



IOWA ASSOCIATION OF  
BUSINESS AND INDUSTRY

*The Voice of Iowa Business Since 1903.*

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Ms. Catharine Fitzsimmons  
Bureau Chief, Air Quality Bureau  
Iowa Department of Natural Resources  
7900 Hickman Road  
Windsor Heights, IA 50324

Dear Catharine,

On behalf of the 1,400 member companies of the Iowa Association of Business and Industry (ABI), thank you for including ABI in the recent PM2.5 workgroup implementation process. ABI members employ over 300,000 Iowans and the decisions made by the Iowa DNR directly impacts the employees and the companies who employ them. The opportunity for ABI members to sit at the table, comment and provide expertise to DNR is an example of the public-private partnership ABI members seek to have with all regulators. ABI members appreciate being involved in the process in order to provide increased transparency and the opportunity to express opinions, share technical expertise, and educate the DNR about the impact any proposed regulations would have on the regulated community and economic development. ABI members would like DNR to consider the comments below when developing future workgroups.

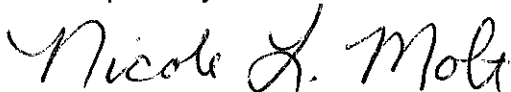
- 1) **Time.** Many ideas were developed from the workgroup meetings. However, ABI members, like DNR employees, have many responsibilities within individual companies. Also, like the DNR, many companies have had substantial cutbacks and are doing more with less. The workgroup process required representatives of companies to serve on smaller groups and participate in the full workgroup in order to have input to final recommendations. In addition to the private sector resources provided during this work group; DNR also had multiple staff members who were engaged in the full workgroup meetings and others running the smaller workgroups. Given reduced resources for both parties, an evaluation of the existing process to make it more efficient and less time consuming would be beneficial. Many ABI member companies have well documented and supported ideas of how best to address the PM 2.5 issue and are willing to share those with DNR.
- 2) **Input.** The purpose of the stakeholder meetings was to receive input from all interested parties to ensure Iowa has a process for PM2.5 evaluation and permitting based on sound science and data that protects public health while considering the economic impact to affected stakeholders. Several times at each full workgroup meeting, DNR staff requested the smaller subgroups reconsider the recommendation due to the perceived impracticality of DNR being able to implement the recommendation under current conditions. The intent for a stakeholder group is for varying interests to work together to come up with a solution that may or may not fit in with "business as usual" at the DNR. Solutions could include changing the current process at DNR. Unfortunately, DNR staff discouraged any suggestions of

change in the status quo. ABI members were very disappointed in the DNR response to new ideas or suggestions on modifying the current processes. ABI suggests one way to curb this type of situation from arising again is to have an outside person facilitate the process. A facilitator would help keep the workgroup on track, facilitate discussion between DNR and stakeholders, and ultimately help reduce the resources needed because of their ability to keep the process moving forward.

- 3) **DNR's position on modeling and monitoring.** ABI members have a philosophical difference with the DNR when it comes to the decision to require that modeling be conducted prior to permit issuance for minor New Source Review projects. The existing approach assumes facilities are guilty until they prove attainment via a worst case estimation of ambient air quality impacts through an imperfect tool. Iowa's neighbor to the east, Illinois, generally assumes existing rules and emission standards are protective of the NAAQS and limits the use of modeling to major NSR projects and limited special cases. Other states as well do not use modeling to prove attainment prior to permit issuance unless required by the EPA. ABI believes DNR should not model for PM2.5 other than required by federal rules. Modeling for PM2.5 is premature and the DNR has not shown that any increased benefits in public health or protection of Iowa's resources would occur.

ABI members hope you will consider the comments above and share with others within your agency that may benefit from this feedback for future workgroups. Thank you again for the opportunity for ABI members to participate in the PM2.5 workgroup process. ABI members look forward to receiving and reviewing the final product and working with the DNR to finalize an acceptable solution to PM2.5 implementation.

Respectfully submitted,



Nicole Molt  
Director, Government Relations