

October 2, 2003

Jeff Holmstead
Assistant Administrator
Office of Air and Radiation
Environmental Protection Agency
Room 5426
Ariel Rios Building
Washington, D.C. 20460

Re: Distribution of Section 103 Air Toxics Monitoring Funds

Dear Mr. Holmstead:

On behalf of the State and Territorial Air Pollution Program Administrators (STAPPA) and the Association of Local Air Pollution Control Officials (ALAPCO), we wish to express serious concerns with EPA's allocation of \$10 million in FY2004 funding under Section 103 of the Clean Air Act for air toxics monitoring efforts, and, in particular, \$6.2 million for community-based monitoring. At the outset, we wish to make it clear that the associations are fully committed to air toxics monitoring efforts that will result in defensible data and, ultimately, installation of appropriate pollution controls. However, EPA's planned expenditures raise several issues of fundamental importance:

- The decision to expend \$6.2 million for community-based monitoring was arrived at unilaterally and did not factor in the recommendations of state and local agencies. As we have discussed in the past, because these are funds appropriated by Congress for state and local air agencies, it is essential that our associations be an integral part of the decision-making process on how these funds are spent. Additionally, as the directors of air programs throughout the country, it is appropriate that those who have day-to-day, front line experience with operating air programs offer their expertise and avert wasteful expenditures.
- Because the decision-making process was one-sided in this case, the resulting decision is flawed. Community-based monitoring should not be forced on all state and local agencies as the only possible use for this money. A "one-size-fits-all" approach ill suits the needs of the many diverse areas of the country.

- Assuming that community-based monitoring may, in fact, be a valuable choice for some agencies, EPA must, at the outset, be able to define its data objectives for these grants, and, additionally, articulate its expectations for using the monitoring information. To date, despite our efforts, we have received no responses to our information requests of this nature. Expenditures will be unlikely to result in cohesive and defensible products unless their purpose is defined clearly at the outset.
- Finally, STAPPA and ALAPCO believe that the \$10 million includes certain amounts that have been designated incorrectly. First, it was stated in the President's FY 2004 budget request that tribal allocations are separate from state and local allocations. The breakdown announced in February 2003 indicated that the categorical grant program for air totaled \$247.8 million, including: \$228.6 million for "State and Local Assistance, \$11 million for "Tribal Assistance" and \$8.2 million for "Radon." It is our understanding that the \$10 million in air toxics monitoring grants was a component of the \$228.6 million amount, hence earmarked for state and local assistance. Additionally, EPA's FY 2004 allocation spreadsheet, showing a total of \$228.6 million for state and local air agencies, includes a footnote stating "Notes: Tribal and SIRG funds are not shown." To commingle these amounts now would be unfair and would set a bad precedent for the clarity and dependability of the budget process. Moreover, quality assurance and data analysis tasks are rightfully EPA's responsibility. The \$730,000 currently earmarked for these purposes should instead be available for state and local programs.

As an alternative to EPA's proposed allocations, STAPPA and ALAPCO believe that EPA should distribute air toxics monitoring funding through the EPA Regional offices to the state and local air agencies. Such a process would allow each Region to work in collaboration with state and local agencies and take into account its own unique industrial, demographic and geophysical characteristics. We feel this process is far superior to the national competitive grant procedure.

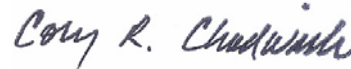
On a related subject, STAPPA and ALAPCO are also concerned that none of the \$10 million earmarked for air toxics monitoring is available under Section 105, and urge that you reconsider your decision.

In sum, we urge a cooperative process that includes the state and local agencies from the outset, that defines its goals appropriately, that includes the EPA regions, and that will ultimately yield meaningful data. Please do not hesitate to contact either of us if you have any questions.

Sincerely,



Lloyd Eagan
STAPPA President



Cory Chadwick
ALAPCO President