



*Forging a partnership between farmers and consumers. * Working together for Ohio's farmers.*

April 12, 2006

Air and Radiation Docket and Information Center
United States Environmental Protection Agency
Mailcode: 6102T
1200 Pennsylvania Avenue, NW.
Washington, DC 20460

Re: Docket ID No. EPA-HQ-OAR-2001-0017

To Whom It May Concern:

The Ohio Farm Bureau Federation (OFBF) would like to thank you for the opportunity to review and submit comments on the proposed revised National Ambient Air Quality Standards for Particulate Matter (PM) by the U.S. Environmental Protection Agency (USEPA).

OFBF is a grassroots organization of more than 225,000 members in the state of Ohio. We support reasonable efforts and science based research to address issues such as water quantity and quality, air quality, and the voluntary adoption of best management practices. OFBF's comments are directed to the proposed national air quality standards for coarse particulate matter (PM 10-2.5), those particles smaller than 10 micrometers in diameter but larger than 2.5 micrometers.

The Clean Air Act requires that the USEPA set National Air Quality Standards to limit ambient air levels of designated "criteria air pollutants", including PM. The proposed new coarse PM standard is directed to any ambient mix of PM 10-2.5 where the majority of coarse particles are resuspended dust from high-density traffic on paved roads and PM generated by industrial sources and construction. Excluded in the proposed standard would be any ambient mix of PM 10-2.5 where the majority of coarse particles are rural windblown dust and soils and PM generated by agricultural and mining sources. An annual standard for coarse PM is not being proposed because current scientific evidence does not show significant public health risks associated with long-term exposure to coarse particles.

OFBF policies support the use of best available science based information to develop and implement programs to control coarse PM. Because available scientific evidence does not support the adoption of a coarse PM standard, promulgation of the proposed coarse PM standards should be delayed until scientific research justifies a health-based standard.



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I acknowledge that USEPA's proposed rulemaking attempts to separate agricultural particulate emissions, such as windblown agricultural dust and soils, from urban particulate sources. The attempt to separate rural PM from urban PM and to exclude rural dust from the proposed "coarse" PM standard will be technically difficult to institute. It is our understanding that it will be challenged in court leading to many years of litigation.

Once again, thank you for the opportunity to provide comments and feel free to contact Dr. Larry Antosch of our staff, at 614-246-8264, if you have any questions regarding these comments.

Sincerely,

John C. Fisher
Executive Vice President

JCF/Ima