

November 15, 1996

Carol M. Browner
Administrator
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, DC 20460

Dear Administrator Browner:

We understand that EPA's Office of Research and Development (ORD) has decided to stop funding and conducting support activities and other applied science research, which has been critical to state and local air quality programs. On behalf of the State and Territorial Air Pollution Program Administrators (STAPPA) and the Association of Local Air Pollution Control Officials (ALAPCO), we wish to express our concern over EPA's failure to clarify if, and how, the agency plans to fulfill its long-standing commitment to undertake and fund applied research activities critical to state and local air agencies' policy and regulatory development.

Over the past 25 years, state and local air pollution control agencies, working in partnership with EPA, have established a national system of air monitoring networks that has achieved the highest levels of operational reliability, data capture and data quality. The availability of comprehensive, high quality air monitoring data is absolutely necessary for making sound air quality decisions, for determining sources' compliance with applicable emission limits and for documenting the significant air quality improvements achieved under the national air program. The availability of high quality air monitoring data will be even more critical as EPA considers adopting new National Ambient Air Quality Standards for fine particles and ozone.

Generating and collecting high quality data, however, is dependent on national quality assurance programs and technical resources, such as those developed under EPA's applied science programs and set out in the attachment accompanying this letter. These programs and technical resources are critical to the success of the national air program because they provide state and local air agencies with the tools necessary to ensure the generation of high quality air monitoring data. For example, the National Filter Procurement Program has proven essential for ensuring national uniformity in the filters used and the integrity of state and local air agencies' particulate monitoring programs. Another example is the Standard Reference Photometer Program, which ensures the accuracy of our ozone pollution monitoring network. State and local agencies annually rely on information generated from this program to ensure that their monitoring technologies are accurately calibrated and maintained. It is clear that national air quality assurance programs are needed to ensure that national ambient air pollution standards are met and the public's health is protected.

Recently, STAPPA and ALAPCO have become aware of incremental disinvestments by ORD in some quality assurance programs, including the National Filter Procurement Program and the Standard Reference Photometer program, described above. While these responsibilities apparently have been reassigned to OAQPS, there is no evidence that funding adequate to support these responsibilities has been shifted to OAQPS. The associations recommend that EPA transfer funding to OAQPS in support of these newly reassigned responsibilities, and take steps to ensure that adequate funding is transferred to the appropriate program offices that are assigned applied science responsibilities in the future.

STAPPA and ALAPCO believe that *any* diminishment in EPA's commitment to, or financial support for, the applied science needed for effective regulatory development jeopardizes the credibility and effectiveness of federal, state and local environmental regulatory programs and renders our environmental decisions vulnerable to unnecessary challenge and delay.

The associations are not opposed to EPA transferring applied science functions from ORD to other program offices, since these responsibilities, in many cases, were previously fulfilled outside of ORD. The associations, however, believe that if the agency transfers the responsibility for conducting applied science activities away from ORD to program offices, EPA also must transfer commensurate funding to the program offices in support of these critical responsibilities. Absent adequate funding, EPA will not be fulfilling its obligation to safeguard the integrity of our air pollution control programs and the public's health.

In order to clarify EPA's position on this important issue, STAPPA and ALAPCO request that EPA provide the associations with a detailed accounting of the applied science activities from which ORD intends to disinvest and the agency's plan for reassigning and funding these tasks.

The associations are committed to continuing to work with EPA to maintain national environmental programs of integrity. Please contact either of us if you have questions or desire additional information.

Sincerely,

Joseph Williams
President
STAPPA

Bruce Andersen
President
ALAPCO

cc: Mary Nichols, Assistant Administrator-OAR
Bob Huggett, Assistant Administrator-ORD
bcc: John Seitz, Director, Office of Air Quality Planning and Standards
Bill Hunt, OAQPS Emissions, Monitoring & Analysis Division Director

ATTACHMENT

Recommended List of National Quality Assurance Programs to be Continued and Funded by EPA

1. Federal Reference Method and Equivalent Methods Program
2. Quality Assurance Program for Stationary Source Compliance Audit Program
3. Quality Assurance Program for the New Source Performance Standards (NSPS) Test Methods
4. Quality Assurance Program for Toxic Air Emission Test Methods
5. Quality Assurance Program for Photochemical Assessment Monitoring Stations (PAMS)
6. *Quality Assurance Handbook* and related guidance documents
7. Precision and Accuracy (P&A) Program
8. National Performance Audit Program (NPAP)
9. National Filter Procurement Program
10. Standard Reference Photometer Program
11. Protocol Gas Certification Program