

STAPPA / ALAPCO

STATE AND TERRITORIAL
AIR POLLUTION PROGRAM
ADMINISTRATORS

ASSOCIATION OF
LOCAL AIR POLLUTION
CONTROL OFFICIALS

April 21, 2004

S. WILLIAM BECKER
EXECUTIVE DIRECTOR

Peter Westlin
U.S. Environmental Protection Agency
Office of Air Quality Planning and Standards
D243-02, USEPA Mailroom
Research Triangle Park, North Carolina 27711

Dear Mr. Westlin:

The STAPPA and ALAPCO Emissions & Modeling Committee would like to thank you for keeping us informed as you develop the program, "Emissions Factors and Quantification to Support Particulate Matter Reduction." Following our February Committee conference call in which you updated the Committee on the progress of this project, the Committee requested a short summary of the nature and purpose of this program in order to better understand it. We appreciate the summary that you provided, which was discussed in the March conference call. Nonetheless, the Committee continues to have questions about the project. In fact, the summary statement raised more questions than it answered.

First, it is not clear whether EPA itself will or will not actually be developing emissions factors. The summary, for example, states, "assess available technical data and provide emissions factors of known data quality." The emphasis here seems to be on utilizing data that is already available rather than generating new data, although who will accomplish this is not stated. Similarly, the second statement, "respond to stakeholder needs and provide practical technical guidance on a range of emissions quantification techniques" is unclear regarding what will be done and who will do it. Please clarify. The Committee would also like to know if EPA presently plans, either by itself or with the assistance of contractors, to develop emissions factors as a part of this or any other project.

Similarly, the Committee would appreciate EPA clarification of other statements in the summary. For example, EPA stated, "we are undertaking efforts to communicate and identify potential collaborations with stakeholders to reassess and develop plans for advancing the PM...emissions factors development and documentation program." The Committee is interested specifically in what kinds of collaborations are being formed and what plans for advancing PM emissions factors are being developed? Furthermore, the goal of "clarifying and expanding options for federal, state, local and tribal permitting authorities and industry users on the appropriate use of emissions factors ..." appears laudable, but it is simply not clear what options are envisioned, what is being clarified, and who is intended to benefit.

Second, the point was made in the Committee discussion that grants are sometimes available to state and local agencies to undertake testing activities that will enable them to develop emissions factors. For example, South Carolina has received a "Stargrant" for this purpose. The Committee would appreciate your assistance in identifying and conveying relevant information about any grants that are available for state and local agencies for this purpose, especially those that do not require matching funds. Such grants, if available, could be used to supplement—not supplant—EPA's development of emissions factors.

Third, the Committee supports the improvement of data delivery systems, such as that for stack testing data. What are needed are better tools to collect, track, evaluate, and supply the data to the user. Please explain how this project will assist in that need.

Fourth, the Committee is in the process of compiling a list of critical needs for emissions factors that should be developed expeditiously. These categories have been identified so far: 1) wood-burning; 2) fugitive dust; 3) ammonia emissions from cement plants; 4) HAPs from pesticide manufacturing. We will be identifying further critical needs and forwarding them to you.

The briefing given by EPA in the March Committee call raised two additional concerns. The nature of the project was described by EPA as an effort to streamline emissions factors development by enabling stakeholders to form collaborations with EPA and to "use the emissions factor development work itself." When asked which stakeholders had come forward to collaborate on such streamlining, the stakeholders named by EPA were the National Environmental Development Association-Clean Air Regulatory Project (NEDA/CARP), Daimler Chrysler, the printing industry and "some utilities." Although it is clearly important for EPA to take industry views into account, the Committee is concerned that the needs of industry may influence this project disproportionately. Please identify the other stakeholder categories who are engaged closely with EPA's emissions factors work? Furthermore, although the Committee supports the goal of streamlining emissions factors development, the quality and reliability of the data should in no way be compromised by such an effort.

The state and local agencies administer the Clean Air Act and compile emissions inventories--the backbone of the SIP process. To date, it has been unclear how and whether the project may benefit development of accurate emissions inventories. If STAPPA and ALAPCO's views and needs are to be taken into account in a meaningful way, its Emissions & Modeling Committee must be more specifically informed by EPA about the purpose, nature, and intent of this project. The Committee emphasizes that it remains committed to assisting you and communicating with you through meetings and conference calls as you proceed, as we have done to date. We look forward to working with you further and to your responses to this letter.

Sincerely yours,



Roger C. Westman
ALAPCO Chair



Herb Williams
STAPPA Chair