

Mary Nichols  
Assistant Administrator  
Office of Air and Radiation  
U.S. Environmental Protection Agency  
401 M Street, S.W.  
Washington, D.C., 20460

Dear Ms. Nichols:

We are writing on behalf of STAPPA and ALAPCO to recommend actions EPA should take to strengthen the agency's training program for air pollution control officials in state and local agencies. Recognizing that training is the cornerstone of any successful air program, STAPPA and ALAPCO, through its Training Committee, have been working with EPA to assess important training needs to meet emerging air pollution problems. Recently, EPA, STAPPA and ALAPCO completed a survey of over 70 state and local agencies and have reached the following conclusions and recommendations.

STAPPA and ALAPCO strongly believe that EPA should reemphasize its leadership role in the technical training area, and assume greater responsibility for training state and local air program staff. Over the years, air pollution control activities have evolved into a more diverse and technically complex field. EPA's Office of Air and Radiation and Office of Enforcement and Compliance Assurance have recognized the agency's responsibility for training under the Clean Air Act as well as the importance of training in program implementation. However, while EPA has provided support for the Air Pollution Training Institute (APTI), the National Enforcement Training Institute (NETI), and other training programs for state and local air pollution control personnel, there is still a need for EPA to provide additional training. State and local agencies are taking the initiative in developing training for their own staff, but EPA has a major role to play in at least two areas.

First, EPA should build training into the regulatory development process, so that resources and schedules allow each new rule to be accompanied by an appropriate training program for the state and local agency staff who will ultimately be responsible for implementing and enforcing the rule. As regulations are developed by EPA, implementation and enforcement of these regulations are increasingly delegated to state and local agencies. It is essential that state and local air personnel receive training on the new rules as they are promulgated. If this training is not provided, experience has demonstrated that state and local staff will be less knowledgeable about the regulations than the regulated community. This will undermine the program, the regulation, and the credibility of the state and local air agencies. Just as the agency has become increasingly concerned with the issue of providing enhanced public access and "fair notice" to industry on new or changing regulations, so too should EPA be concerned with providing information and training to state and local agencies.

We offer two specific suggestions for implementing this recommendation:

- ?? Incorporate a training strategy into the rule-making process; training should occur concurrently with the development of a final rule.
- ?? Include a reference to this EPA-developed training program in each Federal Register notice that announces a new rule.

Second, EPA should play a major role in the development and updating of high priority courses and course materials so that they can be made available to other providers of training. EPA is in a unique position to serve as a resource for all providers of air pollution training. The agency's APTI, a leader among training providers since its inception, could play a major role in providing training materials to other providers. The numerous other training providers, such as NETI, state agencies, universities, and regional consortia, who have developed specific areas of expertise could benefit from the coordination, development and sharing of core materials. Specific suggestions to implement this recommendation include:

- ?? APTI and NETI should update existing courses as needed and make these revised materials available to other providers.
- ?? EPA should develop or support development of new courses on emerging topics that are cited as high priority by state and local agencies, and make these courses and course materials available to other providers, preferably in electronic formats.
- ?? EPA should emphasize documentation of training programs, through instructor manuals and participant materials, to facilitate replication or adaptation of these courses to state and local agency needs.

Finally, to make the preceding recommendations possible, EPA should include long-term funding for training in its strategic plans. In this new era of environmental protection, with new approaches and policies emphasizing economic incentives, market based approaches and customer service excellence, the need for training is magnified. Over the years, these programs have demonstrated that the return on investment in training is high.

We are enclosing a copy of the final report on the training needs assessment survey, as well as a fact sheet with relevant statistics and findings from the survey that support the recommendations made in this letter. Once again, we would like to reiterate the associations' commitment to work with EPA in reemphasizing its leadership role in the technical training area and assuming 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

Robert Fulp (Winston-Salem, NC)

ALAPCO Chair

Training Committee

