



STATE OF SOUTH DAKOTA
M. MICHAEL ROUNDS, GOVERNOR

August 10, 2010

South Dakota Association of Conservation Districts
South Dakota Association of Cooperatives
South Dakota Dairy Producers
South Dakota Farm Bureau
South Dakota Soybean Association
South Dakota Stockgrowers Association
South Dakota Wheat, Inc.
South Dakota Cattlemen's Association
435 Chapelle Street
Pierre, SD 57501

Ladies and Gentlemen,

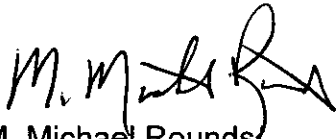
Thank you for your letter on behalf of South Dakota's agriculture community regarding the United States Environmental Protection Agency's (EPA) ongoing process to further regulate dust. I am concerned that a lower dust standard may negatively impact not only our state's agriculture industry, but all South Dakota businesses.

Recently I sent a letter to EPA Administrator Lisa Jackson (enclosed), urging EPA to maintain the current standard for particulate matter. In addition, the Department of Environment and Natural Resources (DENR) was asked to respond to this concern. EPA is currently accepting comments on its second draft document related to the review of the National Ambient Air Quality Standards for particulate matter (PM). The DENR and the South Dakota Department of Agriculture are working together to prepare comments. Both agencies agree EPA should not lower the PM₁₀ standard or set a PM coarse standard until there is adequate scientific data to justify such a change.

Your letter indicated a willingness to provide additional information on the PM₁₀ National Ambient Air Quality Standard and its impact on agricultural and other resource-based operations. If you have further suggestions, please submit them to Brian Gustafson at brian.gustafson@state.sd.us.

As this process moves forward, I hope our efforts result in EPA using the best science in developing standards to protect public health. Thanks again for your letter.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Michael Rounds". The signature is stylized with a large initial "M" and a long, sweeping tail.

M. Michael Rounds

MMR:ls

Enclosure

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



STATE OF SOUTH DAKOTA
M. MICHAEL ROUNDS, GOVERNOR

August 3, 2010

Lisa P. Jackson, Administrator
U.S. Environmental Protection Agency
Ariel Rios Building, Mail Code 1101A
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

VIA Fax: 202.501.1450

Dear Administrator Jackson,

I am writing to express my concern with the United States Environmental Protection Agency's (EPA) standards review, which suggests reductions to the current National Ambient Air Quality Standard (NAAQS) for particulate matter 10 microns in diameter or less (PM₁₀). Reducing the PM₁₀ standard will have significant negative impacts on many South Dakota businesses, including our state's number one industry—agriculture.

The proposal to lower the existing standard from 150 micrograms to 65 micrograms per cubic meter represents a significant adjustment that is not based on adequate data. In a July 8, 2010, report titled "Quantitative Health Risk Assessment for Particulate Matter," EPA concluded that significant limitations in both the health effects database and the current PM_{10-2.5} monitoring network continue to exist. It further concluded that current available information does not support conducting a quantitative risk assessment for PM_{10-2.5}. Given this lack of data, it would be prudent to leave the PM₁₀ standard at the current level of 150 micrograms per cubic meter.

Establishing a lower 24-hour PM₁₀ or PM_{10-2.5} standard without adequate scientific justification places an unreasonable burden on agricultural activities with virtually no benefit to public health. A May 17, 2010, letter to EPA from the Clean Air Scientific Advisory Committee (CASAC) suggested a single national standard may not be justified, noting that "urban thoracic coarse particles appear to be more toxic than rural PM₁₀. Thus, no single measure of thoracic coarse fraction can be applied uniformly across all sites." The CASAC clearly stated what South Dakota farmers and ranchers have always known; urban particulate matter and rural dust are not created equally.

Administrator Jackson

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Setting a stringent national standard based on incomplete evidence is a dangerous precedent that will negatively impact the rural businesses upon which our state's economy depends. It is clear, scientific evidence does not support the more stringent NAAQS, and I encourage you to leave the PM₁₀ at its current level. Thank you for your consideration.

Sincerely,

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M. Michael Rounds

MMR:ls