cuts and who would have been expected to operate these monitoring networks. We urge that the proposed FY2007 budget cuts be restored, and that EPA provide funding in FY2008 to expand the PM<sub>2.5</sub> monitoring program.

We are also troubled that EPA has ignored any commitment to funding the proposed coarse PM network scheduled for deployment in FY2008. EPA has estimated that the capital costs of this monitoring network could easily exceed \$14 million, with annual operating expenses of approximately \$13 million. State and local agencies will simply not be able to assume these significant costs. We urge EPA to provide new funding in FY2008 for the coarse PM monitoring network.

In conclusion, we strongly recommend that EPA 1) follow CASAC's recommendations in setting the PM<sub>2.5</sub> air quality standards, 2) establish a coarse particle

standard without exemptions, 3) require PM monitors in rural areas and 4) commit to providing additional, not reprogrammed, funds for PM<sub>2.5</sub> and coarse PM monitoring.

Thank you for the opportunity to testify. I would be happy to answer any questions.