

MEMORANDUM

TO: Peter Tsirigotis

FROM: The State and Local Members of the Monitoring Steering Committee:
George Allen, Jack Broadbent, Jerry Campbell, Mary Stewart Douglas, Dirk Felton, Mike Gilroy, Mike Koerber, Charles Pietarinen, Tom Taminini, Steve Spaw, Dick Valentinetti

RE: National Air Toxics Monitoring—Optimizing Our Resources

At the December 9 meeting of the National Monitoring Steering Committee in Washington, DC, members expressed serious concerns about the current competitive grant approach to monitoring air toxics, as set forth in the “National Monitoring Strategy, Air Toxics Component.” You requested that we take a fresh look at EPA’s existing air toxics monitoring strategy and provide you with our ideas and opinions for revising it. We appreciate this opportunity to revisit this crucial area and are hopeful that our thoughts will assist EPA in making mid-course adjustments to the strategy. We believe the strategy can and should be redesigned to best achieve our mutual goal of obtaining sound and defensible air toxics information that is relevant to air quality policy and strategy needs.

Members of the Steering Committee have discussed with you the nature of our concerns with the competitive grant system and have also urged, in letters to Jeffrey Holmstead (October 2003) and Steve Page (September 2004), that it be changed. Although we will not restate in any detail the content of these letters, we want to reiterate our support for an air toxics monitoring system in which EPA distributes funds to the ten regional offices, followed by a meaningful collaboration between the regions and their respective state and local agencies to determine which projects should be funded in each region. Such a distribution process is enhanced by the existing relationships between the regional offices and the state and local monitoring specialists and is able to accommodate specific air toxics data needs within state and local jurisdictions. We continue to advocate adoption of this system and elimination of the competitive grant system.

We were encouraged by your presentation at the STAPPA/ALAPCO membership meeting in Coeur d’Alene where you agreed to reconsider the competitive approach to allocating air toxics monitoring grants to better focus our efforts on addressing significant air toxics issues, such as filling characterization gaps for key pollutants and areas.

If, however, changing the current system is not possible, we offer another approach that will better meet the needs of the monitoring community and, ultimately, the public. Under this scenario, EPA would publish and communicate a Request for Proposal (RFP) for air toxic monitoring funds. Funding would be available for qualified projects that fit into any one of five pre-approved categories, or bins. The Steering Committee proposes the following bins:

1. **Source Identification.** This BIN would make funding available for the important purpose of identifying air toxic “footprints” from particular sources, such as airports, refineries, or other industry sectors. Examples of successful studies of this nature include “The West Louisville Air Toxics Risk Assessment,” the study of air toxics from the rubber industry in West Louisville, Kentucky; and an ongoing monitoring project in Rhode Island that will characterize toxic pollutants from an airport.
2. **Methods Development.** Funding for this BIN would be for the purpose of developing accurate methods for measuring certain specific pollutants. The Steering Committee noted, in particular, that funding should be earmarked, at the outset, for development of methods to measure chrome 6, formaldehyde, and wood smoke. Innovative methods could be proposed for this BIN.
3. **Data Assessment.** The Steering Committee feels strongly that data gathered without adequate assessment and analysis is data whose usefulness is extremely limited. To that end, one BIN would be for the purpose of assessing and analyzing existing air toxics data, similar to the LADCO-led project that was undertaken by Sonoma Technology. Another example is the assessment of data from the dioxin ambient monitoring program undertaken by EPA/ORD that has not been evaluated to date.
4. **Equipment Evaluation and Comparison.** Funds for this BIN would be used for evaluating the effectiveness and accuracy of innovative equipment, such as comparing different types of differential optical absorption spectroscopy (DOAS) open-path equipment. Although overlapping conceptually with BIN #2, this BIN would focus on evaluation of existing innovative equipment in order to ascertain its practical value, while #2 is intended to develop methods “from scratch” for monitoring pollutants of concern.
5. **Local or Community-Scale Monitoring.** This would continue the concept currently in the grant guidance, although Steering Community members strongly advocate not undertaking such air toxics monitoring unless it is tied to health data—such as the Detroit Health Study—or another specific focus.

If this RFP approach to air toxics monitoring is adopted, the Steering Committee envisions collaborating with EPA to develop the details of these RFP concepts. For example, the question of exactly which sources would be most useful and productive to “fingerprint” would be discussed and decided by the whole EPA/STAPPA/ALAPCO Steering Committee. Similarly, the RFP specifications for the equipment that would be evaluated and compared (BIN 4)

would be arrived at collaboratively by the entire Committee. Such a process would continue to address our original concerns about meaningful involvement in decisions relating to grant allocations under section 103 of the Clean Air Act, and would make good use of the collective expertise represented by the Steering Committee.

In addition, we encourage you to give priority in providing air toxics monitoring funding to state and local agencies that have not received funding in the previous three years. This will enable the funding of a wide range of recipients and meritorious projects.

We anticipate collaborating with you to define more specifically the purpose, scope, and vision of our new Committee. It has been suggested, for instance, that we could broaden our outlook by adding one or two members knowledgeable in different disciplines, such as public health or modeling. We would like to pursue this idea. Furthermore, no matter what approach is taken to air toxics monitoring grants, there will be a need for oversight and evaluation of projects. This task, too, could be undertaken by Committee members.

Finally, we would like to explore ways in which our service on the Steering Committee would not make our agencies ineligible for air toxics monitoring grants. If we are part of the process of evaluating applications for the use of these funds (as we, ideally, anticipate), a recusal requirement for member-applicants could enable members to avoid conflicts of interest, while not penalizing them for their expertise and commitment to development of national monitoring policy.

Again, we very much appreciate your receptiveness to our request for reopening consideration of the matters raised in this memorandum. We look forward to working with you in order that toxic air pollutants can be monitored as productively and accurately as possible. Ultimately, we hope that our efforts will increase understanding of the health effects of toxic air pollution and lead to improved public health and longevity nationwide.