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NATIONAL COTTON GINNERS' ASSOCIATION

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August 28, 2012

By electronic mailing (a-and-r-Docket@epa.gov)

The Honorable Lisa Jackson
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: National Cotton Ginners' Association (NCGA) comments on EPA's Proposed
"National Ambient Air Quality Standards for Particulate Matter," 77 Federal
Register 38890 (June 29, 2012), Docket No. EPA-HQ-OAR-2007-0492

Dear Administrator Jackson:

The NCGA is comprised of eight regional membership organizations, which combined represent the cotton gins in all of the seventeen cotton growing states. In 2011, there were 680 active U.S. cotton gins, which processed a total crop of 15,153,000 bales of cotton. Cotton ginning is seasonal, operating about three months out of the year, and is an extension of the harvest. It is important to note that 100% of our members are small businesses. As a service to their members, several associations' staff routinely assists with environmental permitting issues relating to cotton ginning.

As an association representing agricultural processors, we support reasonable air quality rules that are based on good science and positive improvements in human health. While we support the retention of the existing PM₁₀ standard and the existing 24 hour PM_{2.5} standard, we are concerned about some of the other proposed changes and alternatives offered to the PM NAAQS. It is imperative that the current PM₁₀ standard be retained. As indicated in the PM ISA, recent studies simply do not support an adequate scientific basis for a revised standard. Without re-stating their comments, we would like to support the comments of the Coarse Particulate Matter Coalition in their entirety.

The NCGA is very concerned that any lowering of the annual primary PM_{2.5} standards will burden the economy at a time when the country is struggling to overcome the recession. These proposed PM_{2.5} standards will inhibit commercial and industrial activity not only vital to creating jobs, but also for providing tax revenue to support important local services, such as public safety and education. Worst of all this verifiable hardship will be endured for the sake of uncertain benefits.

EPA's proposed secondary standard is focused on visibility and has not been adequately explained or justified. In addition, this change is based on an inappropriate CASAC policy recommendation. The proposed secondary standard of 28 to 30 deciviews, based on the 90th percentile for 24-hour average PM_{2.5} measurements over a three-year period, is unlikely to produce measurable benefits. Given the potentially significant costs and the lack of discernible benefits from the proposed secondary standard,

EPA should not adopt a PM_{2.5} secondary welfare-based standard focused on visibility. Due to this uncertainty in the science, the secondary standard should be set at the same level as the primary standard.

EPA has previously indicated that it would need until August of 2013 to fully assess any proposed PM_{2.5} standard. The current agreement to finalize the PM_{2.5} standard by December 14, 2012 does not give enough time for a thorough review by either the agency or the public based on EPA's own estimation. EPA has twice deemed that the existing annual PM_{2.5} standard is protective of human health and the environment with an adequate margin of safety. EPA's failure to seek comment on the existing standard presumes a tighter standard.

There is serious scientific uncertainty surrounding the lowering of the PM_{2.5} standard, and the economic consequences of lowering the standard can be significant. Therefore, considering the current economic climate, it is imperative that good science becomes the key component guiding the development of this NAAQS standard. The scientific uncertainties regarding PM_{2.5} health effects are considerable. Recent studies show that harming the socio-economic status of individuals will contribute to poor health and premature death. This reality far outweighs any benefits that could be realized from a revised standard.

The NCGA believes that revising the monitoring requirement to focus on roadside monitoring is not an appropriate use of the NAAQS. The NAAQS was designed to be an ambient air quality standard, so the monitoring sites should reflect ambient air conditions to which a significant portion of the public is exposed. This proposal monitors the conditions of one specific location to which a limited group of individuals working or residing near a roadside are exposed.

The NCGA would also urge the administrator to ensure that exceptional events related to natural events, such as high winds, are treated in such a way that allows a state or local agency a clear path to exclude the data caused by these types of events at a reasonable cost. Many states do not have the expertise and resources required to meet the demonstration requirements for an exceptional event. Recent demonstrations prepared by contractors for state agencies and the San Joaquin Valley Air Pollution Control District have ranged in price from \$100,000 to \$500,000 and have required nearly 2,000 man hours over the course of approximately six months. Furthermore, in many rural areas, insufficient monitoring is available to demonstrate the "clear causal" relationships between an exceptional event and a measured exceedance even when simple visual observations would establish such a relationship.

For all of the reasons outlined above, the NCGA respectfully requests that the current NAAQS be retained for both PM₁₀ and PM_{2.5} in the final rule.

Sincerely,



Harrison Ashley
Executive Vice President