National Milk Producers Federation

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April 17, 2006

Docket ID No. EPA-HQ-OAR-2001-0017
Docket ID No. EPA-HQ-OAR-2004-0018
Environmental Protection Agency
Mail code: 6102-T
1200 Pennsylvania Ave., NW
Washington, DC 20460

Re: National Ambient Air Quality Standards for Particulate Matter, Proposed Rule; Revisions to Ambient Air Monitoring Regulations, Proposed Rule, Amendments

To whom it may concern,

The following comments are being submitted on behalf of the National Milk Producers Federation (NMPF) to the Environmental Protection Agency's (EPA's) proposed rules: National Ambient Air Quality Standards for Particulate Matter (Docket ID No. EPA-HQ-OAR-2001-0017) and Revisions to Ambient Air Monitoring Regulations (Docket ID No. EPA-HQ-OAR-2004-0017). The National Milk Producers Federation, based in Arlington, VA, develops and carries out policies that advance the well-being of U.S. dairy producers and the cooperatives they collectively own. The members of NMPF's 33 cooperatives produce the majority of the U.S. milk supply, making NMPF the voice of nearly 50,000 dairy producers on Capitol Hill and with government agencies. The proposed rules have the potential to impact many dairy operations across the country, in particular the dairy operations in the Western States, where wind-blown dust is a common occurrence in the arid regions.

NMPF appreciate EPA's effort to accommodate dairy operations by excluding agricultural sources from the NAAQS for particulate matter proposed rule. However, NMPF has several concerns about the proposed rules to implement a $PM_{10-2.5}$ standard, the proposed changes to the $PM_{2.5}$ standard and the potential impact on dairy operations regarding the proposed revisions to the ambient air monitoring regulations for the reasons stated below.

Comments on Proposed National Ambient Air Quality Standards (NAAQS)

Because there is a lack of conclusive scientific evidence that has found $PM_{10-2.5}$ to cause adverse health effects, NMPF discourages EPA from promulgating a NAAQS for $PM_{10-2.5}$. Before EPA establishes a $PM_{10-2.5,}$ NMPF encourages EPA to establish a national monitoring program, as recommended by the Clean Air Scientific Advisory Committee (CASAC) in 2005. Establishing a motoring network before implementing a $PM_{10-2.5}$ standard will aid in a better understanding the toxicity of $PM_{10-2.5}$ dusts.

If EPA should chose to adopt a $PM_{10-2.5}$ standard, NMPF fully supports the proposed exclusion of agricultural sources. There is very little epidemiological evidence which associates rural $PM_{10-2.5}$ exposure with negative human health effects. As EPA has stated in the proposed rule, the $PM_{10-2.5}$ is typically created from wind-blown crustal materials, which have been shown to be nontoxic. EPA states "Epidemiologic studies that have examined exposure to thoracic course particles generally found in urban areas… generally support the view that the mix of thoracic course particles found in urban areas is of concern to public health, in contrast to natural crustal dust of geologic origin" (FR 2666). Furthermore, EPA also states that another study examining the effects of PM10-2.5 found that wind-blown rural dust is not likely associated with mortality (FR 2658).

Additionally, if EPA chooses to adopt a $PM_{10-2.5}$ standard, NMPF would like EPA to clarify that agricultural sources located in non-attainment areas for the proposed $PM_{10-2.5}$ NAAQS are not be subject to controls in the state's State Implementation Plan (SIP). This clarification would be beneficial in the final rule because certain SIPs, such as California's SIP, has particulate matter regulations that impact dairy operations. NMPF also suggests that EPA clarify that there is no need for states to control agriculture sources of $PM_{10-2.5}$ because of the lack of evidence for adverse health effects.

Regarding the $PM_{2.5}$ NAAQS, NMPF believes agricultural operations should be excluded from these standards, as EPA has proposed to do with the $PM_{10-2.5}$ NAAQS. Several studies have shown that $PM_{2.5}$ from urban sources differs from rural sources. Research indicates that non-urban $PM_{2.5}$ is re-suspended crustal material with very low toxicity compared to the $PM_{2.5}$ in urban areas. Because the $PM_{2.5}$ in rural areas generally results from wind-blown dust, it is not likely that there is a large human health risk. Furthermore, the studies EPA relied upon to develop the proposed rule were based on health effects of $PM_{2.5}$ from urban populations. Therefore, regulations should not be set in place if there is no evidence of adverse health effects from rural $PM_{2.5}$.

NMPF recommends that if EPA does not exclude agricultural sources from the $PM_{2.5}$ NAAQS, then the 24-hour standard of 65 $\mu g/m^3$ should not be lowered to 35 $\mu g/m^3$. The annual standard of 15 $\mu g/m^3$ should remain unchanged as well. Fugitive dust and other agricultural $PM_{2.5}$ sources at the level measured in ambient air have never been documented to have adverse human health effects.

Revisions to the Ambient Air Monitoring Regulations

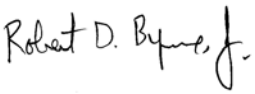
For the proposed amendments to the Revisions to Ambient Air Monitoring Regulations, NMPF has concerns about the placement of the new monitoring systems.

NMPF supports EPA's plan to place the monitoring systems in high-population locations where concentrations of PM10-2.5 are dominated by re-suspended dust and other PM emissions from high density traffic on paved roads, and PM created from industrial and construction sites. The monitoring system should be properly designed and maintained to measure only the particles that EPA intends to regulate. In order for the proper differentiation of urban and non-urban sources, the monitoring system proposal should include specific procedures, including quality assurance and data certification. NMPF also supports EPA's five-part suitability test which is focused on the selection of urban and industrial areas to permit implementation of the PM10-2.5 NAAQS. EPA should also require the use of validated continuous measurement techniques as well as Very Sharp Cut Cyclone monitors as improvements to the Federal Reference Method and Federal Equivalent Methods.

In summary, NMPF appreciated EPA's effort to exclude agriculture sources from the $PM_{10-2.5}$ NAAQS. However, we strongly urge EPA implement a national monitoring program that would determine the health effects in rural areas before implementing a $PM_{10-2.5}$ standard. NMPF also encourages EPA to exempt agricultural sources from the $PM_{2.5}$ NAAQS, or should EPA include agriculture sources in the $PM_{2.5}$ standard, the 24-hour and annual standards should not be lowered.

NMPF appreciates the opportunity to provide comments to these proposed rules. Please let us know if we can provide additional information or clarification of our comments.

Sincerely,



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