

STAPPA / ALAPCO

STATE AND TERRITORIAL
AIR POLLUTION PROGRAM
ADMINISTRATORS

ASSOCIATION OF
LOCAL AIR POLLUTION
CONTROL OFFICIALS

September 27, 2004

S. WILLIAM BECKER
EXECUTIVE DIRECTOR

Steve Page, Director
U.S. Environmental Protection Agency
Office of Air Quality Planning
& Standards
C404-04, USEPA Mailroom
Research Triangle Park, North Carolina 27711

Re: Distribution of Section 103 Air Toxics Monitoring Funds

Dear Mr. Page:

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 once again our serious concerns with EPA's budget allocation of \$6.2 million in FY2005 grants under Section 103 of the Clean Air Act for local-scale air toxics monitoring. Although we appreciate the efforts that EPA has made to articulate its reasons for this allocation, particularly in the context of its development of the "National Monitoring Strategy, Air Toxics Component," we nonetheless find the reasoning unpersuasive. The associations continue to believe that these expenditures raise several crucial issues.

At the outset, we are very concerned that EPA did not collaborate with state and local air agencies in allocating the \$6.2 million for local-scale monitoring in FY2004 and FY2005. As you acknowledged in your December 10, 2003 letter, EPA did not consult with state and local agencies prior to the decision to allocate these funds "because the \$7 million was a follow-on and because the continued use of Section 103 meant that no matching State funds would be required." However, as the agencies responsible for implementing this program, we should have had an opportunity to influence this decision in the first instance. Because that opportunity did not arise (through the vehicle of the former Air Toxics Steering Committee or any other route), we now urge you to reject the competitive grant process as the means for distributing these funds. Because the appropriations are designated by Congress for use by state and local air agencies, it is imperative that the agencies be meaningfully included in decisions affecting their disposition.

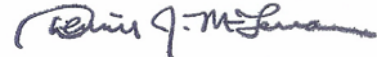
STAPPA and ALAPCO strongly support an air toxics monitoring allocation system wherein EPA distributes funds to the ten EPA regional offices, followed by a meaningful collaboration between the regions and their respective state and local agencies to determine what projects should be funded in each region. We continue to believe that such a distribution process is far superior to a competitive grant process. An EPA region-based process is enhanced by the existing relationships between EPA and the state and local agencies as well as the regional offices' knowledge of air toxics data needs within their jurisdictions.

In conclusion, the enclosure accompanying your December 10 letter stated that the committee "struggled with defining a collective well defined vision for utilizing the added [fiscal] resources." The state and local agencies, however, were not a part of this struggle and continue to question this "vision." Once again, we urge EPA to allocate these air toxics monitoring funds in a way that includes the views of state and local agencies, as well as the EPA regions. Such a process will result in data that is defensible and will, ultimately, be most likely to lead to implementation of strategies designed to protect the public from harmful exposure to air toxics. We look forward to discussing these issues with you.

Sincerely yours,



Jim Joy
STAPPA Co-Chair



Dennis McLerran
ALAPCO Co-Chair