

**Testimony of the
State and Territorial Air Pollution Program Administrators
and the
Association of Local Air Pollution Control Officials
before the
Senate Appropriations Subcommittee on VA, HUD, and Independent Agencies
regarding the
FY 2004 Budget of the U.S. Environmental Protection Agency
April 24, 2003**

The State and Territorial Air Pollution Program Administrators (STAPPA) and the Association of Local Air Pollution Control Officials (ALAPCO) appreciate this opportunity to provide testimony regarding the FY 2004 proposed budget for the U.S. Environmental Protection Agency (EPA), particularly regarding grants to state and local air pollution control agencies under Sections 103 and 105 of the Clean Air Act.

STAPPA and ALAPCO are the national associations of air quality officials in 54 states and territories and more than 165 metropolitan areas across the country. The Clean Air Act gives state and local air quality officials the primary responsibility for implementing our country's clean air program on behalf of our citizens. These agencies must work to limit or prevent emissions of a host of pollutants from a variety of sources that have impacts on public health. These include particulate matter, ground-level ozone, toxic air pollution, and acid rain, among others. State and local air agencies must maintain the fundamental elements of their programs – the foundation of our clean air efforts – while, at the same time, addressing new and emerging problems.

Recommendation

The President's FY 2004 budget request calls for \$228.5 million for state and local air agency grants under Sections 103 and 105 of the Clean Air Act, which is \$5 million more than Congress appropriated for FY 2003. While we appreciate this modest increase, the total is not sufficient to support our vital air quality efforts. Furthermore, the increase is earmarked for a specific purpose – air toxics monitoring – so it is not available to fund many of the different and varied programs that state and local air agencies must undertake. While we agree that monitoring toxic air pollution is very important, there are many other activities that are in great need of additional funding as well. The fact of the matter is that state and local air agencies are currently underfunded in general and are in need of substantial increases for numerous activities.

We are very aware that there are tremendous budgetary pressures facing Congress, mostly due to the increased need for homeland security and expenses related to events in Iraq. As a result, many programs cannot be funded as robustly as needed. However, in light of the fact that air pollution poses a considerable threat to the public health of our country, we believe it should be considered one of our highest priorities. We recommend, then, that federal grants to state and local air quality agencies be increased by \$25 million above the President's request, which is only a small share of the amount that is actually needed.

The Need for Increases is Great

It is well established that air pollution presents a pervasive national threat to public health and the environment. The health risks are not only significant, we know of no other environmental problem presenting *greater* risk. Air quality regulators at all levels of government have worked diligently for many years in pursuit of our clean air goals. In spite of the considerable improvements that we have achieved, clean, healthful air nationwide still eludes us.

The magnitude of our air quality problem and the associated health effects, which will be discussed below, make it clear that funding for the control of air pollution should be a top priority. Unfortunately, the reality is that state and local air agencies are underfunded. Although states and localities devote significant resources to their air quality programs, air agencies have been operating for years with inadequate financial support from the federal government. As a result, many of our programs are not as robust as they need to be.

A few years ago, STAPPA and ALAPCO, in cooperation with EPA, conducted a study of air program funding and estimated that federal grants to state and local air pollution control agencies under Section 105 of the Clean Air Act fell short of our needs by nearly \$100 million a year. While we have received modest funding increases in recent years, and additional grants are proposed for FY 2004, these are simply not enough, especially in light of our expanded responsibilities. Unless our programs receive a substantially greater boost in funding, we will continue to face a serious financial shortfall, which will adversely affect our ability to protect and improve air quality. This shortfall will only become worse as greater demands are placed on our programs. Among the air program priorities for which state and local agencies require additional funding are hazardous air pollutants (HAPs); fine particulate matter, especially diesel particulate; compliance; inspections; monitoring; data improvements, including maintaining and improving infrastructures, emission inventories and modeling; haze and visibility monitoring; and outreach to and education of the public and regulated community.

To address the problem of inadequate funds we have identified, we recommend that federal grants to state and local air pollution control agencies be increased in FY 2004. While we believe an increase of \$100 million would help our programs tremendously, we recognize that there are many other competing programs also in need of additional funding, especially this year. Therefore, we are requesting an increase of a quarter of that amount – \$25 million.

The Magnitude of the Air Pollution Problem

Air pollution is a persistent, nationwide problem. Over 170 million tons of pollution are emitted into the air each year across the United States. One hundred and thirty-three million people live in areas of the country that violate at least one of the six health-based National Ambient Air Quality Standards (NAAQS), not to mention the many millions of people who are exposed to toxic air pollutants that cause cancer and other health problems. As noted, the health risks from air pollution are significant and far exceed those from almost every other environmental medium. State and local agencies must address a range of serious air quality problems, a few of which are briefly described below.

Perhaps the most complex air quality problem we face is achievement and maintenance of the NAAQS for particulate matter and ozone. In 1997, EPA established a new standard for fine particulate matter (PM_{2.5}). Although we are still working to complete the data-gathering efforts necessary to determine which areas of the country violate the PM_{2.5} standard, one thing is very clear: PM_{2.5} poses the greatest health risk of any air pollutant, resulting in as many as 30,000 premature deaths each year. Additionally, fine particles are responsible for a variety of adverse health impacts, including aggravation of existing respiratory and cardiovascular disease, damage to lung tissue, impaired breathing and respiratory symptoms, irregular heart beat, heart attacks and lung cancer.

Fine particles are not only emitted into the atmosphere directly from combustion processes, they are also formed secondarily in the atmosphere from such precursor emissions as oxides of nitrogen (NO_x), sulfur dioxide and ammonia; in addition to their adverse health consequences, fine particles also contribute to regional haze. Based on preliminary air quality monitoring data, it appears that PM_{2.5} concentrations in over 170 counties throughout the U.S. exceed the health-based standard.

Overall, progress in attaining clean air has been slowest with respect to ground-level ozone. Some parts of the country actually experienced increased levels of ozone in the past 10 years, and in 33 national parks, ozone levels have risen by more than 4 percent. A significant factor in this trend is the increase we have experienced in NO_x emissions, which are not only a precursor to ozone, but also a contributor to such public health and welfare threats as acid rain, eutrophication of water bodies, regional haze and, as mentioned, secondary PM_{2.5}. Over the past 20 years, NO_x emissions have increased by almost 9 percent, largely due to emissions from nonroad engines and diesel vehicles. Current data show that almost 300 counties measure exceedances of the eight-hour ozone standard.

The serious public health threat posed nationwide by emissions of hazardous air pollutants (HAPs) is another continuing concern we have. Last year EPA released the most recent results of its National-Scale Air Toxics Assessment (NATA), which provides nationwide estimates of exposure and health risks associated with 32 HAPs. While the NATA information reflects the situation of several years ago, it still provides the best indication we have of the magnitude of the problem. According to EPA, more than 200 million people in the U.S. live in areas where the lifetime cancer risk from exposure to HAPs exceeds 1 in 100,000. Moreover, approximately 3 million face a lifetime cancer risk of 1 in 10,000. Considering that EPA has

established 1 in 1,000,000 as the generally acceptable level of risk, these estimates not only illustrate the pervasive nature of the threat posed by HAPs, they also speak to the level of effort that will be required to reduce the risk and the high level of priority that should be placed on doing so.

One HAP of special concern is mercury. Some portion of the mercury that is found in fish is the result of air emissions of that contaminant. The deposition of air emissions in our water bodies, and ultimately into our fish, is a significant problem, especially for those who rely on fish as an important part of their diets. Because of public health concerns, many states have had to issue advisories to the public about elevated concentrations of mercury in the fish that is caught in their water bodies. In fact, by 2001, 44 states had issued advisories, with 17 of them applying statewide. An additional nine states issued advisories for their coastal waters.

The effect of air pollution on the nation's population is very troubling. This concern is only sharpened when we consider the adverse impact of air contaminants on one of our most sensitive and precious populations – our nation's children. Because they are still developing and spend more hours exercising outdoors, air quality has a greater impact on them. EPA recently published a study entitled, *America's Children and the Environment* (February 2003), which contains extremely disturbing data related to air pollution and children. For example, the report concludes the following:

- in 2001, approximately 15 percent of children lived in counties in which the one-hour ozone standard was exceeded on at least one day per year;
- in 2001, nearly 40 percent of children lived in counties that exceeded the eight-hour ozone standard;
- in 2001, approximately 25 percent of children lived in counties that exceeded the PM_{2.5} particulate matter standard;
- in 1996, *all* children lived in counties in which the combined estimated concentrations of hazardous air pollutants exceeded the 1-in-100,000 cancer risk benchmark; approximately 95 percent lived in counties in which at least one HAP exceeded the benchmark for health effects other than cancer;
- in 1999-2000, about 8 percent of women of child-bearing age had at least 5.8 parts per billion of mercury in their blood (children born to women with blood concentrations above that number are at some increased risk of adverse health effects); and
- between 1980 and 1995, the percentage of children with asthma doubled, to 7.5 percent, and by 2001, 8.7 percent of all children had asthma.

The magnitude of the air quality problem and the associated health effects make it clear that significantly increased funding for the control of air pollution should be a top priority.

Expenditure of Additional Funds

STAPPA and ALAPCO recently collected information from their members to learn about funding priorities for state and local air pollution control programs. The report we compiled presents valuable information about the highest priorities of state and local agencies and how

they would spend additional federal grant funds. We provided you this report when it was completed and would be happy to supply you with an additional copy if you wish.

Among the general activities that state and local air agencies identified as their highest priorities, and those on which they would spend increased grant funds, are efforts addressing hazardous air pollutants; compliance, fine particulate matter, especially diesel particulates; inspections; monitoring; improvements in data, including maintaining and improving infrastructures, emission inventories and modeling; haze and visibility monitoring; and outreach and education for the public and regulated community. Depending on what the high-priority issues in their areas are, state and local agencies identified a range of specific activities to which they would target a grant increase. These included the following, among others:

- improve emission inventories of toxic air pollution;
- increase the frequency of inspections of major and minor sources;
- meet the various federal and public expectations under Section 112 (air toxics);
- expand criteria pollutant monitoring;
- improve risk assessment capacity;
- reduce concentrations of fine particulates;
- increase public outreach efforts;
- improve small business compliance assistance;
- purchase replacements for equipment that has outgrown its expected usage;
- increase the number of air toxics monitoring locations to better characterize baseline concentrations and localized impacts; and
- improve modeling tools to determine emission reductions needed.

State and local air agencies' need for increased grants is very great; there are many critical activities that are currently underfunded. Many of these activities are the foundation of our air quality program and are, therefore, essential. Without additional federal grants, and the flexibility to target them to the activities that are most appropriate in individual states and communities, state and local air agencies will find it increasingly difficult to obtain and maintain healthful air quality.

EPA's Budget

Finally, notwithstanding the essential contributions of state and local air agencies to air quality, the federal government's job is critical as well. We need a strong and effective EPA to carry out its responsibilities if we are to achieve and maintain healthful air quality. Therefore, we recommend that Congress provide adequate funding for EPA so that the agency can continue its efforts related to particulate matter; mobile sources; national emission standards, including toxic air pollutant standards; training; health research and risk estimates; and modeling.

Conclusion

We must always keep in mind that the most valuable asset our nation can ever have is a healthy population and a clean environment. In working to achieve our clean air goals, protecting these assets must be our highest priority. Accordingly, we strongly recommend and

urgently request that Congress increase federal grants to state and local air quality agencies under Sections 103 and 105 of the Clean Air Act by \$25 million in FY 2004.

Thank you very much for this opportunity to provide you with our testimony. Please contact us if you have questions or require any additional information.