

September 4, 1997

John Seitz  
Director  
Office of Air Quality Planning  
and Standards  
U.S. Environmental Protection Agency  
MD-10  
Research Triangle Park, NC 27711

Dear Mr. Seitz:

We are writing on behalf of STAPPA and ALAPCO to reiterate recommendations the Training Committee submitted to former Assistant Administrator Mary Nichols in a letter dated October 15, 1996. Those recommendations delineated actions EPA should take to strengthen the agency's role as a training provider for air pollution control officials in state and local agencies. Among the recommendations was a call to build training into the regulatory development process. By ensuring that each new rule is accompanied by an appropriate and timely training program for state and local air agency staff, EPA will promote effective resource utilization and facilitate implementation of new regulations with less disruption to state and local air programs. To underscore EPA's commitment to this approach, STAPPA and ALAPCO specifically recommended including reference to an EPA-developed training program in each Federal Register notice that announces a new rule.

Despite Ms. Nichols' positive response to the associations' recommendations (please reference Ms. Nichols' letter dated January 24, 1997), EPA has not supported inclusion of training program descriptors in rules and formal policy documents. The STAPPA/ALAPCO/EPA Joint Training Committee (JTC) attempted to integrate a brief and modest training reference in the Preamble to the PM monitoring rule of July 1997. After working with OAQPS staff to craft a succinct statement alluding to training opportunities, we were extremely disappointed by deletion of the language from the final rule on the grounds that training is not a suitable subject for a Preamble. As the JTC has expressed in the past, it is imperative to have strong training programs and strategies in place when rules are published to promote successful implementation.

To this end, STAPPA and ALAPCO urge EPA to include language in the Preamble to the upcoming Interim Implementation Policy that refers to the training programs currently being developed for PM<sub>fine</sub> monitoring. Significant progress is being made to develop training for PM<sub>fine</sub> monitoring and state and local air agencies should be apprised of these efforts in the *Federal Register*. The agency should use this occasion to establish a model for all future EPA rules.

We hope that you will take this opportunity to reemphasize EPA's leadership role in the technical training area and assume greater responsibility for training state and local air

program staff. If you have any questions, please feel free to contact us.

Sincerely,

Mary Boyer (CA)  
STAPPA Chair  
Training Committee

Daniel Shea  
(Huntsville, AL)  
ALAPCO Chair  
Training Committee