



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Air Quality Planning and Standards
Research Triangle Park, North Carolina 27711

MAY 27 2004

Mr. Herbert Williams, STAPPA Chair
Mr. Roger C. Westman, ALAPCO Chair
STAPPA/ALAPCO
444 North Capitol St. N.W.
Washington, D.C. 20001

Dear Messrs. Williams and Westman:

Thank you for your interest in EPA's plans for revamping the Emissions Factors (EF) Program. The purpose of this letter is to update STAPPA/ALAPCO of our most recent decisions to improve the existing EP Program, outline the Agency's latest activities, and address the list of critical needs letter dated April 21, 2004.

The demand for emissions factors has grown over the past thirty years, primarily due to expanded use, which includes Title V permitting, PSD/NSR permitting, residual risk determinations, modeling, and regional emissions inventories. Concurrently, Agency expenditures on EF development have decreased while most industry expenditures have exponentially increased over time. In the past, EPA's EF development role primarily consisted of collecting paper copies of source test data, assessing the data quality, and publishing the average of the useable data as an emissions factor in AP-42. Our current involvement in the EF development process is less engaging, resulting in the inability to satisfy the exponentially increasing demand for emissions factors.

Given the current state of the EF Program, the Agency believes this is an opportune time to create a more self-sustaining EF development process, which we are confident will be beneficial for all of our stakeholders. This process will rely on the existing programs that are conducted by industry, State and local agencies, and various offices within EPA. A few components of our plan to revamp the process consist of providing automation standards, additional tools, and an educational component which will allow a quantum leap in our capabilities for the future, without an increased demand in current resources. Additionally, the newly developed standards and tools will result in benefits for program areas other than the emissions factors development process and emissions inventories. Examples of these benefits are better emissions monitoring protocols to support Title V, permit programs, and SIP development, and specialized programs such as emissions trading.

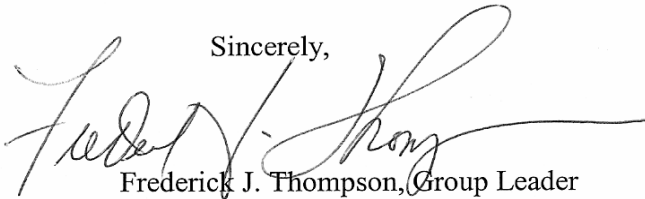
As these automation standards and additional tools are implemented, the Agency will appropriately transition into a role that focuses on the quality of information developed, champion new and improved processes, promote actions to obtain more appropriate emissions information, and encourage partnerships among all of our stakeholders.

As the chairs of STAPPA and ALAPCO, your cooperation and participation is vital to the success of the revamped EF Program. As such, we solicit your help to mutually collaborate in the following areas, and other relative areas you may suggest:

- Creation of electronic formats for data submission and review;
- Serve as Beta test sites;
- Make source test and monitoring information readily accessible;
- Increase oversight, with U.S. EPA, of source test programs;
- Given your knowledge of affected entities, promote site-based source testing for emissions factors development; and,
- Take the lead on an annual EF development meeting.

Using the process outlined above, the Agency would like to collaborate with STAPPA/ALAPCO and affected entities to address EF development for the list of categories you cited in your much appreciated letter to EPA, such as wood-burning, fugitive dust, ammonia from cement plants, and HAPs from pesticide manufacturing. If you have any questions, please contact Peter Westlin, of my staff, at 919-541-1058. We look forward to working with you in the future.

Sincerely,



Frederick J. Thompson, Group Leader
Emissions Factors and Policy Applications Group

cc: Bill Lamason, EMAD
Phil Lorang, EFIG
Peter Tsirigotis, EMAD