

July 14, 2010

The Honorable Governor M. Michael Rounds
500 E. Capitol
Pierre, SD 57501

Dear Governor Rounds:

On behalf of South Dakota's ag producers, we're writing to express our concerns about ongoing action at the U.S. Environmental Protection Agency to further regulate dust, which could have devastating consequences for South Dakota's ag industry.

EPA is in the process of reviewing the particulate matter (PM) national ambient air quality standards (NAAQS). In accordance with the Clean Air Act, every five years EPA must consider whether the PM NAAQS needs to be revised in light of more recent information. The PM NAAQS is comprised of standards for both PM₁₀ (coarse PM) and PM_{2.5} (fine PM).

While EPA's primary focus in this review has been on the PM_{2.5} standard, it is also considering whether to revise (reduce and make more stringent) the current PM₁₀ standard. That standard is now set conservatively low based on historically flawed health studies. In fact, in the 2006 final PM NAAQS rule, EPA acknowledged that the current 150 µg/m³ PM₁₀ standard was set based on a desire to be cautious and not on clear evidence that this very stringent level was necessary to protect against adverse public health effects. This is especially true for the type of rural coarse PM that predominates on agricultural and other resource-based operations.

Our members are very concerned that any decision by EPA to reduce the level of the current PM₁₀ standard would put many areas of South Dakota into nonattainment status under the Clean Air Act, thus placing more stringent limits on existing businesses and future growth. In fact, one of EPA's independent science advisors has cautioned EPA that any reduction in the current PM₁₀ standard would put more areas in the West into nonattainment without any public health benefit. This is because rural coarse PM dominates in these areas and that is the type of PM₁₀ that EPA and its science advisors have agreed is of little public health concern.

Though the Clean Air Act does not allow EPA to consider economic consequences of any reduction in the NAAQS, we ask you to send a letter to EPA opposing further reductions in the PM₁₀ standard. We urge your immediate action because the health evidence does not support a modification of the standard, which would have potentially devastating impacts on our state's ag operations and, therefore, our economy.

We would be happy to provide more information and background on the PM₁₀ NAAQS and its impact on agricultural and other resource-based operations. If you would like additional information or have questions, please contact any one of our organizations.

Regards,

SD Association of Conservation Districts
SD Association of Cooperatives
SD Cattlemen's Association
SD Dairy Producers
SD Farm Bureau
SD Soybean Association
SD Stockgrowers Association
SD Wheat, Inc.

cc: Steve Pirner, Secretary, Department of Environment & Natural Resources
Jon Farris, Acting Secretary, Department of Agriculture
Senator John Thune
Senator Tim Johnson
Representative Stephanie Herseth Sandlin