

STAPPA / ALAPCO

STATE AND TERRITORIAL
AIR POLLUTION PROGRAM
ADMINISTRATORS

ASSOCIATION OF
LOCAL AIR POLLUTION
CONTROL OFFICIALS

S. WILLIAM BECKER
EXECUTIVE DIRECTOR

August 20, 2004

Mr. Robert D. Brenner
Principal Deputy Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency
Ariel Rios Building, Room 6103A
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Mr. Brenner:

We are writing on behalf of the State and Territorial Air Pollution Program Administrators (STAPPA) and the Association of Local Air Pollution Control Officials (ALAPCO) to inform you of a decision on training funding made by STAPPA and ALAPCO at the summer 2004 meeting of the associations' Boards of Directors and Committee Chairs. STAPPA and ALAPCO agreed to increase the amount withheld for training from section 105 off-the-top funds in Fiscal Year (FY) 2005 by \$325,000, with one-half of this amount being matched by EPA for FY 2005 training activities, and the other half to be put toward funding training activities in FY 2006. This is explained in more detail below.

As you are aware, STAPPA and ALAPCO maintain that funding for training state and local air officials is an EPA responsibility and should be fully funded by EPA. (This federal responsibility was reiterated in a House Appropriations Committee report that accompanies the FY 2001 appropriations bill, House Report No. 106-674.) However, in order to ensure that state and local air officials receive at least the minimum training necessary to perform their jobs, states and localities have agreed to set aside some of their "off-the-top" section 105 funds in order to fund training. Prior to FY 2001, states and localities agreed to withhold \$3.9 million per year for training. In FY 2001 and 2002, this amount was decreased to \$1.8 million. The Joint Training Committee, in which EPA participates, in 2002 determined that *at least* \$2.125 million per year is needed to fund training. This amount is required to ensure that the regional consortia and area training providers are provided enough funding to operate, and that there is some funding for developing new courses and updating courses. In FY 2003, states and localities agreed to increase the off-the-top section 105 share for training by \$162,500 as long as EPA also provided an additional \$162,500 for training. This agreement was successfully executed. For FY 2004, STAPPA and ALAPCO once again reluctantly agreed to provide an additional \$325,000 in

funding for training in order to maintain the \$2.125 million, though EPA did not agree to contribute any additional funds. With that information, the Joint Training Committee met in March 2004 and allocated training funding based on a total of \$2.125 million being available for training. However, EPA subsequently informed STAPPA and ALAPCO that it was unable to reappropriation FY 2004 section 105 funds to provide additional funds for training because the funds had already been allocated and distributed to the regions. Accordingly, training providers are currently operating with only \$1.8 million in FY 2004.

Given that the associations' decision to increase the allocation of funds for training by \$325,000 was not executed for FY 2004, at the summer 2004 Boards of Directors and Committee Chairs meeting the associations approved an increase in off-the-top funding for training in the amount of \$325,000 using FY 2005 funds. Since EPA had agreed – in discussions between STAPPA/ALAPCO's Executive Director Bill Becker and the Director of EPA's Office of Air Quality Planning and Standards, Steve Page – to provide an additional \$162,500 in FY 2004 funds for training, the associations' Boards and Chairs also approved the following: 1) one-half of the \$325,000 (\$162,500) should be used for FY 2005 training activities (which, combined with EPA's \$162,500, would provide \$2.125 million for FY 2005 training activities); 2) the other half of the \$325,000 (\$162,500) should be used for FY 2006 training activities; and 3) STAPPA and ALAPCO should continue to press EPA to fulfill its responsibility to fully and adequately fund training.

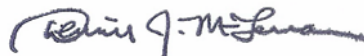
Accordingly, on behalf of STAPPA and ALAPCO, we request that EPA withhold from FY 2005 section 105 funds a total of \$2.125 million in FY 2005 for training. EPA has already withheld \$1.8 million for training; the additional \$325,000 should be withheld on a pro-rata basis, using the same withholding formula as used to obtain the original \$1.8 million.

If you have any questions, please feel free to contact either of us or Bill Becker at 202-624-7864.

Sincerely,



James A. Joy, III
STAPPA President



Dennis J. McLerran
ALAPCO President

cc: Steve Page, Director of the Office of Air Quality Planning and Standards