

January 12, 2004

S. WILLIAM BECKER
EXECUTIVE DIRECTOR

U.S. Environmental Protection Agency
EPA Docket Center
Docket No. OECA-2003-0154
Mailcode 2201T
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

To Whom It May Concern:

The State and Territorial Air Pollution Program Administrators (STAPPA) and the Association of Local Air Pollution Control Officials (ALAPCO), whose members include state and local air pollution control agencies across the nation, wish to provide the following comments and recommendations on the U.S. Environmental Protection Agency's (EPA's) Preliminary National Enforcement and Compliance Assurance Priorities for Fiscal Years 2005, 2006, and 2007 as set forth in the *Federal Register* on December 10, 2003 (68 FR 68893).

STAPPA and ALAPCO strongly support the following priorities, as identified by EPA:

1. Clean Air Act/New Source Review/Prevention of Significant Deterioration (NSR/PSD). We agree that failure to comply with NSR/PSD requirements may lead to the inadequate control of emissions, resulting in the release of thousands of tons of pollution to the air each year, particularly of nitrogen oxides, volatile organic compounds, and particulate matter. Therefore, we support vigorous enforcement of NSR/PSD requirements.
2. Clean Air Act/Air Toxics. The agencies support the priority of reducing public exposure to toxic air emissions by ensuring compliance through directed monitoring and enforcement with the Maximum Achievable Control Technology standards.
3. In addition, STAPPA and ALAPCO urge EPA to address concentrated animal feeding operations (CAFOs) comprehensively by taking into

account air emissions as well as water discharges. The associations encourage EPA to insure that CAFOs comply with the Clean Air Act.

4. STAPPA and ALAPCO support the priority of improving and better maintaining federal facility compliance.
5. STAPPA and ALAPCO further support the goal of proper management of the Clean Air Act enforcement and compliance programs by ensuring that instances and patterns of significant noncompliance are identified and addressed by EPA and/or States in a timely manner.
6. The associations support the reduction of public exposure to hazardous wastes and pollutants released to the air by the miscellaneous plastic products manufacturing sector.
7. Finally, STAPPA and ALAPCO support the priority of ensuring compliance with the Clean Air Act and other statutes by addressing the storage, distribution and ancillary operations at liquid petroleum and natural gas handling facilities.

In conclusion, the associations appreciate the opportunity to comment on the proposed priorities and look forward to continued participation in the prioritization process. If STAPPA and ALAPCO can be of any assistance in this important process or are needed to clarify or expand on these comments, please do not hesitate to contact one of us or Mary Stewart Douglas of STAPPA and ALAPCO at (202) 624-7864.



Felicia Robinson
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