

EPA's Response to STAPPA and ALAPCO's Recommendations on Strengthening the Agency's Support for Air Pollution Training

January 24, 1997

Ms. Mary Boyer
Compliance Training Officer
California Air Resources Board
Post Office Box 2815
Sacramento, California 95812

Dear Ms. Boyer:

This letter is in response to your October 15 and November 5, 1996 letters to me in which you offered several recommendations to strengthen the Environmental Protection Agency's (EPA) leadership as a training provider. I appreciated the opportunity to meet with you in Incline Village, NV to discuss this issue further. This letter serves as the next step in addressing your recommendations and as a response to your letters to Steve Herman of the Office of Enforcement and Compliance Assurance (OECA). In developing this response, we worked with OECA's Air Enforcement Division and the National Enforcement Training Institute (NETI).

Also, thank you for the final report on the STAPPA/ALAPCO Joint Training Committee's training needs assessment survey which you submitted with your November 20, 1996 memorandum. I recognize the effort that was put into the survey and your intention that it serves as a cornerstone for identifying and delivering air pollution control training. I am proud that the Office of Air and Radiation (OAR) served as a partner in this endeavor and that the Office of Air Quality Planning and Standards (OAQPS) is an active participant on the training committee along with our colleagues in OECA.

As you know, some years ago, OAR was instrumental in establishing a multi-office training task force to address strategic and long-term training issues; however, this task force has been dormant during the past year. I believe that this would be a good time to resurrect it to address the strategic issues raised in your letters. I have asked John Seitz, Director, OAQPS, to take the lead in reconstituting the task force and to schedule a first meeting. We will also ask the OECA offices to serve on it.

As a member of the task force, OECA will bring much to the table. It is justifiably proud of NETI's newly opened state-of-the-art training facility in Washington, D.C. Although OECA does little in the way of rulemaking, it has incorporated training into recent rules such as those for Field Citations and Citizen Awards. In continuing with this theme, OECA is proposing to incorporate a preliminary FY 1998/99 training course plan into the draft Memorandum of Agreement (MOA) Guidance to be issued this January.

I believe that we should consider the eventual broadening of this multi-office training task force to include our non-governmental customers; however, I feel that this should be a longer-term goal. As a first step, we should assemble the appropriate representatives from within our partnership, then add private sector members as the task force deems fit.

I further support your view that training is, indeed, the cornerstone of any successful air program, and we at the EPA have to be much more attentive to building training into the regulatory development process. I believe this would be an excellent issue for the multi-office training task force to address. I am buoyed by some of OAR's recent successes in sharing information on several future rulemaking activities with the regulators and the regulated community. The Industrial Combustion Coordinated Rulemaking (ICCR) and the Ozone and Particulate Matter (PM) National Ambient Air Quality Standards (NAAQS) review workgroups have both made use of the Air Pollution Distance Learning Network (APDLN) as a means to inform a broad spectrum of people about upcoming activities at the start of the regulatory development process. These efforts are certainly steps in the direction that your letters suggested.

Concerning your recommendation that EPA play a major role in developing and updating high priority courses and course materials, we are committed to continuing to play this role as both an active participant on the training committee and as an individual air training provider. I also recognize and support the training committee's efforts in this regard, especially its current work in integrating the diverse course information from the major air training providers, (e.g., Air Pollution Training Institute (APTI), California Air Resources Board (CARB), and NETI), with the training needs of individual State and local agencies.

As you are aware, the APTI is a recognized leader among air pollution training providers and has played a major role in providing training materials to other providers for many years. Many technical air pollution training courses that are offered by other providers frequently use APTI courses as the foundation for their own. However, APTI, which is now part of the Education and Outreach Group, has faced the challenge of maintaining its traditional classroom curricula in the face of a burgeoning emphasis on satellite delivery and the lack of an effective training-related contractual instrument under which to develop new and update existing course offerings. This situation has recently improved with the award of a major new course development training procurement. This will enable important APTI courses to be updated and new course needs to be addressed.

As you know, the APDLN has been used with great success, particularly for emerging topics related to policies, guidance, and other issues that tend to have a short shelf life. This delivery mechanism has proven to be a cost-effective tool for both the student as well as the EPA, saving valuable travel dollars and time out of the office. I clearly recognize the national significance of this delivery mechanism and have committed significant resources for its continued support.

However, I understand the need to offer several types of course delivery. For instance, we continue to fund area and specialized training centers that conduct classroom courses on subjects ranging from air pollution control laboratory applications to enforcement and

compliance field demonstrations. The EPA also funds Regional Consortia that sponsor both geographically specific courses and help with the needs assessment survey, and of course, OAR continues to fund a good bit of the CARB compliance program. A final point with the new course development procurement I mentioned above, and with new activities at NETI, we will be able to focus more attention on self-instructional and desktop computer-based training courses as future training delivery tools.

I clearly recognize and will continue to support training as a key component of a successful air program. The OAR, with our partners in OECA, looks forward to continuing our relationship with the other dedicated members of the STAPPA/ALAPCO training committee.

I appreciate this opportunity to be of service and trust that this information will be helpful to you.

Sincerely,

Mary D. Nichols
Assistant Administrator
for Air and Radiation

cc: Bill Becker, STAPPA/ALAPCO
STAPPA/ALAPCO Committee Chairs
Daniel Shea, ALAPCO
Earl DeVaney, OECA
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