

October 23, 2019

Mr. Peter Tsirigotis  
Director, Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N. W.  
Washington, DC 20460

Director Tsirigotis:

The Association of Air Pollution Control Agencies (AAPCA)<sup>1</sup> submits this letter in concert with the U.S. Environmental Protection Agency (EPA) Office of Air Quality Planning and Standards' (OAQPS) recent efforts to develop air pollution control training resources and curriculum updates. As coregulators under the federal Clean Air Act (CAA), AAPCA's state and local members are responsible for planning and implementing air quality regulations designed to protect public health. Regularly updated, timely, and high-quality training resources directly support agency work to fulfill CAA obligations, and AAPCA members appreciate renewed work and commitments from U.S. EPA OAQPS.

Under CAA Section 103, U.S. EPA is directed to "conduct and promote coordination and acceleration of training for individuals relating to the causes, effects, extent, prevention, and control of air pollution."<sup>2</sup> In support of this work, AAPCA is transmitting from its membership several principles and priorities to inform U.S. EPA OAQPS' process to evaluate its training structure and develop new curricula.

On May 3, 2019, AAPCA submitted comments<sup>3</sup> on the draft versions of the National Program Guidances for the Offices of Air and Radiation (OAR) and Enforcement and Compliance Assurance (OECA). National Program Guidances "communicate operational planning priorities, strategies, and key activities for advancing the agency's Strategic Plan and guide grant work planning with states, tribes, and territories."<sup>4</sup> The Association's comments supported an emphasis on training assistance and development. Specifically, AAPCA submitted the following comments regarding training opportunities:

- State and local air agencies must not only ensure that staff are provided opportunities for continuing education at advancing levels and kept up-to-date on technical air pollution control developments, but plan for the growing percentage of employees able to retire. U.S. EPA's support and leadership through the funding, development, and support of training and training materials for air agency personnel is critical to air improvement efforts.
- AAPCA members support U.S. EPA OECA in efforts regarding "Other ongoing collaborative efforts with ECOS [that] include: producing webinars to help us identify new compliance approaches that we could then pilot and evaluate; developing smart mobile tools to make our inspectors more efficient and effective; increasing availability of training; preparing for advances in pollution monitoring technology."

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<sup>1</sup> AAPCA is a national, non-profit, consensus-driven organization focused on assisting state and local air quality agencies and personnel with implementation and technical issues associated with the federal Clean Air Act. AAPCA represents more than 40 state and local air agencies, and senior officials from 20 state environmental agencies currently sit on the AAPCA Board of Directors. AAPCA is housed in Lexington, Kentucky as an affiliate of The Council of State Governments (CSG). You can find more information about AAPCA at: [www.cleanairact.org](http://www.cleanairact.org).

<sup>2</sup> [42 USC §7403 \(5\)](#).

<sup>3</sup> <https://www.cleanairact.org/documents/AAPCAComments-EPANationalProgramGuidance-OAR-OECA-FY20-21-FINAL.pdf>.

<sup>4</sup> U.S. EPA, "[Final Overview to the FY 2020-2021 National Program Guidances](#)," June 2019.

- U.S. EPA OECA prioritization of training opportunities and capacity building for air agency personnel is vital to appropriate and fair compliance and enforcement efforts at the state and local levels.

On June 9, 2019, U.S. EPA published the final National Program Guidance for agency offices.<sup>5</sup> AAPCA appreciates that OAR's final guidance indicates that the Agency will "Continue to maintain and enhance the APTI-Learn learning management system to improve the administration and delivery of classroom and web-based training; develop and update courses on a routine basis; Update self-instructional courses in a web-based e-learning format; and, Develop and maintain curricula to facilitate the training of air pollution agency staff on both introductory and more advanced state plan development."<sup>6</sup>

Presenting at AAPCA's 2019 Fall Business Meeting in Raleigh, North Carolina, Anna Marie Wood, Director of the Outreach and Information Division of U.S. EPA OAQPS, outlined several training priorities for U.S. EPA as well as a timeline for implementation through fiscal year 2022.<sup>7</sup> Those priorities included selecting and deploying a new learning management system (LMS); developing a "national cadre of subject matter experts" (SME); evaluating the status of existing course work; and, establishing annual goals for updating individual courses. AAPCA appreciates Director Wood's presentation and applauds the outlined priorities and timeline. The Association also emphasizes the importance of continuing to engage state and local agencies as U.S. EPA OAQPS works to meet these goals.

AAPCA has surveyed its state and local members for training priorities. Based on this member feedback, AAPCA is providing several principles and priorities to inform the goals of U.S. EPA OAQPS, outlined below.

#### Introductory Courses

U.S. EPA OAQPS should prioritize updating training materials and courses that facilitate the onboarding process and are self-instructional for on-demand training. Examples include Air Quality 101 and Permitting 101.

#### Stack Test Training

U.S. EPA should provide regular training opportunities for stack test training, in particular in-the-field training that provides the opportunity for observing tests and reviewing protocols and test reports.

#### Permitting and New Source Review

U.S. EPA should ensure training materials and courses for permitting are relevant and consistently updated, including policies and processes for Title V, New Source Review (NSR), Prevention of Significant Deterioration (PSD), and rule applicability for New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP). For example, based on feedback received, comprehensive NSPS and NESHAP training, overview, and navigation tools would help reduce permit processing time.

#### Monitoring and Air Quality Data

U.S. EPA should provide opportunities for state and local agency staff to receive technical training for monitoring systems and equipment, as well as the processing and quality assurance/quality control (QA/QC) procedures for data. Prioritization should be given to new equipment and/or networks, starting

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<sup>5</sup> <https://www.epa.gov/planandbudget/national-program-guidances>.

<sup>6</sup> <https://www.epa.gov/sites/production/files/2019-06/documents/fy-20-21-oar-np-guidance.pdf>.

<sup>7</sup> <https://cleanairact.org/events/documents/OutreachandInformationDivisionUpdates-AnnaWood.pdf>.

with the Photochemical Assessment Monitoring Stations (PAMS) network. Training for emerging issues, such as ethylene oxide, should also be prioritized.

State Implementation Plan (SIP) Development

U.S. EPA should prioritize updated and newly developed courses for State Implementation Plan (SIP) development that range from SIP basics to advanced planning procedures. Also helpful would be a course or training on changing the nonattainment status of an area, along with relevant rules and guidance.

Thank you for your consideration of these principles and priorities as U.S. EPA OAQPS seeks to update and enhance its training resources. AAPCA appreciates recent opportunities to engage with U.S. EPA on these important issues, including at AAPCA's 2019 Fall Business Meeting, at the Joint Training Committee (JTC) in-person meeting in Research Triangle Park on August 29, on regular JTC conference calls, and EPA staff participation in AAPCA Training Committee conference calls. If you have any questions, please contact Jason Sloan, AAPCA's Executive Director, at [jsloan@csg.org](mailto:jsloan@csg.org) or (859) 244-8043.

Sincerely,

A handwritten signature in black ink that reads "Karen Hays". The signature is written in a cursive, flowing style.

Karen Hays  
Chief, Air Protection Branch  
Georgia Environmental Protection Division  
2020 President, AAPCA

CC: Mr. Michael Vince, Executive Director, Central States Air Resource Agencies (CenSARA)  
Mr. Zac Adelman, Executive Director, Lake Michigan Air Directors Consortium (LADCO)  
Mr. Marc Cone, Executive Director, Mid-Atlantic Regional Air Management Association (MARAMA)  
Mr. John Hornback, Executive Director, Metro 4, Inc. and Southeastern States Air Resource Managers (Metro 4/SESARM)  
Mr. Paul Miller, Executive Director, Northeast States for Coordinated Air Use Management (NESCAUM)  
Mr. Mary Uhl, Executive Director, Western States Air Resources Council (WESTAR)