

## Transcription of Oral Comments Recorded During June 24, 2013 Public Hearing in Muscatine

**Greg Jenkins:** Good afternoon, I'm Greg Jenkins with Greater Muscatine Chamber of Commerce and Industry. We represent 392 businesses and members within the community. We want to come forward today and just say how pleased we are with the level of cooperation the businesses that are involved in this have shown and how we're very happy to see that the modeling that's been done, all of the expense that they've gone through and will go through today, is gonna prove out to bring us, and retain us in attainment. These businesses have come a long way to help make this a better community, not only in this effort, but what they do everyday and we're very pleased to have them as members of our community and we look forward to the time when we get to the other side of this and it will, all of that will enable this to be a great town and also to draw more business into the community. Thank you.

**Jim McGraw (JM):** Thank you. Next up is Sherry Leonard, CLAM.

**Sherry Leonard:** My name is Sherry Leonard, I'm uh, here on behalf of the Board of Directors of Clean Air Muscatine. I would like to comment on the proposed state implementation plan for 2006 24 hour particulate matter PM 2.5 standard in Muscatine County. CLAM is a non-profit membership corporation established for the purpose of promoting a cleaner environment in Muscatine County. We are about 150 members; primary focus of CLAM's efforts has been to bring public attention to, and to support, effective remediation of the poor air quality in the community that adversely effects the health of our citizens and the economic volatility of our region. (Cough) Excuse me. To that end we are supportive of effective regulatory action based on sound public health and scientific research aimed to clean our air. We know that our excessive fine particulate matter, or PM 2.5 emissions, deprive healthy people of their ability to live their lives as actively as they might wish. We know that such emissions pose real threats to the health of our citizens, particularly the most vulnerable, children and the elderly, and those with chronic respiratory health conditions. We also know that excessive PM 2.5 emissions impede our community's ability to enjoy economic progress. New businesses and vital workers with skill assets for tomorrow's industries, if given a choice, will choose to live and to work in communities with air quality does not impede their enjoyment of life and threaten their health and health of their families. Businesses that are looking for a place to locate or to expand will be deterred from locating in a community that has failed to assure all citizens access to a clean, healthy environment. Under current law, every day citizens face a daunting task when trying to advocate for a cleaner environment. On the one hand it is those very people who suffer from most environmental pollution, they live in the neighborhoods, they attend the schools, and go to work in places where the atmosphere is the most polluted, although they make the best of it. On the other hand, every day citizens do not have the resources to hire expert witnesses, to make independent analysis of the sources of pollutants and available remedies to alleviate those sources and to present those findings to governmental agencies at public hearing such as this one. That we are empowered to regulate the emissions of pollutions, therefore when it comes to protecting us from the harmful effects of air pollution, every day citizens such as those are members of CLAM and those for whom CLAM advocates are extraordinarily dependent upon the competence and good will of those who work in our businesses and that who are in government and tasked to regulate those businesses to be certain that our environmental laws are based in good science and are reasonable and are fairly and firmly applied. We want good jobs in Muscatine, we also want clean air. We should not be forced to make a choice between them, one or the other. We are deeply disturbed that our home, Muscatine, Iowa, has become an out layer nationally and for the quality of its air. Because of the quality of our air we are in grave danger of becoming a fly-over community when it comes to those who are looking for a place to start or expand a new business. Citizens in Muscatine who has experienced a deterioration of their environment are sometimes left to wonder whether in, at at least some instances, the enforcement of our environmental laws has been too lax. Muscatine's air quality deterioration has not happened suddenly, it has been caused over a period of years and largely by a few regulated businesses whose owners have not been, who have been indifferent to our laws and harms caused by those laws that are not followed. To come to this hearing is to articulate our unwavering support of a new and better era when it comes to enforcing our environmental laws. As a citizen run environmental activist group, we are aware that on August 15<sup>th</sup>, 2011 the US Environmental Protection Agency found that the Iowa's state implementation plan is substantially inadequate to maintain the 2006 24 hour National Ambient Air Quality Standard for PM 2.5 in Muscatine County. For all practical purposes Muscatine met the requirements to be put in non-attainment for PM 2.5, yet rather than a designation of

non-attainment the EPA gave Iowa DNR the opportunity to address the issue with a revised SIP and short of EPA requirements, on numerous accounts, two are stated below. The EPA's call for Iowa SIP revisions says, 'all adopted measures to achieve reductions necessary to attain and maintain the 2006 24 hour PM 2.5 standard should be implemented no later than two years after the issuance of this final SIP.' Furthermore, EPA states that 'we expect that the date for attainment will be the first full calendar year following the required implementations of controls. The first full calendar year, which begins after the two year anniversary of effective date of this rule,' EPA issued the SIP call on July 14<sup>th</sup>, 2011 and the rule became effective August 15<sup>th</sup>, 2011, therefore two year anniversary August 15<sup>th</sup>, 2013 is the first anniversary following is in 2014. The Iowa DNR proposes a phased implementation schedule that begins in 2013 and concludes in December 2016. States that the attainment requirements established by EPA in the SIP can be achieved by the end of calendar year 2017. This is a three or/ to four year discrepancy between the Iowa DNR's proposal and the schedule of implementation in the EPA's SIP call. While the Iowa DNR mentions the scale and complexity of changes at GPC and that GPC has developed a phased implementation schedule there is no adequate explanation as to why there is a delay of attainment until 2017. The SIP call says that this SIP revision should 'clearly identify measures that could be timely adopted and implemented. A Schedule and procedure for adoption and implementation, a specific time limit for action by the state.' The Iowa DNR's draft SIP does not do this. Instead, regarding contingency measures, there is a vague language about the submission of an emissions control program for applicable sources in the area. Regarding the timeline, the draft SIP states, that the control program will be feasible to implement within 24 months of 2020. What leads the Iowa DNR to believe that this is State agency cannot clearly identify the control measures? And in conclusion, we support the jobs that local industry provides, we also appreciate and look forward to our government's diligent, firm, and fair enforcement of our environmental laws yet the lack of specific actions and timeline is not only disheartening but also contrary to the requirements of the final SIP. CLAM urges the Iowa DNR to, please, significantly revise this plan to include specific actions that are not needed for the implementation and a timeline. If the timeline does not meet the EPA requirements then we also urge the Iowa DNR to provide a detailed explanation of the cause of this delay. And respectfully, my name is Sherry Leonard. Thank you.

**JM:** Thank you Sherry. Next up is Lynda Smith.

**Lynda Smith:** Hi, my name is Lynda Smith and as I said earlier, I live up by Greenwood Cemetery and I have three air purifiers in my home and they are changed monthly. And when you buy them they're white and this dust is what you breathe in a month's time. These are white when they're new and I would like to see the DNR start checking for acetaldehyde in Muscatine. Thank you.

**JM:** Thank you Lynda. Well that was everyone who signed up to make comments. Is there anyone who would like to make comments now that didn't have a chance to sign up earlier? Maybe just made up your mind that you want to do that now? Alright, well if you decide you do want to submit comments, like I said there's still time to submit written comments to us. It doesn't have to be a formal letter, you can just send me an email, our contact information's on the slide there. I ask to receive that by 4:30 tomorrow so we have plenty of time to review that and respond to comments before we have to move forward with our final plan to the EPA, so.

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