NACAA
national association of clean air agencies

August 15, 2012

Gina McCarthy
Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Ms. McCarthy:

On behalf of the National Association of Clean Air Agencies, we are writing to express our support for the National-scale Air Toxics Assessment (NATA) and to urge EPA to continue to provide funding to maintain and improve this valuable tool for air quality professionals and the public. As you know, NACAA is a national, non-partisan, non-profit association of air pollution control agencies in 45 states, the District of Columbia, four territories and over 115 metropolitan areas. The air quality professionals in our member agencies have vast experience dedicated to improving air quality in the United States. The comments we offer are based upon that experience. The views expressed in these comments do not represent the positions of every state and local air pollution control agency in the country.

We believe that the information NATA provides is valuable to state and local air agencies' efforts to track progress about emission reductions of hazardous air pollutants (HAPs). NATA is an important tool that provides a consistent evaluation of the National Emission Inventory (NEI) for HAPs. These evaluations have resulted in significant improvements in the quality of the information currently contained in the NEI. This is a result of considerable cooperation between EPA and numerous state and local air pollution control agencies to ensure that information contained in NATA is up-to-date and accurate. The quality of NATA continues to get better with each iteration of the program and we believe it should continue to improve.

The NATA data provide a variety of benefits, including, but not limited to, the following:

- supplying information about air quality and potential risks in places without HAP monitoring data;

- offering information and periodic assessments that are useful for planning and setting priorities for HAP-reduction strategies;

- assisting state and local efforts related to quality assurance and quality control for HAP emission inventories, modeling and monitoring;

- supplying information about background concentrations of HAPs, which is particularly helpful if a new facility is to be sited;

- communicating with and educating the public about HAPs and associated health risks from exposure to HAPs;

- assisting state and local efforts to address HAP risks in environmental justice and environmentally challenged communities;

- tracking trends and progress related to federal, state and local air pollution control strategies being used to reduce HAP emissions and risks;

- providing a much more comprehensive and defensible tool than the Toxics Release Inventory (TRI) Risk-Screening Environmental Indicators (provided that EPA does not continue to use TRI to generate NATA results to the extent that it currently does); and

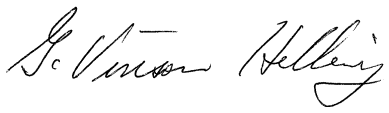
- evaluating HAP data in terms of a complete inventory of stationary, mobile and background sources, as well as up-to-date toxicological and exposure factors.

While many state and local air agencies have found NATA to be extremely valuable, there are ways in which it could be enhanced and made even more useful. For example, in the past, the data have already been several years old upon public release, so we recommend that EPA improve the timeliness of the release of the data. Additionally, we suggest EPA continue to improve how the NATA data are developed and disseminated. Importantly, because conservative risk factors and assumptions are used to produce the data and because NATA includes modeling and estimates, some risks are overstated and do not reflect real-world conditions. Consequently, it is critical that EPA continue to identify ways to produce more realistic information for use by state and local agencies and the public. If EPA continues to use TRI data, in lieu of data provided by state or local air agencies, to develop some of the NATA values, we recommend that EPA be responsible for verifying this data upon request by the state or local agency. Further, when a state/local air agency has taken the time to thoroughly quality assure EPA's data and provide EPA with facility- and unit-specific corrections, EPA should use the state/local data unless there is an overwhelming reason to use EPA's data. Finally, EPA should develop more understandable caveats that would help state and local agencies qualify the information and provide the public with appropriate cautions about interpreting and using the data.

NATA is a valuable tool for many state and local air agencies and the public. It is the best, most complete assessment of HAP human health risk that we currently possess, but it could benefit from ongoing improvement. NACAA would be pleased to work with EPA on such improvements and we urge the agency to contact NACAA to discuss specific

recommendations. We encourage EPA to continue to provide NATA as a tool for state and local air agencies and the public and to work to increase its usefulness. Please let us know if we can provide you with any additional information on this topic.

Sincerely,



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