



October 14, 2021

Ms. Laura L. Bunte
U.S. Environmental Protection Agency
Office of Air Quality Planning and Standards
109 T.W. Alexander Drive
Research Triangle Park, NC 27711

Dear Ms. Bunte,

The Association of Air Pollution Control Agencies (AAPCA)¹ appreciates the opportunity to comment on the draft content development plan for the National Air Quality Training Program, or AirKnowledge, for fiscal years (FY) 2022 – 2024. These comments build on AAPCA’s October 2019 letter to the U.S. Environmental Protection Agency’s (EPA) Office of Air Quality Planning and Standards (OAQPS) that transmitted state and local air agency principles and priorities for the development of training resources.² As indicated in AAPCA’s letter, training resources that are regularly updated, timely, and high-quality provide critical support to state and local air agencies and help U.S. EPA meet obligations under Section 103 of the Clean Air Act (CAA).³

The *FY 2020-2021 National Program Guidance* for U.S. EPA’s Office of Air and Radiation (OAR) recognizes that “CAA §103(b) authorizes EPA to provide training for air pollution control personnel and agencies, and to make training grants related to the causes, effects, extent, prevention, and control of air pollution available to air pollution control agencies and other qualified entities.”⁴ With Clean Air Act training, dedicated technical and resource support for programming should be responsive to the needs of state and local agencies as co-regulators. U.S. EPA’s proposed content development plan seeks to address input gained from discussion with training partners,⁵ including during meetings of the national Joint Training Committee, and the opportunity to provide feedback on anticipated FY 2022 – 2024 training materials is a strong step toward meeting those partner agency needs.

U.S. EPA’s draft plan states that the Agency expects to complete up to 20 training materials per year for FY 2022 through FY 2024. Developed or updated materials will be based on the following curricula: Air Pollution Basics; Air Quality Planning; Permitting; Air Quality Modeling; Ambient Air Monitoring; Emissions Inventory; Air Toxics Rule Development and Implementation; and Source Emissions Testing and Monitoring. These curricula largely align with the training priorities communicated by AAPCA

¹ 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. Created in 2012, AAPCA represents 48 state and local air pollution control agencies, and senior officials from 22 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](#). You can find more information about AAPCA at: www.cleanairact.org.

² AAPCA [letter](#) to Mr. Peter Tsirigotis, Director, EPA OAQPS. October 23, 2019.

³ [42 USC §7403\(b\)](#).

⁴ U.S. EPA, [Final FY 2020-2021 Office of Air and Radiation \(OAR\) National Program Guidance](#), June 2019.

⁵ EPA’s plan lists as training partners: (1) state and local air agencies, (2) multijurisdictional organizations (MJOs), (3) tribes and tribal organizations, and (4) the EPA (the OAQPS Divisions and EPA Regional Offices).



members, including a need for introductory courses, stack test training, permitting and New Source Review, monitoring and air quality data, and state implementation plan (SIP) development. With recent and expected changes to air toxics programs and rules, the prioritization of developing (and updating) air toxics courses is welcome.

U.S. EPA's creation of air pollution control training materials under these curricula provides state and local air agency staff important opportunities to access necessary information about complex programs under the Clean Air Act. In 2020 and 2021, the COVID-19 pandemic largely shifted the format of educational offerings and accelerated the adoption of online platforms, showing that robust virtual components, including self-led options, can meet certain training needs. The proposed content development plan largely focuses on e-learning programming for the Agency's new online learning management system (LMS), but U.S. EPA should remain open and committed to helping facilitate in-person instruction when more suitable for the subject matter. For example, state and local air agency staff have stressed the importance of stack test training being instructor-led and delivered on-site, in-person.

U.S. EPA indicates in the proposed plan for AirKnowledge content development that the document "will change to some extent as each year progresses." This flexibility is an important consideration. As Clean Air Act policies and priorities emerge, U.S. EPA should continue to engage the Joint Training Committee and regional and national multi-jurisdictional organizations to understand the training needs of state and local agencies to amend content planning. Courses planned for FY 2022 on air toxics risk communication and air toxics monitoring, for example, could bring crucial, timely information to state and local agency staff working with their communities. Similarly, planned courses for permitting, including on the New Source Review and Title V programs, are helpful to ensuring permits are appropriately developed.

Thank you for your consideration of AAPCA's comments on the U.S. EPA's draft content development plan for AirKnowledge. The Association's members look forward to continued engagement on training efforts, including potential changes to the new LMS that was released in 2020 to replace the Air Pollution Training Institute (APTI-Learn). If you have any questions regarding these comments, please contact Mr. Jason Sloan, AAPCA's Executive Director, at jsloan@csg.org or (859) 244-8043.

Sincerely,

Bryce Bird
Director, Division of Air Quality
Utah Department of Environmental Quality
2022 President, AAPCA