



IOWA CHAPTER

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STATEMENT OF THE IOWA CHAPTER OF THE SIERRA CLUB

ON

PROPOSED RULES REGULATING PM_{2.5} EMISSIONS

General Statement

PM_{2.5} is a serious health threat and must be effectively regulated. EPA has recognized this fact and has required Iowa to submit a plan to control PM_{2.5} in 2011. EPA is also in the process of developing rules and guidance on various issues related to PM_{2.5}. Iowa does not need to await EPA rules and guidance, but when EPA does issue rules and guidance, they should be implemented by DNR expeditiously.

Modeling/Ambient Air Monitoring

The subcommittee has recommended that no modeling be required and that PM₁₀ be used as a surrogate for PM_{2.5}, and that in modeling for PM_{2.5}, the PM₁₀ modeling guide be used against PM₁₀ NAAQS. We do not agree with this recommendation. It is just an attempt to avoid addressing the emissions of PM_{2.5}.

The subcommittee surveyed other states to determine how other states are addressing the modeling of PM_{2.5} for minor sources. Of the states that responded to the survey, 8 are currently modeling for PM_{2.5}. Six additional states are not currently modeling for PM_{2.5}, but plan to do so. If other states can model for PM_{2.5}, we see no reason why Iowa cannot.

Nor is there any reason to use PM₁₀ as a surrogate or to model against PM₁₀. According to the survey of other states, Connecticut models for PM_{2.5}, and does not use PM₁₀ as a surrogate and models against PM_{2.5}. Our program can, and should, mirror Connecticut's. If Connecticut can do

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it, there is no reason Iowa cannot. Connecticut has issued modeling guidance and NSR modeling policy and procedure related to PM_{2.5}. Iowa can use the Connecticut documents to establish guidance and policies and procedures for Iowa.

The survey of other states also indicated that some states use the model set forth in 40 C.F.R. Part 51, Appendix W. As an alternative to the Connecticut model, Iowa could do as some of the other states and use the federal model.

Given the high background levels of PM_{2.5} in Iowa, it is imperative that we use PM_{2.5} as the standard for modeling and not use PM₁₀ as a surrogate or as the NAAQS.

As EPA finalizes test methods, DNR should simply incorporate those into the state rules. A workgroup to discuss future PM_{2.5} modeling policy is not necessary.

Policy/Government Relations

We generally support Recommendation 1. The proposal could be a little more clear in emphasizing that the fiscal impact statement should look at environmental and public health benefits of PM_{2.5} regulation and the adverse environmental and public health impacts of not regulating it.

Regarding Recommendation 2, again we generally support it. However, the stakeholder process described in the recommendation should include environmental and public health stakeholders.

Recommendation 4 should include a recommendation that the DNR acquire more monitoring equipment and install the equipment in every county to obtain accurate data. This is important given the high background levels of PM_{2.5} across the state.

Although a grace period is not necessarily inappropriate, Recommendation 5 should be amended to add that if a facility is flagrantly not in compliance, enforcement action should be undertaken.

The public education program described in Recommendation 6 should include information on the adverse impacts of burning green wood in fireplaces, outdoor wood boilers, and campfires.

In Recommendation 7, we believe the funding should be shared by the public who are benefiting from clean air, and by the permittees who are causing the pollution of the air.

On the Books/Transport/Precursors

Ammonia is a problem especially related to CAFOs. We need more than education and outreach on best practices. We need regulation. Voluntary compliance has been shown to fail. Ammonia from CAFOs has

long been a serious problem in Iowa and the DNR needs to adopt strong regulation to control this problem.

Area Sources

Some of these recommendations have had some major changes since the full committee reviewed them at the last meeting. This is the only sub-committee that has made such significant changes without time for two reviews of the full committee.

Refer to our full comments that were submitted to the subcommittee.

Emission Inventory and Stack Testing

DNR needs to monitor and inventory EPA rules and guidance and implement those without delay.

Transportation

DNR should conduct a study of feasibility of emissions testing of vehicles, particularly focused on older vehicles, versus how much PM_{2.5} would be prevented. Although these programs have not always been popular among certain segments of the population, you need to balance the costs of health risks and illnesses with the costs and benefits of the emissions testing. Without a detailed study, this balance is unknown.

Permitting

Regarding the second recommendation, the techniques for evaluating permits by rule should not depend on acceptance by affected stakeholders. The evaluation should be based on the facts.

Sincerely,

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Wallace L. Taylor, Legal Chair

/s/ Pamela Mackey Taylor
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