

I support the adoption of a hydrogen sulfide standard if it is based on the best available scientific information. The proposed 15 ppb health effects level is not based on the best available information and should be abandoned. The University of Iowa/Iowa State University Report recommendation is outdated and based on flawed assumptions.

I support the rule requiring all measurements be taken within 300 feet of the separated location. If the field study shows there is a health impact from AFOs at a separated location, I would support the development of air quality rules as long as they are in compliance with statutory law and developed with the support of sound science.

**991 COMMENTS SUBMITTED BY THOSE
LISTED ON FOLLOWING TABLE**

Comment Submitted By:

Name	City
Abel, Dwight	Greenville
Adams, Doug	Garner
Adams, Doug	Humboldt
Aking, Caleb	
Alexander, Lisa	Melcher
Allen, Tony	Diagonal
Allen, Vicki	Diagonal
Alliger, Larry	Gowrie
Amstutz, Bryan	Pulaski
Amundson, Bruce	Larrabee
Amundson, Donna	Larrabee
Andersen, Arlene	
Anderson, Bruce	Audubon
Anderson, Ferron	Beaman
Anderson, Ricky S	Correctionville
Anderson, Steve	Beaman
Ardary, Dana	West Des Moines
Arends, Ben	Ackley
Arens, Josephine	Brooklyn
Armitage, Craig	Iowa Falls
Armstrong, Donald J	Montezuma
Artes, Jim	Decorah
Arvidson, Ron	Malcom
Baerg, William E	Stanley
Baetsle, Kathy	Hartwick
Bahls, Richard	Rockwell City
Bair, John	Elkhart
Baitinger, Mary	Albion
Baker, Thomas J	Keota
Baltege, George	Albion
Barber, T J	
Barhite, Jim	Iowa Falls
Barker, Suzy	Tiffin
Basener, David	Meservey
Baudler, Mick	Fontanelle
Baughman, Dean	Newell
Bear, Roy	Weldon
Beaty, Robert	Des Moines
Beckman, Doug	Glenwood
Beckman, Jeanette	Glenwood
Behrens, Philip	Bloomfield
Bell, Larry	Worthington
Bender, Donovan	Wellman
Benesh, Loyal	Brooklyn
Benesh, Ruth	Brooklyn
Bentley, Alan	Diagonal
Berg, Cathy	Ellsworth
Berg, DeWayne	Ellsworth
Bergman, James	Sibley
Bergman, Patricia A	Davenport
Bergman, Steven	Davenport

Name	City
Bermel, Albert E	Muscatine
Berns, Brad G	Waukon
Beswick, Marylou	Greeley
Betten, Brandon	Jolley
Bierman, Tim	Larrabee
Birker, Robert	Vinton
Birney, Dave	Riverside
Bishop, Denise	Manchester
Bishop, Doug	Manchester
Bjustrom, Charles	Algona
Bjustrom, David	Whittemore
Bjustrom, Garry	Mt Ayr
Black, Dean	Somers
Black, Derrick	Nevada
Black, Perry	Barnum
Black, Sarah	Barnum
Blake, Keith	Eldridge
Block, Tom	Redfield
Block, Tom	Sibley
Blomquist, Francis	Stuart
Blomquist, Jessie	Stuart
Blomquist, Susan	Stuart
Blumhagen, Brian	Ames
Bodholdt, Sid	Fort Dodge
Boeh, Jeffrey L	Bettendorf
Boelling, Craig	Cumming
Boland, Gary	Williamsburg
Bolte, Doug	Albert City
Bolton, Bev	Central City
Bolton, Duane	Central City
Bolton, Duane	Central City
Book, David	Minburn
Boote, Mary	Des Moines
Boote, Nicholas	Cedar Falls
Booth, Kimberly	New Hampton
Booth, Michael	New Hampton
Boss, Ronald W	Coggon
Bower, David	Massena
Boyer, James	Ringsted
Brandt, Curtis	Waverly
Brannaman, Carol	Mt Vernon
Brannaman, James	Mt Vernon
Brannian, Donald	Brooklyn
Breach, Randy	Atlantic
Brecher, Marvin	LaPorte City
Brelsord, Jon	Rippey
Brinkman, Candace	Rolfe
Brinkman, Kyle	Rolfe
Broich, Marty	Alta
Brosnahan, Alberta	Brooklyn
Brown, Charles A	Bonaparte

Comment Submitted By:

Name	City
Brown, Marlene	Brandon
Broxvooh, Jamie	Oskaloosa
Brozik, Susan	Garner
Bruhl, Elwyn	Fort Dodge
Bryant, Ryan	Bondurant
Bucklin, Michael	Colfax
Burgmeier, Joe	Lockridge
Burke, Barbara	Central City
Burke, Ernest	Creston
Burke, John	Central City
Burnham, Mark	Pierson
Burns, Pat	Oxford
Burtch, Dixie	Onawa
Busch, Duane	Tripoli
Buskohl, Mark	Grundy Center
Butcher, Joe	Palmer
Butler, Mike	Colfax
Buyse, Jennifer	West Liberty
Buyse, Mike	West Liberty
Calmer, Dan	Des Moines
Carlson, Jim	Gowrie
Carmichael, Rich	Brooklyn
Carmichael, Robert	Brooklyn
Carney, Clifford	Adair
Carpenter, Allen	Coydon
Carroll, Gregory	Ryan
Carruthers, Randy	Columbia
Carter, Dennis	Audubon
Childers, Diana	Brooklyn
Childers, John	Brooklyn
Christenson, Alexis	Oskaloosa
Christiansen, Dale	Newell
Christopherson, Orval V	Webster City
Clark, Joe	Sibley
Clark, Ronnie	Albia
Clause, Reginald	Jefferson
Clausen, Jeffrey	Carson
Cline, Darrel	Callender
Coble, Jay	Crawfordsville
Coblor, Mark	Ottumwa
Colyn, Steve	Indianola
Compart, Marc	Lehigh
Compart, Tom	Lehigh
Conover, Brian	Ames
Cook, Lynn	Seymour
Cook, Ray	Seymour
Cook, Shirley M	Seymour
Cooper, Curtis	Dayton
Cooper, Wayne	Brooklyn
Coppola, Holly	West Des Moines
Coppola, Joe	West Des Moines

Name	City
Cornell, Chris	Ackworth
Cousins, Rob	DeWitt
Coyle, Jeremy	Urbandale
Crabb, Lowell	Kingsley
Cramer, Dan	Blairsburg
Creighton, Nolan	Hampton
Cuddeback, Jim	Washington
Culp, Shawn	Bedford
Dahzer, Lisa	Carroll
Damman, Dean	Melbourne
Dammann, Justin	Essex
Dane, James W	Iowa City
Dauterive, Don	Ames
Davidson, Jim	Brooklyn
Davidson, Jody	Brooklyn
Davis, Olive	Mt Ayr
Davis, Vincent	Early
DeBruin, Donald	Oskaloosa
DeBruin, Randy	Oskaloosa
Deheer, Tyler	Oskaloosa
Demaray, Mike	Rockford
DePauw, Mary	Brooklyn
Determan, Steve	Early
Devoe, David	Nevada
Devore, Brett	Centerville
Devos, Marv	LeMars
Diehl, Casey	Fairfield
Diehl, Melvin	Fairfield
Dietz, Rodney L	Walcott
Dittmer, Phyllis	Columbia
Dodds, Bradley	Danville
dohrmann, Dana	Hampton
Dolecheck, Eric	Kellerton
Donlon, Lisa	Monona
Donlon, Tim	Monona
Dostal, Craig	Urbandale
Dotson, Brian	Pocahontas
Doty, Mary	Brooklyn
Dougherty, Brian	Waukon
Dougherty, John	Waukon
Dougherty, Scott	Waukon
Drees, Jessi	Vail
Drees, Kenneth	Vail
Drees, Laurie	Vail
Dreeszen, Dan	Spirit Lake
Driscoll, Jean	Mechanicsville
Driscoll, Sean	Stanwood
Duhn, Tyler	Wellsburg
Duke, Steve	Keosauqua
Dykstra, Rodney	Everly
Ebering, Bryce	Wellsburg

Comment Submitted By:

Name	City
Edler, Jeff L	State Center
Edmonds, Alan	Mediapolis
Edmonds, Dale	Mediapolis
Edmonds, Patrick	Mediapolis
Eggers, Andrew	State Center
Eggers, David	State Center
Ehlers, Angela	Walcott
Ehlers, Brian	Walcott
Elliott, Craig D	Mt Ayr
Elliott, James L	Fairfield
Ellis, Jeff	Donnellson
Elm, Lynn D	Williams
England, Debra	Hubbard
England, Keith	Hubbard
Eslick, Judy	Dayton
Eslick, Roger	Dayton
Essick, Matt	Ayrshire
Essick, Stephanie	Ayrshire
Evans, Arvid	Bridgewater
Ewoldt, Gary E	Davenport
Ewoldt, Sally A	Davenport
Faas, David	Brooklyn
Faas, Mary Ann	Brooklyn
Farnaah, Dean P	Gowrie
Fascher, Harvey W	Coggon
Fay, Dennis	Churdan
Fay, Pat	Glidden
Fehr, Anita	Whittemore
Fehr, Byron	Whittemore
Ferold, Nathan	Gowrie
Feuerhelm, Scott	LeMars
Finch, Barbara	Ames
Finch, Eric	State Center
Finley, Neal	Auburn
Finley, Terry	Auburn
Firrell, Robert D	Buffalo
Fishback, Rachel	Washington
Fisher, Gladys	Kalona
Fisher, Gladys K	Kalona
Fisher, Robert W	Kalona
Fisher, Robert W	Kalona
Fisher, Tim	Aplington
Fistler, Mike	Ackley
Fitzgerald, Tom	Mechanicsville
Flanders, Les	
Fletcher, Charles	Diagonal
Foelske,	Waverly
Fogerty, Tom	Pomeroy
Folsom, Jason	Rockwell City
Folsom, Mike	Rockwell City
Ford, Loren	Brooklyn

Name	City
Ford, Sharon	Brooklyn
Fortune, Jen	Eagle Grove
Foster, Brian	Hampton
Fox, Terry	Leon
Francy, Jean	Mt Pleasant
Francy, Jerry	New London
Francy, Mike	Mt Pleasant
Frazer, Dean	Conrad
Frazer, Linda	Conrad
Freese, Darrell	Steamboat Rock
Frideres, Randy	Algona
Friederichs, Mary L	Walcott
Friederichs, William E	Walcott
Friest, Brent	Radcliffe
Fritz, Guthrey	Urbandale
Fritz, Heather	Urbandale
Fritz, Marcia	Webster City
Fuhrmeister, Eric	Coralville
Fuller, Brian	Osceola
Fulton, Tyler	Mt Pleasant
Furlin, Danny	Numa
Fy, Sean	Iowa Falls
Gago-Paustian, Carol J	Walcott
Gard, Kenneth	Sioux City
Gardner, Stephen	Ottumwa
Geisler, Rick	Ames
George, Joe	Lake City
Gerst, Karen	Mt Pleasant
Gevock, Phil	Fairfield
Gienger, Dennis	Gladbrook
Gienger, Doris	Gladbrook
Gingerich, John	Kalona
Gingerich, Martin	Parnell
Glade, Janet	Guthrie Center
Glade, Tom	Guthrie Center
Glenn, James	Des Moines
Goins, Joy	Davenport
Golinghorst, Joe	Walcott
Gordon, Darwin	Madrid
Gordon, Gail	Kensett
Gorkow, Marty	Norway
Grattan, Maretta	Grinnell
Grattan, Worthin	Grinnell
Gratz, Dennis	Farmington
Gratz, Eric	Farmington
Gratz, Sharon J	Farmington
Green, Martin	Mound
Gregory, Ward	Keosauqua
Greif, James	Monticello
Greiner, Claude	Kalona
Greiner, Jay	Williamsburg

Comment Submitted By:

Name	City
Greiner, John P	Packwood
Greiner, Randy	Malvern
Greufe, Randy	Blairsburg
Greufe, Sandra	Blairsburg
Grimm, Clifford	West Bend
Grimm, Jordan	West Bend
Grimm, Wayne	West Bend
Gropper, Jeffrey	Chelsea
Gross, Jerry W	Greenville
Grote, Jodi	Lake City
Grover, Cindi A	Elma
Groves, Matt	Massena
Habben, Shane	Everly
Hachmeister, Mark	Coon Rapids
Hagemann, Hubert	Carroll
Hagemann, Virginia	Carroll
Haker, Jim	Washington
Hall, Cory	Grinnell
Hall, John	Malcom
Hall, Tony	
Hamlin, M	Union
Hanna, Andrew	Forest City
Hanna, Mark	Forest City
Hanna, Philip	Forest City
Hansen, L	Peterson
Hansen, Steven	Audubon
Hanshaw, M	Washington
Hansman, Lou	Carroll
Hanson, Brian	Nevada
Harding, Jessica	Des Moines
Harris, Stanley C	Creston
Harris, Terry	Eddyville
Harves, Rich	Dickens
Harvey, Ramona H	Shellsburg
Haskins, Richard G	Bonaparte
Hassebrock, James	Roland
Hauding, Dennis	Des Moines
Hauser, Lee	Malcom
Heckman, Kent	Muscatine
Hegland, Carol	Ellsworth
Hegland, Merlyn	Ellsworth
Heidelberger, Gary	Coin
Heim, Jake	Boone
Heise, Nancy	Gladbrook
Heitland, Kevin	Iowa Falls
Held, Eric	Geneva
Helleso, Jerry	Malcom
Helleso, Sue	Malcom
Hemesath, Ron	Decorah
Hemesath, Thomas	State Center
Henderson, Howard	West Des Moines

Name	City
Henik, Donald	Lisbon
Hensel, Jack	Auburn
Her, Pat	Dunkerton
Herkelman, Melvin	Walcott
Hermesch, Kevin	Cedar Rapids
Hersom, Keith	Pomeroy
Hill, Craig	Milo
Hill, Donald M	Perry
Hill, Jason	Olds
Hill, Morey J	Madrid
Hill, Patti	Milo
Hill, Rusty L	Des Moines
Hilliard, Ann	Dike
Hilliard, Jon	Dike
Hinders, Russell	Ackley
Hinners, Kevin J	Exira
Hochstetter, David	Victor
Hoduefield, Glen	Radcliffe
Hoefling, Kyle	Mt Vernon
Hoegen, Steve	Farley
Hoeger, Joe	Hopkington
Hoeger, Joe	Hopkinton
Hoegh, Winston	Atlantic
Hofer, Jim	Cedar Rapids
Hofmann, John	Cedar Rapids
Hogan, Dominic	Monticello
Hogan, Karen	Monticello
Hoke, David A	Mt Vernon
Holderness, James	Iowa City
Holdsworth, Levi	Oskaloosa
Hollander, Brian	Fairfield
Holtkamp, Melvin	Donnellson
Holtkamp, Michael A	West Point
Hommel, David	Eldora
Hommel, Laura	Eldora
Hooge, Sara	Ames
Hoover, Bruce	LeClaire
Hoover, Denise	LcClaire
Hopkins, Steven	Havelock
Hoppes, Rex	VanMeter
Hora, Andrew	Riverside
Hora, Anthony E	Riverside
Hora, Thomas	Riverside
Hosek, Justin	Clutier
Hosek, Rebecca	Clutier
Hosfield, Douglas	Mt Ayr
Hotopp, Mike	State Center
Hubatka, Wilferd	Creston
Huber, Matthew	Blakesburg
Huls, Dean	Brooklyn
Hulsebus, Mark	Muscatine

Comment Submitted By:

Name	City
Hummel, Donald	Atlantic
Hutchcroft, Randy	Steamboat Rock
Ibeling, Ashley	Ackley
Ingels, Chad	Randalia
Ingels, Tammy	Randalia
Irlbeck, Mike	Coon Rapids
Irlbieck, Ed	Dedham
Irlmeier, Sandra	Kimballton
Jacobson, Edward G	Fort Dodge
Jacobson, Gene	Fontanelle
James, Kevin	Brooklyn
Janecek, Ron	Washington
Janecole, curt	Washington
Janssen, Jeannine M	Sibley
Jeffrey, James	Deep River
Jeffrey, Linda	Deep River
Jennett, Evonne	Winchester
Jennett, Evonne	Bedford
Jennett, Ken	Winchester
Jennett, Ken	Bedford
Jentzen, David	Chester
Jesina, Bill	Toledo
Jesina, Sheryl	Toledo
Johnson, Ben	Floyd
Johnson, Butch	Mt Pleasant
Johnson, Byron	Aplington
Johnson, Clark	Rockwell City
Johnson, Colin D	Slater
Johnson, Dennis & Faith	Ida Grove
Johnson, Gary	Winfield
Johnson, Keith	Rose Hill
Johnson, Lowell D	Diagonal
Johnson, Maurice	Floyd
Johnson, Rich	Onalaksa, WI
Johnson, Tim	Clive
Johnson, Tom	Essex
Johnson, Tom	Essex
Johnston, Dallas	Lenox
Jones, Jim	Dike
Jones, Kevin	Coin
Jones, Maurice	Ellston
Jorgensen, Steve	Newell
Juergensen, Chris	Churdan
Jurgens, Dean	Thornton
Jurgens, Kevin	Thornton
Jurgens, Sheldon	Sheffield
Justen, Dean	Ventura
Kampman, Grant	Aplington
Kardel, Ronald	Walcott
Kardel, Susan B	Walcott
Kasper, Glenn	Oxford

Name	City
Kasper, Pat	Oxford
Kavawaugh, Steve	Bryant
Keller, Deb	Onawa
Keller, Melvin D	Cantril
Kendrick, Steve	Carroll
Keppy, Chad	Davenport
Keppy, Glen L	Davenport
Keppy, Neal	Dixon
Kientz, Thomas E	Brighton
Kilberger, Marvin	Swisher
Kiley, John	Woodward
Kiley, Julie	Woodward
Kimm, Robert	Dysart
King, Beverly	Guernsey
King, Brian	Hampton
King, Douglas	Guernsey
King, Joani	Guernsey
King, Lee	Guernsey
Kinsinger, Larry	Ottumwa
Klaassen, Dale	Pomeroy
Klaver, Verlon	Kamrar
Kleimnann, Jonathan	Manitoba, Can
Kleitsch, Jackie	Brooklyn
Kleitsch, Michael	Brooklyn
Klenk, Annabelle	Brooklyn
Klenk, Hillis	Chelsea
Klindt, Dan	Eldridge
Kline, Steve	Afton
Klingson, Scott	Gowrie
Koedam, David	Doon
Koeneke, Steve	Greeley
Kolas, Laura	Malcom
Kollasoh, Mark	Algona
Kono, Draper	
Korte, Doug	Laurel
Kovarik, Ron	Calmar
Kraber, Eugene	West Des Moines
Kramer, Heather	Fonda
Kriegel, Joe	Brooklyn
Kriegel, Julie	Brooklyn
Kronlage, Dave	Dyersville
Kruger, Dennis	Wesley
Kruger, Dennis	Wesley
Krumwiede, Kevin S	Ledyard
Kruse, Jeffery	Silver City
Kruse, Steve	Dyersville
Kuntz, Craig	Brooklyn
Kuntz, David	Mason City
Kuntz, Richard	Wever
Lahr, Gary	Worthington
Langenberg, Ron	Cedar Rapids

Comment Submitted By:

Name	City
Lantzky, Brian	Waucoma
Larsen, Dale	Marne
Larsen, Verlene	Marne
Larson, Al	Omaha, NE
Lastorke, Don	Brooklyn
Lawson, Ken	Huxley
Lease, Jim	
Ledger, Joseph	Fairfield
Ledger, Lynn	Stockport
Ledger, Mark	Stockport
Leerar, Danny	Williams
Leicht, Randall	Clare
Lensch, James	Marion
Lenz, Cole	Rockwell City
Lesan, Marty	Kellerton
Liljedahl, Dennis	Essex
Lippincott, Dale	Brooklyn
Loeb, Tara	Mingo
Lowry, Jeremy	
Lowry, Terry	Searsboro
Lynch, Eugene	Barnum
Magdefrau, Bob	New London
Maifeld, Jami	Clive
Mailander, Jack	
Main, Jerry D	Fairfield
Mainquist, Steve	Red Oak
Malcolm, Joe	Osage
Manatt, Patty	Malcom
Marine, Michael A	Rolfe
Market, Steve	Clare
Martens, Steve	Dexter
Martin, Michael B	Lockridge
Martz, Dave	Blue Grass
Martz, David E	Blue Grass
Martz, Joan	Blue Grass
Massey, Keith	Columbus Jct
Matees, Sylvan	
Mayo, Helen	
Mayo, Malcom	
McAfee, Charles	Anita
McCartney, Mike	Hubbard
McCaw, Ross	Marengo
McComb, Roland	Brooklyn
McCombs, Doris	Brooklyn
McConohy, Michael T	DeWitt
McCoy, Tony	Lake City
McCulloh, Muri	Camanche
McCulloh, Tracey	Camanche
McDowell, Andrew	West Des Moines
McEnany, Craig	Nevada
McGee, David	Fremont, NE

Name	City
McGee, Nick	
McGreal, Kristi	Strawberry Point
McGreal, Peter	Strawberry Point
McGregor, Alan	Charles City
McKecanie, David	Atkins
McKechnie, David A	Atkins
McKim, Doug	Colfax
McMahan, Autumn	Oskaloosa
McMains, Keith	Malcom
McMannus, Wayne	Vincent
Meade, Robert J	Oxford
Meade, Russell	Tiffin
Meade, Russell J	Tiffin
Mehrums, Gary	Davenport
Meier, Michael	Clarinda
Meints, Dennis	Steamboat Rock
Mennenga, Scott	
Mente, David	Adrian, MN
Merher, Derrick	Boone
Mertens, David A	Keosauqua
Messenger, Jane	Kansas City, MO
Messerschmidt, Greg	Adel
Meyer, Larry	Wayland
Meyer, Ryan	Mt Pleasant
Mickelson, David	Lehigh
Millane, J	Fairfield
Miller, Larry	Mabel
Miller, Merle	Kalona
Minteer, Tyler	Eldora
Mitchell, Jack E	Keosauqua
Moermond, Joshua	Sutherland
Moffitt, David	
Mohnssen, W J	Letts
Montgomery, Delores	Brooklyn
Montgomery, Willis	Brooklyn
Montross, Charless	Deep River
Moore, Dean	Ringsted
Moore, Dennis	Wallingford
Moore, Max	Russell
Morgan, Gene	Brooklyn
Mowrer, Bryan	Guthrie Center
Mowrer, Teresa	Guthrie Center
Mudgett, Randy	Humboldt
Muff, Andry	Garner
Murphy, Chuck	Reinbeck
Murphy, Kevin	Lenexa, KS
Murray, Terry	Storm Lake
Myers, Josh	Oskaloosa
Naber, Dwight	Decatur
Nachtman, Arthur	Ryan
Nechanicky, Mark	Buckingham

Comment Submitted By:

Name	City
Nederhoff, Jon	Geneva
Neill, Ralph	Corning
Nelsen, Alan	Albert City
Nelson, Greg	Harlan
Nelson, Jay	Atlantic
Nelson, Jeff	Blairsburg
Newby, Dave	Bondurant
Newby, Donald	Bondurant
Newell, Dewayne	Callender
Newgard, Jesse	Laurens
Newton, Betsy	Dayton, OH
Newton, Chad	Vinton
Newton, Teddi	Vinton
Newton, William	Vinton
Nichols, Bill	Atlantic
Nickol, Lila	Dyersville
Nielsen, Donald	Milford
Niemann, Loren G	Eldridge
Nilges, Karman	Sumner
Nilges, Larry	Sumner
Noll, Diane S	New London
Noll, Ronald W	New London
Nolte, David J	Durant
Norman, Matt	North Liberty
Norman, Mike	Wellman
Norman, Steve	Washington
Norris, Marty	Humeston
Norris, Tim	Fremont, NE
Nunnikhoven, Andrea	Oskaloosa
Nunnikhoven, Lyle	Oskaloosa
Oberbroeckling, Daron	Davenport
Oberbroeckling, David W	Davenport
Oberbroeckling, Julie	Davenport
Ohr, Philip	Reinbeck
Ollendieck, Ken	Buchingham
Olson, Audrey	Vinton
Olson, Marc	Brooklyn
Olson, Steve	Dickens
Olson, Tyler	Iowa Falls
Orth, Leonard	LaPorte City
Overholtzer, John A	Tingley
Overksen, Patrick	Coralville
Pacha, Stephen R	Birmingham
Palmer, Tim	Truro
Parker, Rod	Cherokee
Patterson, Chris	St Ansgar
Patterson, Terry	St Ansgar
Patton, James L	Fort Dodge
Paustian, Dale H	Walcott
Paustian, Kent	Walcott
Paustian, Marcia	Walcott

Name	City
Paustian, Ross C	Walcott
Payne, Sara	Clive
Pearson, Douglas	Ankeny
Peckham, Jeff	Lime Springs
Pennings, Henry	Sheldon
Perry, Brielle	
Peters, Cassie	Aplington
Peters, Donald	Clare
Peters, Jason	Whittemore
Pettlon, Judy	Winthrop
Pfeiff, Richard	Morning sun
Pfitzenmaier, Phyllis	Bettendorf
Phillips, Danny	Keosauqua
Pickhinke, Steve	Early
Piekeman, Nicholas	Indianola
Pierce, Justin	Clariton
Pilch, Edward	New London
Pilling, Charles	Mediapolis
Pisarik, Richard	Centerville
Platner, Marilyn	Marion
Pliner, Doreen	Otho
Pliner, Jake	Otho
Pliner, Kent	Otho
Plowman, Jerry	Douds
Poduske, Thomas	Mechanicsville
Poe-Rhinehart, Helen	Brooklyn
Pohren, Angie	Stockport
Pomberg, Larry	
Popenhagen, Duane	Brooklyn
Popken, Timothy	Alta Vista
Poppen, Marilyn	Sibley
Porter, Kyle	Ackley
Possehl, Rochelle	Anita
Powell, Marvin	Ottumwa
Preston, Scott	Decatur
Price, Betty	Brooklyn
Price, Dennis	Coggon
Proctor, Terry	Unionville
Prose, Barbara	Ottumwa
Prose, David	Ottumwa
Putze, Aaron	West Des Moines
Quick, Francene	Bettendorf
Ranchbush, David	Brooklyn
Ranschau, Vicki	RockValley
Rarick, Clint	Oxford
Rasing, Kevin	Sumner
Rasmussen, Kevin	Goldfield
Rathe, Steve	Waverly
Read, Janiece	Malcom
Reael, Bruce	Muscatine
Reed, Bryce	Albia

Comment Submitted By:

Name	City
Reed, Ronald	Malcom
Reeve, Melvin	Iowa City
Reifschneider, David	Hubbard
Reiling, Sherry	Ida Grove
Reinig, Chad	Portsmouth
Rempp, Bill	Montezuma
Rempp, Marjorie	Montezuma
Rensburg, Mark	Lake City
Reschly, Jeffrey	Riverside
Reth, Russell	Manchester
Rhinehart, Clarence	Brooklyn
Richards, Larry	Charles City
Richter, Connie	Lime Springs
Rickels, Daniel	Anamosa
Rickels, Lynn	Anamosa
Riese, Amber	Anita
Riesenberg, Richard	Templeton
Riessen, Rod	Harlan
Rinehart, Greg	Boone
Ritscher, Robert	Keystone
Ritscher, Robert C	Cedar Rapids
Roberg, Paul	Manchester
Roberts, Gene	Ames
Roberts, Jim	Ainsworth
Robertson, Elaine	Webster City
Robey, John	Brooklyn
Robinson, Rick	Granger
Roelfs, Deanna	Ackley
Rogers, Peg	Oxford
Rohlfen, Nick	Ackley
Roudabush, Marie	Brooklyn
Roudabush, Nancy	Brooklyn
Roudabush, Roger	Brooklyn
Rumah, Ron	Earlham
Ryan, Tim	Oxford
Rydberg, David	Essex
Ryerson, Jerald	Ames
Sage, Allen	Dunkerton
Sage, Craig	Waterloo
Sage, Eric	Dunkerton
Sage, Ernest & Virginia	Dunkerton
Salmon, Dennis	Cedar Falls
Salvador, Mark	Johnston
Sander, John	Farmington
Sander, Wayne	Donnellson
Savidge, E T	Sherburn, MN
Schafbuch, Al	Dysart
Schafbuch, Ruth	Dysart
Schipper, Chad	Aplington
Schleushoe, Kevin	St, Charles, MN
Schmidt, Mary	Hawarden

Name	City
Schmidt, Timothy J	Hawarden
Schmitt, Greg	Rudd
Schneck, Rodger	Milan, MN
Schneider, Jason	Avoca
Schnekloth, Les R	Eldridge
Schnekloth, Lisa A	Eldridge
Schnell, Londa	Sully
Schomaker, Casey	Greenville
Schoonover, Curt	LeMars
Schrell, Jason	Sully
Schuiteman, Matt	Sioux Center
Schuiteman, Minde	Sioux Center
Schultz, Roy	Avoca
Schulze, Barbara	Fort Dodge
Schulze, Milford	VanHorne
Schulze, Roger	Fort Dodge
Schumacher, Frank	Pleasantville
Schumacher, Leroy	Pleasantville
Schupbach, Gregory	Ottosen
Schurr, Dan	LeClaire
Schwake, Warren	Maynard
Schwery, Mark	Vail
Schwiebert, David	Brooklyn
Schwiebert, Mary Ann	
Scott, David W	Muscatine
Scott, Herbert	Kellogg
Scott, Herbert	Kellogg
Seago, Jeremy	
Secor, James	Chariton
Seehusen, Raymond	Pocahontas
Seipold, Bret	Hastings
Seipold, Karen S	Hastings
Sells, Louie	Washington
Senn, Tammy	Alden
Settles, Gary	Winfield
Severinghaus, Joel	Des Moines
Sharer, Larry	Jewell
Shatek, James	New Hampton
Shatek, Kristy	New Hampton
Sheets, Barbara	Ionia
Sheldon, Eugene	Farragut
Sheriff, John	Ames
Sheriff, Robert	Goodell
Sherwood, Anedra	Brooklyn
Sherwood, Lowell	Brooklyn
Shoen, Thomas	Welcome, MN
Showalter, Josh	Ackley
Shurfman, Mary	Fort Dodge
Sieren, Leland	Sigourney
Simon, Joseph	Epworth
Simon, Kay	Epworth

Comment Submitted By:

Name	City
Slager, Dale J	Springville
Smith, Alison	Nemaha
Smith, Heather	Oskaloosa
Smith, James M	Coraville
Smith, John C	Manchester
Smith, John E	Bonaparte
Smith, Steven L	Mason City
Solen, Dennis	Brooklyn
Spahr, Joseph	Monticello
Spencer, Carissa	Webster City
Sporrer, Pat	Dedham
Sprair, Tyler	Ackley
Stallman, Craig	Williamsburg
Stallman, Kathleen	Williamsburg
Stamps, Steven	Diagonal
Steenhock, John	Prairie City
Steinkamp, Myra	Wall Lake
Stene, Jim	Lenexa, KS
Stenzel, Kevin	Havelock
Stephens, John E	Diagonal
Steppe, Jordan	Steamboat Rock
Stinson, Frances	Shellsburg
Stittle, Curt	Swaledale
Stock, Mark D	Waukon
Stockwell, Joyce	Laurens
Stoltzfus, Ivan	Leon
Stould, Jan	Havelock
Stoull, David	Manson
Strait, Anna M	Waukon
Strauel, Bob	Jesup
Strauel, Kathleen	Jesup
Streeper, Michael	Onslow
Streit, Keith	Gowrie
Streit, Lauri	Gowrie
Struthers, David	Collins
Struthers, David	Collins
Struthers, Donald	Collins
Struthers, Donald	Collins
Suh, Kristi	Anita
Svoboda, Greg	Shellsburg
Swailles, David	Columbus Jct
Swann, Daniel	Osage
Swann, Deborah	Osage
Swann, Dustin	Osage
Swanson, Charles E	Ottumwa
Swanson, Larry	Manchester
Sweet, Dennis & Pauline	Shannon City
Swenka, George	Tiffin
Swenka, George J	North Liberty
Swenka, Steve	Tiffin
Tackett, Wayne M	Glenwood

Name	City
Taets, Joan L	Fort Dodge
Taylor, Robert	Minburn
Teeter, Blake	Bonaparte
Teig, Paul	Roland
Tentinger, Nathan	LeMars
Tentinger, William J	LeMars
Thomas, Todd	Lamoni
Thome, Dan	Steamboat Rock
Thompson, Angie	Malcom
Thompson, Connie	Montezuma
Thompson, Steven A	VanHorne
Tichy, Jack	Iowa Falls
Tiedeman, Warren	George
Tindle, Jeff	Montezuma
Tobin, Paul	Ainsworth
Tracy, Curt	Diagonal
Travest, David	Onalaska, WI
Tripp, Brent	Dows
Truelsen, Carol	Camanche
Truelsen, Gaylon	Camanche
Truelsen, Lance	Camanche
Twinam, Paulette	Crawfordsville
Vais, Heather	Anita
Valentine, Gary	Dubuque
Valentine, Mary Beth	Dubuque
Valvick, Arlyn	Swea City
VanderLinden, Phyllis	Ashton
VanderTop, Ryan	Ames
VanErsvelde, Lois	Brooklyn
VanGorp, Bryce	Reanor
VanGorp, Carroll	Reasnor
VanMaanen, Gilbert	Pella
VanOosbree, Portlind	Algona
VanRheenen, David	Pleasantville
VanRheenen, Doran	Pleasantville
VanWaardhuizen, Julie	Oskaloosa
VanWaardhuizen, Keith	Oskaloosa
VanWyk, Lauren	
VanWyk, Robert	Oskaloosa
Vaughan, Randy	Bayard
Veldhuizen, Bryce	Eddyville
Veldhuizen, Bryce	Eddyville
Veldhuizen, Leon	New Sharon
VerMeer, Bill	Pella
VerMeer, Chris	Pella
Vermenlon, Brian	Oskaloosa
Vittetoe, Dennis	Washington
Vittetoe, Jerry	Washington
Vos, Raymond	Pella
Votava, Lonnie	Diagonal
Wadle, Rick	Fonda

Comment Submitted By:

Name	City
Wadsworth, Eddie	Iowa Falls
Walters, Charles	Eldora
Ward, Steve	Bloomfield
Warner, Daniel	Donnellson
Waterhouse, Ron	Mt Pleasant
Watze, Jed	Willmar, MN
Weems, Japheth	Ames
Welch, Ryan	Farmington
Welch, Scott	Farmington
Welch, William J	Winthrop
Weldon, Tony	Russellville
Welhilm, Ed	Atkins
Weller, Keith	Westside
Welter, Mark	Hopkinton
Wendt, Noah	Bondurant
Wergert, Seth	Clemons
Wermer, Steve	Shannon City
Werner, Ann	Diagonal
Wessling, Bruce	Grand Jct
Westrum, Jeff	Boone
Westrum, Kevin	Boone
Wheeler, Troy	Lorimor
White, Ryan	
Whitman, David R	Grand Mound
Whitman, Linda J	Grand Mound
Widmer, Curtis	Decatur
Widmer, Tina	Deep River
Wiechmann, Corwin	Hubbard
Wiederstein, Ed	Audubon
Wierck, Rick	Fairbank
Wilber, Dennis	Milford
Wiley, Mark	Norway
Williams, Cathy	Marathon
Williams, Ed	Iowa City
Williams, Hugh	Mound City, MO
Williams, Marlene	Brooklyn
Williams, Randy	Brooklyn
Williams, Ray	Brooklyn
Williams, Teresa	Brooklyn
Wilson, Lucille	Afton
Witt, Steve	Clinton
Witte, James	Callender
Witte, Rachel	Callender
Witte, Sandi	Callender
Woelber, Ken	Hull
Woodall, John	Hartley
Woody, Stan	Reanor
Wooster, Jan	Manning
Wooster, Jon	Manning
Worden, Charles A	Farmington
Wrage, David J	Dysart

Name	City
Wulfekuhle, Craig	Petersburg
Wulfekuhle, Ernie	Earlville
Wulfekuhle, Joann	Earlville
Wulfekuhle, Karen	Dyersville
Wulfekuhle, Scott	Earlville
Wuthrich, Ken	Bloomfield
Yeager, Clark A	Ottumwa
Yoder, Brenda	Wayland
Yoder, Clair	Donnellson
Yoder, Ed	Wayland
Yoder, Edward	Donnellson
Yoder, Morris	
Yoder, Myron	Kalona
Yoder, Noah	Decatur
Young, David	Stanhope
Young, Ralph	
Yungelas Haass, Leah	Ellsworth
Yuska, Wilfred	Buckingham
Zhone, Gary	Havelock
Zingula, Curt	Marion
Zingula, Gayle	Marion
Zitelman, Matt	Waterloo

I support clean air rules for factory farms based on the recommendations in the joint University of Iowa/Iowa State University CAFO air quality study. The joint University study is current, sound, and based on the best science available. I support the Department of Natural Resource's proposal for a hydrogen sulfide standard of 15 parts per billion. However, the department must move forward with an ammonia (150 ppb) and odor standard (7:1 dilution rate) as called for in the joint University study.

774 COMMENTS SUBMITTED BY THOSE LISTED ON FOLLOWING TABLE

Comment Submitted By:

Name	City
Abarr, Isabelle	Des Moines
Adams, Eva	Bloomfield
Adolphs, Carolyn	Traer
Alderman, Jane	Ankeny
Amlie, Sally	Humboldt
Andersen, Arlan	Dike
Andersen, Carol	Dike
Anderson, Elsie	Royal
Anderson, Gerald	Mason City
Anderson, Iola	Swea City
Anderson, Leonard	Royal
Anderson, Vicky	Kanawha
Andrews, Tamara	Johnston
Antrim, LaDonna	Stuart
Antrim, Ladonna	Stuart
Antrim, Teresa	Stuart
Antrin, Teresa	Stuart
Armstrong, Kenneth	Hampton
Armstrong, Phyllis	Hampton
Ault, Charlotte	Bayard
Ault, Louis	Bayard
Bailey, Helen	Floris
Baird, Jack	Red Oak
Baldwin, Jake	Hampton
Baldwin, Kristine	Hampton
Barker, Don	Iowa Falls
Barker, Elmira	Iowa Falls
Barrett, Clancy	Laurens
Barte, Jerry	Humboldt
Bartels, Edward	Lisbon
Bartels, Kim	Lisbon
Barth, Wendy	Cedar Rapids
Bauer, Donna	Audubon
Bauer, Jeanette	Ankeny
Bauer, Joan	Audubon
Baumhover, Doug	Lake View
Baumhover, Janet	Audubon
Baumhover, Leonard	Audubon
Baver, Bryle	Audubon
Bax, Clifford	Greenfield
Bax, Phyllis	Greenfield
Beach, Sue	Humboldt
Beach, Ted	Humboldt
Belzer, Tim	Albia
Benjamin, Vernon	Donnellson
Berge, James	Kensett
Berry, Doris	Sac City
Bewz, Jean	Gilmore City
Bigelow, Lester	Winterset
Bird, Ronda	Manly
Blackford, Richard	Dows

Name	City
Blaine, Linda	Moorhead
Bland, Ronald	Shellsburg
Blohm, Carolyn	Audubon
Blohm, Earl	Audubon
Blum, Joyce	Hampton
Blum, Lee	Hampton
Bode, Marjorie	Cedar Rapids
Boh, Ernie	Bloomfield
Bohi, Dee	Bloomfield
Bohi, Dee	Bloomfield
Bohi, Ernie	Bloomfield
Boinger, Carolyn	Ames
Bonner, Ted	Swaledale
Bosold, Patrick	Fairfield
Bowen, Jenn	Iowa City
Bowen, Kenneth	Winterset
Bowen, Patricia	Winterset
Bowersox, Rex	Bloomfield
Bowman, Jack	Bedford
Bowman, Mary	Bedford
Boyd, Britanni	Humboldt
Brada, Netha	Iowa Falls
Brada, Netha	Iowa Falls
Brada, Ron	Iowa Falls
Breining, Joan	Elk Horn
Brierly, Kathleen	Mason City
Brost, Meta	Clarksville
Brost, S	Clarksville
Brotherton, Betty	Wall Lake
Brown, Colleen	Livermore
Brown, Nate	Ames
Brown-Henning, Roberta	Jefferson
Brunk, Ronald	Eldora
Brush, Janel	Jefferson
Bryan, Katie	Des Moines
Buck, Anne	Ames
Buckhanna, John	Manly
Buettel, Arlo	Carroll
Bunger, Lisa	Humboldt
Bunger, Randy	Humboldt
Burnett, Madith	Des Moines
Busse, Brian	Humboldt
Butt, Kenneth	Ackley
Butt, Kevin	Ackley
Butt, Sandra	Ackley
Cahill, Dora	Webster City
Cahill, Robert	Webster City
Carlson, Candyce	Humboldt
Carlson, Jon	Thornton
Carlson, Laurie	Humboldt
Carmicheal, James	Red Oak

Comment Submitted By:

Name	City
Carmicheal, Phyllis	Red Oak
Carney, Kari	Des Moines
Carnoy, Kevin	Des Moines
Carr, Harold	Greenfield
Carroll, Charles	Iowa City
Carstens, Becky	Rockwell
Carstens, John	Rockwell
Carter, Marian	Stuart
Carter, Warren	Stuart
Casady, Kathleen	Davenport
Casady, Walter	Davenport
Casey, John	Des Moines
Cater, Jean	Emmetsburg
Charon, Bret	Humboldt
Christensen, Allen	Clarksville
Christensen, Douglas	Fontanelle
Christensen, Glen	Audubon
Christensen, Glen	Audubon
Christensen, Julie	Clarksville
Christensen, Lowene	Audubon
Ciesieski, William	Independence
Clark, Derrik	Humboldt
Clark, Jane	Clive
Clark, Norma	Allison
Clarke, Eugene	Stuart
Clarke, Pauline	Stuart
Clayton, Donald	Greenfield
Clayton, Norine	Greenfield
Coleman, Delores	Livermore
Conlon, Donald	Spencer
Conlon, Larue	Spencer,
Conrad, Lora	Keosauqua
Conrad, Raymond	Keosauqua
Cook, Danna	Bloomfield
Cook, Kevin	Bloomfield
Cowles, R.J.	Burlington
Crabb, Bob	Boone
Crabb, Brenda	Boone
Cregeen-Menke, Donna	Mitchellville
Crouch, Sari	Algona
Cunningham, Joseph	Ft Dodge
Cunningham, Sue	Ft Dodge
Daddow, Kirk	Ames
Dahl, Jennifer	Scranton
Dale, Barbara	Decorah
Daniels, David	Adair
Darr, Mary	Milton
Daugherty, Laverne	Cedar Rapids
Davis, Gary	Lorimar
Davis, George	Des Moines
Davis, Kathaleen	Red Oak

Name	City
Davis, Lawrence	Gilmore City
Davis, Maurine	Bayard
Davis, Ruth	Mason City
Davis, Steven	Moravia
Dawes, Gil	St Charles
Dawes, Inez	St Charles
DeBruin, Kayla	Des Moines
Deelor, Kathy	Mason City
Deist, Jerry	Audubon
Deist, Margie	Audubon
Demmer, Joan	Epworth
Demmer, Wayne	Epworth
Dempsey, Margaret	Ames
DenHartog, Jerry	Clear Lake
DenHartog, Tammy	Clear Lake
Dettmer, Dana	New Hampton
Diamond, Janette	Pleasant Hill
Djuren, Diane	Clear Lake
Dougherty, Mark	Webster City
Downes, Dan	Oxford
Doyle, Hope	Bayard
Doyle, Richard	Bayard
Dreier, Melvin	Dumont
Droste, Dennis	Waverly
Droste, Joann	Waverly
Droste, Sarah	Iowa Falls
Ducommun, Louis	Afton
Dunek, Deb	Solon
Dunn, Dirk	Villisca
Dyvig, Sara	Humboldt
Edmonson, Gary	Ottumwa
Eggers, Kathleen	Winterset
Elliott, Nella	New London
Emorx, Dean	Winterset
England, Jerrie	Earlham
Erhardt, Florence	Bloomfield
Erpelding, Michelle	Humboldt
Estes, Gary	Clear Lake
Eyerly, Jenny	Afton
Fallesen, Louie	Gilmore City
Fank, Mary	Mason City
Faust, Floyd	Stuart
Faust, Francis	Dexter
Faust, Rita	Stuart
Faust, Rita	Stuart
Faust, Viola	Dexter
Fee, Paul	Sioux City
Fee, Penny	Sioux City
Feld, Larry	Carroll
Ferguson, Michael	Des Moines
Fetters, Debbie	West Des Moines

Comment Submitted By:

Name	City
Field, Norma	Moorland
Findley, John	St Charles
Finley-Shea, Barbara	Lyle, MN
Finneau, John	Bloomfield
Fiscus, Harold	Bayard
Fiscus, Mary	Bayard
Fisher, Jack	Estherville
Fisher, James	Estherville
Fitzgerald, Linda	Cedar Falls
Fjeld, Lydia	Ames
Fjeld, Lydia	Ames
Fleming, Shalea	Winterset
Forgy, Julia	Dows
Foster, Margaux	Clear Lake
Fowler, James	Ottosen
Fowler, Jason	Ottosen
Fowler, Veronica	Ottosen
Frazier, Betty	Winterset
Frazier, Oliver	Winterset
Freeman, Debra	St Ansgar
Freerks, Darren	Aredale
Freerks, Jess	Aredale
Freerks, Randy	Aredale
Fromm, Herbert	Ames
Fromm, Katherine	Ames
Froyen, Len	Cedar Falls
Funk, Andy	Bloomfield
Gacke, Joe	Hudson, SD
Gacke, Linda	Hudson, SD
Galovich, Anna	Des Moines
Garlock, Elwood	Cedar Rapids
Garnes, Robert	Kensett
Gavin, Neil	Cascade
Gavin, Sherrie	Cascade
Geisinger, Ron	Linn Grove
Geisinger, Sonya	Linn Grove
Gerber, David	Lu Verne
Gerber, Kathryn	Lu Verne
Gerber, Kathryn	Lu Verne
Gidel, David	Rockwell City
Gieseke, Virginia	Des Moines
Gilbert, Liz	Iowa Falls
Gilbert, Mardelle	Audubon
Gilday, Edmund	Malcom
Gilson, Shirley	Bayard
Ginter, Lawrence	Rhodes
Girman, Patrick	Rolfe
Glosser, Judi	Bloomfield
Godson, Linda	Waterloo
Gohz, Neill	Grinnell
Grabill, Sam	Audubon

Name	City
Grabill, Shirley	Audubon
Graeser, Barb	Hampton
Graeser, Steven	Hampton
Gray, LaDonna	Buffalo Center
Greenward, Kerry	Dexter
Gresslin, Helen	Ackley
Griffin, Joni	Exira
Griffin, Loren	Exira
Griffin, Muriel	Indianola
Griffith, Melanie	Cedar Falls
Groen, Norma	Waverly
Grugan, Forrest	Brayton
Gunderson, Helen	Gilbert
Haglan-Lynch, Colleen	Prole
Hall, Phyllis	Gilmore City
Halling, Darryl	Milford
Halvorson, Charles	Calmar
Halvorson, Louann	Calmar
Hamand, Lyla	Nora Springs
Hamilton, Del	Latimer
Hamilton, Marilyn	Latimer
Hanawalt, Dave	Hampton
Hanawalt, Judy	Hampton
Hanke, Eleanor	Mitchellville
Hannon, Barbara	Bedford
Hansen, Dan	Whittemore
Hansen, David	Masonville
Hansen, Gloria	Brayton
Hansen, Gunnar	Masonville
Hansen, Herbert	Brayton
Hansen, Traci	Whittemore
Harden, Robert	Odebolt
Hardy, Nora	Mason City
Harklau, Dean	Humboldt
Harklau, Josh	Humboldt
Harklau, Judith	Humbolt
Harper, Dorothy	Dumont
Harper, Kenneth	Dumont
Harper, Nola	Dumont
Harrington, Denise	Nashua
Harrington, Kathryn	Nashua
Harrington, Louie	Nashua
Harrington, Robert	Nashua
Harrington, Robert	Nashua
Harrington, Shelly	Nashua
Harvey, Gerald	Redfield
Hauck, Kathy	Livermore
Hauck, Kathy	Humboldt
Hauck, Robert	Livermore
Hauck, Wally	Livermore
Haufe, Lillian	Clinton

Comment Submitted By:

Name	City
Hauk, Norma	Livermore
Hawthorne, Darrell	Lohrville
Hefty, Merrill	West Bend
Hegtvedt, Laurie	Mason City
Heikens-Herbster, Vivian	Milford
Heinzen, Tarah	Des Moines
Heins, Christine	Cedar Rapids
Heiter, Roger	Humboldt
Helm, Geneva	Van Meter
Henkel, Tracy	Rowley
Henrich, Robert	Carroll
Henry, Donna	Colo
Henry, Harrison	Colo
Hensley, Penny	Norwalk
Herfel, Bonnie	Ainsworth
Hesse, Marvin	Bloomfield
Hetz, Tyler	Des Moines
Hewitt, Arlo	Bloomfield
Hill, Dorla	Clarion
Hill, Myron	Clarion
Hinman, Dorothy	Mt Vernon
Hinrichsen, Earl	Moorhead
Hinrichsen, Marvin	Moorhead
Hirsch, Lena	Dexter
Host, Danielle	Pleasant Hill
Hotovec, Sheri	Livermore
Hovland, Dale	Thor
Howard, Michael	Kimballton
Humphrey, Evelyn	Milton
Humphrey, Wayne	Milton
Hundertmark, Cletis	Ottosen
Hundertmark, Paul	Ottosen
Hundertmark, Ruby	Ottosen
Huston, Barb	St Charles
Huston, Ruth	West Des Moines
Huston, Ruth	West Des Moines
Jackson, Bob	Bloomfield
Jackson, Bob	Bloomfield
Jackson, Elaine	Bedford
Jackson, Robert	Bedford
James, Arron	Dumont
Janecek, Dale	Washington
Jaray, Charles	Humboldt
Jass, Cheryl	Alden
Jass, James	Dows
Jass, Pauline	Dows
Jass, Robert	Alden
Jenkins, Andrew	Nevada
Jensen, Christine	Roland
Johnson, Connie	Exira
Johnson, Donald	Gilmore City

Name	City
Johnson, Hans	Brayton
Johnson, Kathleen	Murray
Johnson, Kathleen	Rolfe
Johnson, Kathleen	Rolfe
Johnson, Larry	Hanlontown
Johnson, Lois	Wall Lake
Johnson, Lynn	Exira
Johnson, Mark	Murray
Johnson, Naomi	Brayton
Johnson, Phillip	Rolfe
Johnson, Raymond	Murray
Johnson, Ruby	Humboldt
Johnson, Susan	Rolfe
Johnson, Victor	Wall Lake
Johnson, Victor	Wall Lake
Johnston, Betty	Murray
Jolliffe, Nancy	Gilmore City
Jolliffe, Thomas	Gilmore City
Jones, Cheryl	Bloomfield
Jones, Ervin	Winterset
Jones, Frank	Bloomfield
Jones, Leland	Bloomfield
Jones, Olive	Bloomfield
Kalbach, Amanda	Dexter
Kalbach, Barbara	Dexter
Kalbach, Heath	Stuart
Kalbach, Jim	Dexter
Kalbach, Leona	Dexter
Kalbach, Stacy	Des Moines
Kamper, Jacqueline	Ottosen
Kamper, Scott	Ottosen
Kellner, Austin	Nashua
Kelsey, Arliss	Iowa Falls
Kelsey, Kurt	Iowa Falls
Keneth, Bob	Fairbanks
Kenworthy, Mike	Runnells
Kenworthy, Shawna	Runnells
Kepple, Robert	Greene
Ketchun, Jaene	Algona
Kielkopf, Ann	Indianola
Kielkopf, Todd	Indianola
Kinnick, Edward	Bayard
Kinseth, Ramona	Ottosen
Kinseth, Richard	Ottosen
Kirk, Ann	Lorimar
Kirk, Ronald	Lorimar
Kittleson, Karen	Osage
Kittleson, Lowell	Osage
Klicker, Ida	Bloomfield
Klicker, Robert	Bloomfield
Koch, Meghan	Cedar Rapids

Comment Submitted By:

Name	City
Kohonst, Roger	Carroll
Kolbeck, Douglas	Fostoria
Koons, Susan	Des Moines
Kopaska, Dorothy	Dexter
Kornes, Laverne	Carroll
Kramer, Alice	Clarksville
Kramer, David	Clarksville
Krees, Charles	Independence
Kreiman, Keith	Bloomfield
Kreimeyer, Irene	Dougherty
Kreimeyer, Wallace	Dougherty
Kriemeyer, Gary	Sheffield
Kruger, Kerry	Nashua
Krukow, Yvonne	Sheffield
Kube, Carrie	Cedar Rapids
Kube, Darren	Cedar Rapids
Kucera, Ken	Riverside
Kuper, Annie	Iowa Falls
Kuper, Keith	Ackley
Kuper, Kenneth	Iowa Falls
Kuper, Marian	Ackley
Langerud, Ernest	Leland
Langerud, Sue	Leland
Lank, Ramona	Stuart
Lantz, L	Iowa City
Larsen, Donna	Exira
Larsen, Gary	Exira
Larsen, Jeff	State Center
Lawrence, Larry	Bloomfield
Lawrence, Sandi	Bloomfield
Lemkee, Sharon	Lu Verne
Lenfert, Carissa	Des Moines
Lentell, Sandra	Bedford
Lentell, Tom	Bedford
Lewis, Larry	Fontanelle
Leyda, Ione	Bloomfield
Leyda, Robert	Bloomfield
Little, Betty	Bedford
Little, Leland	Bedford
Lloyd, Dean	Coon Rapids
Lloyd, Evelyn	Coon Rapids
Lofte, Adrian	Ossian
Loss, Earl	LuVerne
Lounsbery, Roger	Ottosen
Lounsbery, Ronna	Ottosen
Louscher, Chris	Algona
Love, Chris	Marshalltown
Lown, Loren	Pleasant Hill
Ludwig, John	Ottosen
Ludwig, Vivian	Ottosen
Luhrs, Dale	Fontanelle

Name	City
Luhrs, Violet	Fontanelle
Lux, Ruth	Lidderdale
Malek, Crystal	Garner
Mallonee, Boyd	Red Oak
Mallonee, Della	Red Oak
Marvin, Charlotte	Humboldt
Marvin, Robert	Humboldt
Mauternach, George	Monticello
McBurney, Gladys	Humboldt
McBurney, Harold	Humboldt
McCullough	Humboldt
McCullough, Diane	Scranton
McCullough, Joe	Scranton
McDowell, Mark	Hampton
McFarland, Kerry	Stuart
McIntosh, Shirley	Dumont
Means, Carl	Cedar Rapids
Means, Curtis	Cedar Rapids
Means, Janice	Cedar Rapids
Menninger, John	Iowa City
Mensing, Lydia	Davenport
Merk, Leroy	Audubon
Merk, Sharlene	Audubon
Merulla, E	Cedar Rapids
Messerschmidt, Phyllis	Sheffield
Meyer, Loren	St Ansgar
Meyer, Margaret	St Ansgar
Meyer, Nancy	Iowa Falls
Miller, Barbara	Humboldt
Miller, Richard	Rowley
Miner, Cherie	Elliott
Moehlman, Constance	Iowa Falls
Moehlman, Mike	Iowa Falls
Moeller, Daryle	Elk Horn
Mohr, Mary	Fonda
Moore, Brian	New Hampton
Morris, Patricia	Waverly
Morrison, John	Humboldt
Mortensen, Nadine	Audubon
Mortensen, Richard	Audubon
Motley, Angela	Humboldt
Movadi, Sandra	Douds
Movadi, Shirali	Douds
Murphy, James	Mason City
Murray, Patrick	Carroll
Nahnsen, Mark	Callender
Najar, Ruth	Clear Lake
Navin-Tack, Sharyn	Denver
Nelson, Irvin	Dakota City
Nemzek, James	Humboldt
Nemzek, Mary	Humboldt

Comment Submitted By:

Name	City
Nielsen, Doris	Rolfe
Nielsen, John	Rolfe
Nissen, Lenise	Audubon
Nissen, Norman	Audubon
Nossaman, Gloria	Knoxville
O'Brien, Christy	Stuart
O'Brien, Don	Dexter
O'Brien, Jack	Stuart
O'Brien, Marilyn	Geneva
O'Brien, Nancy	Dexter
O'Brien, Scott	Geneva
O'Brien, Thelma	Stuart
O'Brien, Vince	Stuart
O'Brien, Vince	Stuart
O'Connell, Mike	Cedar Rapids
O'Connor, Kay	Cherokee
O'Donnell, Daniel	Rolfe
Olberg, F	Cedar Rapids
Olson, Jaclyn	Humboldt
O'Neill, Bob	Nashua
Owens, Jim	Lake City
Owens, Jim	Lake City
Owens, Jim	Lake City
Owens, Katie	Lake City
Paeper, Kurt	Humboldt
Paeper, Rosemary	Humboldt
Parks, Pauline	Sheffield
Parks, Wes	Sheffield
Parrett, Matt	Danville
Parrott, Deanne	Danville
Paulsen, Martin	Coon Rapids
Paulsen, Rosemary	Coon Rapids
Paup, Dennis	Carroll
Pederson, Marcheta	Fertile
Peltz, Colleen	Ringsted
Peltz, Randy	Ringsted
Perkins, Ed	Bedford
Perkins, Rhonda	Bedford
Peterson, Lashelle	Rolfe
Pezzetti, Gloria	Dexter
Pezzetti, Ronald	Dexter
Philby, Norman	Humboldt
Pickens, Norma	Bloomfield
Pickens, Rod	Bloomfield
Pieper, Dawn	Stuart
Poland, Teresa	Hampton
Poland, Todd	Hampton
Pomeroy, Melody	Pocahontas
Poplin, Toddie	Dumont
Powell, Ann	Casey
Powell, Cliff	Menlo

Name	City
Powell, Martin	Casey
Powell, Theresa	Menlo
Preston, Richard	Des Moines
Quail, Gordon	Spencer
Quail, Mary Ann	Spencer
Rahmani, Janet	Red Oak
Randay, Norma	Story City
Ranney, Cheryl,	Des Moines
Ratchford, Karen	Independence
Ratchford, Tom	Independence
Rauen, Robert	Lyle, MN
Reuscher, Doug	Nashua
Reuscher, Nancy	Nashua
Reynard, Juanita	Audubon
Riepe, Shirley	Red Oak
Rigby, Joyce	Laurens
Rigby, Richard	Laurens
Riggs, Sally	Des Moines
Riley, Deborah	Audubon
Riley, Robert	Audubon
Ringgenberg, Cyndi	Kelley
Ringgenberg, Phl	Kelley
Risolvato, Jennifer	West Des Moines
Roberts, Mary	Templeton
Roberts, Sam	Templeton
Rogers, Delbert	Bedford
Rogers, Helen	Bedford
Rollefson, Becky	Thornton
Romslo, Floyd	Royal
Romslo, Nancy	Royal
Rose, Becky	Humboldt
Rose, Phil	Humboldt
Rote, Geneva	Earlham
Royer, Barbara	Ames
Royer, Gary	Ames
Russell, Matthew	Des Moines
Ruyter, Farrell	Mason City
Ryan, Susan	Fairbank
Sackett, Jeff	Menlo
Sackett, Laurie	Menlo
Saunders, Howard	Independence
Savage, Becky	Winterset
Schaben, Jerry	Defiance
Schallock, Charles	St Ansgar
Scheinkonig, B	Carroll
Schettler, Norman	Carroll
Schiltz, Carol	Humboldt
Schmidt, Sheila	Malcom
Schneiderman, Sally	Bristow
Schoenfish, Ernest	Fort Dodge
Schoenfish, Fred	Ft Dodge

Comment Submitted By:

Name	City
Schoenfisch, Ted	Ft Dodge
Schon, Danny	Glidden
Schon, Dorothy	Glidden
Schon, Louis	Glidden
Schon, Randy	Glidden
Schroeter, Rodney	Atlantic
Schrupp, Richard	Waverly
Severn, Sandra	Red Oak
Shea, Cody	Lyle, MN
Shea, Keith	Lyle, MN
Shelgren, Birdie	Rolfe
Shelgren, John	Gilmore City
Shelgren, Virgil	Rolfe
Shepherd, Lisa	Nevada
Shepherd, Marianne	Humboldt
Sheridan, Tim	Everly
Shilby, Sharon	Humboldt
Shilling, Kevin	Greenfield
Shivvers, Isaac	Prole
Shivvers, Steve	Prole
Shoman, James	Rolfe
Short, Stacey	Dakota City
Shultice, Sandra	Blairstown
Sievers, Richard	Odebolt
Simon, Robert	Winterset
Simonsen, David	Bloomfield
Smock, Fred	Independence
Soden, Sheryl	Ames
Soukup, Sybil	Clear Lake
Spencer, Katheryn	Goldfield
Spencer, Lyld	Goldfield
Spicer, Keith	Sac City
Spurling, Charles	Livermore
Stanbrough, Merlyn	Allison
Standley, Patrick	Des Moines
Stanley, Linda	Des Moines
Steffen, John	Independence
Steffen, Sheila	Independence
Steger, Cletus	Balltown
Steger, Steve	Sherrill
Stevens, Scott	West Bend
Stidolph, Marla	Des Moines
Stockwell, Glenda	Bedford
Stockwell, Steven	Bedford
Stone, Kenneth	Rembrandt
Stone, Sue	Rembrandt
Stoner, Katherine	Afton
Stoner, Tommie	Afton
Strait, Juanita	Keosauqua
Strait, Stanley	Keosauqua
Strasser, Bradley	Des Moines

Name	City
Strasser, Sherry	Des Moines
Strautman, James	Carroll
Streit, Pansy	Livermore
Struckman, Sara	Des Moines
Stumpf, Mary Jane	Riverside
Stumpf, Terry	Riverside
Sturdevant, K	Iowa City
Sullivan, G E	Oskloosa
Sutherland, Brent	Winterset
Sutherland, Chad	Winterset
Sutherland, Marcia	Winterset
Swaim, Ruth	Bloomfield
Swanson, Donna	Humboldt
Swanson, Elmer	Humboldt
Swartz, Clarence	Orient
Swartz, Clarence	Orient
Swartz, Kris	Norway
Swartz, Tim	Norway
Swinton, Ruth	Nashua
Taylor, Alan	Mt Ayr
Taylor, Pamela	Marion
Taylor, Rebecca	Mt Ayr
Terwilliger, Roger	Humboldt
Terwilliger, Shirley	Livermore
Terwilliger, Tim	Humboldt
Thomas, Ginger	Marne
Thomas, Rex	Marne
Thompson, Allan	Kensett
Thompson, Allan	Kensett
Thompson, Linda	Humboldt
Thompson, Scott	Humboldt
Tigges, Anna	Carroll
Tigges, Laverne	Carroll
Tock, Thomas	Denver
Trauger, Marlys	Livermore
Troyna, Erika	Charles City
Troyna, Paul	Charles City
Tuma, Merlin	Pocahontas
Turner, Betty	Bedford
Uetz, Carla	Boone
Uetz, Robert	Boone
Underwood, Virginia	Mitchellville
Vance, Jack	Des Moines
VandenBosch, Mick	Mason City
VanDerHart, Godert	Waterloo
VanEkeren, Mildred	Pella
Vaudt, Chad	Dakota City
Vavrik, Julie	Clear Lake
Vavrik, Marv	Clear Lake
Veysey, Steve	Ames
Waddell, Lisa	Menlo

Comment Submitted By:

Name	City
Wagner, Dave	Whittemore
Wagoner, Rhonda	Winterset
Wambold, Dennis	Stuart
Wambold, John	Stuart
Warren, Betty	Iowa Falls
Warren, Betty	Iowa Falls
Warren, Hollis	Iowa Falls
Warren, Hollis	Iowa Falls
Wegner, Ferol	Des Moines
Wegner, Fredrick	Des Moines
Weis, June	Osage
Weis, Steve	Osage
Weisshaar, Alan	Creston
Weisshaar, Julie	Creston
Welsch, Mary	Marshalltown
Welsh, Elizabeth	Marshalltown
Welsh, Pat	Marshalltown
Welter, Alice	Ottosen
Welter, Chuck	Ottosen
Westcott, Dick	Mason City
Westcott, Rex	Thornton
Westegard, Sheila	Bloomfield
Westerlund, Dean	Humboldt
Westntire, Cody	Greenfield
Wetlaufer, Doug	Waterloo
Whelan, Elisabeth	Des Moines
Whenning, George	Jefferson
White, Robert	Solon
Wickwire, Evelyn	Aredale
Wickwire, Leland	Aredale
Wiese, Wesley	Ackley
Wilkinson, Wilton	Bloomfield
Williams, Shirley	Stuart
Willis, Anne	Des Moines
Willis, Phyllis	Thornton
Willis, Sarah	Thornton
Wilson, Marjorie	Livermore
Wilson, Robert	Jewell
Winkleblack, William	Rolfe
Winkler, Debra	Iowa Falls
Wirth, Danielle	Woodward
Witry, Charlotte	Waterloo
Witry, Harlan	Waterloo
Witt, Mary	Mason City
Wolfe, Gary	Exira
Wolfe, Gary	Exira
Wolfe, Martha	Scranton
Wolfe, Pam	Exira
Wolfe, Pam	Exira
Wunder, Gary	Thompson
Wytide, Michael	Cedar Rapids

Name	City
Yager, Linda	Bayard
Young, Jerry	Clear Lake
Young, Roxann	Clear Lake
Youngberg, Karen	Ames
Yunek, Betty	Lake City
Zeman, Barbara	Pocahontas
Zeman, Marvin	Rolfe
Zeman, Terry	Pocahontas
Zieman, Donald	Royal

Dear Mr. Bunton:

I support clean air and a vibrant livestock industry in this state. I support regulations that are based on the best scientific research available. I support the levels proposed in the Iowa legislature, but am opposed to the DNR's proposed 15 ppb hydrogen sulfide standard. Iowans have come out overwhelming in opposition to the proposed DNR standard by a 4:1 margin.

Air quality monitoring should be done at separated locations (including residences). They should not be placed up to 300 meters (984 feet) away because we need to find out if there are health impacts on neighbors from livestock operations. The standards should be set at levels protective of public health, not at levels designed to find violations by livestock operations.

Iowa Code section 459.207 requires that this hydrogen sulfide standard be set at a level commonly known to cause a material and verifiable adverse health effect. Exposure to 15 ppb over a one hour average is not commonly known to cause a material and verifiable adverse health effect. Even the University of Iowa - Iowa State University literature review recommendation does not claim to meet this legal standard.

House File 2523 and Senate File 2267 use the most recent recommendations available from the Agency for Toxic Substances and Disease Registry (ATSDR), a division of the U.S. Centers for Disease Control. The Centers for Disease Control are nationally recognized public health experts. Their recommendations contain a 30 times safety factor to protect even the most sensitive populations such as asthmatics, children and the elderly. I urge the adoption of the standards in HF 2523 and SF 2267 to protect our state's air quality and public health.

Sincerely,

SEE TABLE NEXT PAGE

Comment Submitted By:

Name	City
Adams, Doug	Humboldt
Adolphson, Marvin	Emerson
Allen, Vicki	Diagonal
Anderegg, Jim	Nora Springs
Anderson, Barry	Greenville
Anderson, Betty	Independence
Anderson, Jerry	West Liberty
Anderson, Steve	Beaman
Armstrong, Joe	Montezuma
Askew, John	Thurman
Baerg, Bill	Stanley
Baker, David	Lake Park
Baldner, Stewart	Dallas Center
Barnard, Randy	New Virginia
Barz, Jim	La Porte City
Bauer, Vance	Gowrie
Bausch, Mark	Latimer
Beard, Randy	Chariton
Beichley, Randy	Gladbrook
Bell, Lance	Weldon
Bennett, Kyle	Schaller
Benning, Kenneth	Fredericksburg
Berkland, Jeff	Cylinder
Bettin, Darwyn	Early
Bierman, Mary	Larrabee
Bierman, Tim	Larrabee
Bishop, Denise	Manchester
Bjelica, Roxann	Charles City
Bohner, Mark	Le Mars
Boland, Steven	Cedar Rapids
Bolton, Duane	Central City
Boote, Clarence	Orange City
Booth, Michael	New Hampton
Boyer, James	Ringsted
Brandt, David	Council Bluffs
BreDahl, Clark	Greenfield
Brennan, Marty	Emmetsburg
Brincks, Mary	Ossian
Brue, David	Buffalo Center
Brunia, Edee	Norwalk
Bunce, Donald	Tripoli
Bündt, Stephanie	Leon
Burton, Wayne	Battle Creek
Busch, Maurice	Allison
Buse, Ronald	Lake City
Buskohl, Mark	Grundy Center
Caggiano, Shirlee	Webster City
Cargo, Linda	Shannon City
Carlin, Brandon	Estherville
Carson, John	Woodburn
Chism, Dan	Emmetsburg

Name	City
Christensen, John	Blanchard
Christensen, Stacy	Estherville
Clark, Kenneth	Algona
Clause, Reginald	Jefferson
Clausen, Jeff	Carson
Clement, Kevin	Clarinda
Coleman, Dean	Humboldt
Collins, Mary	Livermore
Cook, Ray	Seymour
Cook, Richard	Worthington
Costello, Mark	Imogene
Cousins, Rob	DeWitt
Crago, Linda	Shannon City
Cronin, Mark	Marcus
Curtis, Sandra	Bettendorf
Dahl, Jason	Sloan
Dane, Jim	Iowa City
Dannen, Jim	Hampton
Danzer, Lisa	Carroll
Danzer, Marty	Carroll
Davis, Russ	Nemaha
DeBoom, James	Sutherland
Decker, John	Walker
Dejong, Carl	Chariton
Denker, Margaret	Manning
Deyoe, David	Nevada
Dixon, Teddy	Bloomfield
Dodds, Bradley	Danville
Donlon, Lisa	Monona
Dougherty, Brian	Waukon
Dreeszen, Dan	Spirit Lake
Dwann, Daniel	Osage
Earlywine, Matt	Mondamin
Eddy, Brian	Osceola
Edwards, Marvin	Victor
Ehlers, Angie	Walcott
Ehrhardt, Sandra	Monona
Elderkin, Gary	Winterset
Eldridge, Cory	State Center
Ellis, Jeff	Donnellson
Enerson, Arvin	Estherville
England, Keith	Hubbard
Entz, Eddy	Waterloo
Enyart, Paula	Postville
Escher, Dale	Murray
Espensen, Brian	West Branch
Evans, Joy	Bloomfield
Ewoldt, Robert	Blue Grass
Fara, Mike	Irwin
Fascher, Harvey	Coggon
Ferry, Brandt	Kirkman

Comment Submitted By:

Name	City
Fetters, Brad	Clio
Foell, Bill	Schaller
Fox, Karl	Elma
Francisco, Kim	Lucas
Frazer, Dean	Conrad
Fredrickson, John	Gowrie
Freese, Darrell	Steamboat Rock
Friederichs, Janet	Walcott
Friederichs, Roger	Walcott
Friedrichsen, Kent	Perry
Fuhrmeister, Eric	Coralville
Gardner, Stephen	Ottumwa
Gilbert, Kendra	Ionias
Greufe, Randy	Blairsburg
Griffin, Nancy	New Hampton
Grobe, Lynn	Oakland
Groot, Merlyn	Manson
Grove, Daniel	South English
Gunderson, Jay	Ringsted
Habben, Shane	Everly
Hagemann, Hubert	Carroll
Hahn, Lloyd	Sigourney
Haines, David	Exline
Haines, Mark	Plano
Harmon, David	Ankeny
Harris, Rita	Creston
Hassebrock, James	Roland
Hayes, Tom	Lamont
Hays, Robert	Malvern
Heemstra, Dennis	Primghar
Heidelberg, Gary	Coin
Heineman, Paul	Ogden
Heinrich, Joe	Maquoketa
Heintz, Mary	Marengo
Herink, Kevin	Clutier
Hill, Morey	Madrid
Hinnah, Jeffrey	Harper
Hobson, Dwight	Oakland
Hodnefield, Glen	Radcliffe
Hoeger, Joe	Hopkinton
Hoffman, Douglas	Clarence
Hofland, Jay	Sanborn
Hogan, Dominic	Monticello
Hoke, David	Mount Vernon
Hollatz, Jon	Garner
Holz, Robert	Jefferson
Hommel, Dave	Eldora
Hora, Andrew	Riverside
Howell, Glen	Columbus Jct
Hundley, Robert	Cedar Falls
Huntrods, Lee	Melbourne
Isaacson, Joyce	Carson

Name	City
Jackson, Andy	Bedford
Jackson, Tom	Rose Hill
Jacobson, Lawrence	Maxwell
Jamison, Frank	Columbus Jct
Jensen, Alan	Exira
Jensen, Mathias	Clarksville
Jepsen, Larry	Clinton
Jesse, Brad	LaPorte City
Johnson, Erwin	Charles City
Johnson, Keith	Rose Hill
Johnson, Leonard	Missouri Valley
Johnson, Maurice	Floyd
Johnson, Richard	Oskaloosa
Johnson, Roy	Gravety
Johnson, Verdell	Cleghorn
Johnston, Dallas	Lenox
Johnston, Ed	Diagonal
Jolly, David	Pleasantville
Jones, Duane	Bussey
Jones, John	St Charles
Kaiser, Julie	Milford
Keeler, Warren	Osceola
Kenyon, Ron	Whittemore
Kernen, Randolph	Glidden
Kerr, Richard	South English
Kessel, Leon	Lamoni
Kimberley, Richard	Maxwell
Kjos, Carlton	Decorah
Klein, Larry	Sigourney
Koch, Steve	Farley
Koehler, Wayne	Charles City
Kofoot, Larry	St Ansgar
Koop, Meinard	New Hartford
Kovarik, Ron	Calmar
Kramer, Allen	Algona
Kruger, Dennis	Wesley
Kucera, Mike	Garden Grove
Labertew, Jeff	Indianola
Lahr, Gary	Worthington
Langland, Steve	Spring Grove, MN
Lansink, Doug	Arthur
Larson, Lindsey	Jefferson
Larson, Nick	Randall
Leazer, Stever	Wilton
Lee, Steven	Polk City
Liddle, Randy	Plainfield
Looney, John	Wheatland
Ludley, Joe	Marshalltown
Ludwig, Jason	Elma
Lund, Eudene	Jewell
Lundgren, Cheryl	Essex
Maass, Bob	Ellsworth

Comment Submitted By:

Name	City
Maass, Leah	Ellsworth
Martin, Jim	Rolfe
Mass, Nathan	Malvern
Mattes, Stanley	Bedford
Matthey, Lu	Sergeant Bluff
Matthiesen, Dona	Wadena
Mattke, Richard	Sumner
Maynes, Melissa	Corning
McCall, Gary	Ute
McCall, Patricia	Castana
McCreary, James	Mount Ayr
McDanel, Jody	Centerville
McGrath, Beth	Lawton
McGrew, Stephen	Emerson
McHugh, Brandon	Dunlap
McKechnie, David	Atkins
McKnight, Jill	Afton
McKnight, Jim	Afton
McPherson, Dick	Indianola
Meade, Russell	Tiffin
Mehlert, John	Dysart
Mehmen, Stan	Plainfield
Meiburg, Leon	Rock Rapids
Meints, Dennis	Steamboat Rock
Meitner, Leland	St Ansgar
Messer, Carol	Yarmouth
Meyer, David	Sumner
Middleswart, Kevin	Indianola
Miller, Carol	Ankeny
Miller, Catherine	Sperry
Miller, Freddie	Council Bluffs
Miller, Richard	Algona
Moorhead, David	Moorhead
Mowrer, Bryan	Guthrie Center
Mowrer, Teresa	Guthrie Center
Mueller, Mark	Waverly
Murray, Terry	Storm Lake
Naig, Ronn	Cylinder
Nash, Brian	Derby
Nearmyer, Thad	Monroe
Needham, Darrell	Greene
Needham, Sherman	Greene
Neel, Jim	Manly
Neill, Claude	Clio
Nelsen, Matt	Everly
Nelson, Jay	Atlantic
Nelson, Mark	Clermont
Nelson, Randall	Irwin
Nelson, Wade	Spencer
Newlon, Nancy	Thurman
Nichols, Lillian	Bridgewater
Nielsen, Donald	Milford

Name	City
Nielsen, Ken	Harlan
Nielsen, Phyllis	Milford
Niess, Tim	Altoona
Oberbroeckling, Daron	Davenport
Oldham, Barbara	Eddyville
Overholtzer, John	Tingley
Pacha, Stephen	Birmingham
Palmer, Tim	Truro
Patterson, Chris	St Ansgar
Paustian, Ross	Walcott
Peck, Brian	Milford
Peck, Kristi	Milford
Peckham, Jeff	Lime Springs
Petersen, Don	Ankeny
Petersen, Gary	Maquoketa
Peterson, Wayne	Red Oak
Pickard, Brian	Melbourne
Pieper, Lee	Donnellson
Pippitt, Roger	Little Sioux
Pistek, Leonard	Britt
Podhajsky, Nick	Traer
Poldberg, Mindy	Panora
Popken, Todd	Ireton
Preston, Nicci	Clive
Prose, Barbara	Ottumwa
Raasch, Carol	Odebolt
Reedy, Ronald	Humboldt
Regan, Pat	Des Moines
Repp, Raymond	Perry
Rhoads, Corey	Grimes
Rhoads, Deb	Grimes
Rickels, Dan	Anamosa
Riesselman, Steven	Vail
Rinehart, Greg	Boone
Rinehart, Polly	Boone
Ritscher, Robert	Keystone
Roberts, Carl	Belmond
Rogers, Peg	Oxford
Rohrig, Kathy	Orient
Roorda, Richard	Prairie City
Rosol, Tonya	Nashua
Rubey, Clinton	Red Oak
Sabelka, Thomas	Lawer
Sage, Craig	Waterloo
Schachtner, George	Fonda
Schafbuch, Al	Dysart
Schlitter, Dawn	Waukon
Schmidt, John	Ocheyedan
Schmidt, Max	Elma
Schomaker, Barbara	Greenville
Schoonover, Howard	Garrison
Schuelke, Mark	Bedford

Comment Submitted By:

Name	City
Schuiteman, Matt	Sioux Center
Scott, Sybil	Kellogg
Secor, Jim	Chariton
Seil, Dave	Gowrie
Seipold, Bret	Hastings
Sexton, Michael	Rockwell City
Sievers, Jeffrey	Newell
Sjulin, Terrence	Hamburg
Skubal, Dave	Ainsworth
Smalley, Myron	Iowa City
Smith, Jim	Macksburg
Smith, John	Manchester
Sorensen, Doug	Audubon
Spain, Stephanie	Castalia
Spain, Vince	Castalia
Stallman, Craig	Williamsburg
Stender, Kevin	Massena
Stewart, Sean	Lehigh
Stine, Tom	Adel
Stock, Mark	Waukon
Stoops, Linda	Shenandoah
Strauel, Bob	Jesup
Streeper, Michael	Onslow
Stribe, Russell	Manning
Struthers, Dave	Collins
Sullivan, Vincent	Corning
Sutton, Chris	Slater
Svendsen, Douglas	Marshalltown
Swales, Rodney	Strawberry Point
Swann, Daniel	Osage
Swanson, Larry	Manchester
Swenka, Steve	Tiffin
Sykerman, Marsha	Sibley
Taeger, Jo Ann	Sperry
Tangie, Albert	Albia
Taylor, Steve	Hartley
Tellier, Kevin	Humboldt
Thomas, William	Lamoni
Thompson, Steven	Van Horne
Tindle, Jeff	Montezuma
Townsend, Edwin	Bedford
Townsley, Annette	Letts
Turnis, Mike	Bernard
Tweeten, Lon	Woolstock
Valvick, Arlyn	Swea City
Van Ervelde, Louise	Brooklyn
Van Regenmorter, Chad	Inwood
Van Zante, Norman	Pella
Vanderlinden, Marilyn	Centerville
Ver Steeg, Mike	Inwood
Verhulst, Michael	Ottumwa
Vermeer, Steve	Boyden

Name	City
Vorthmann, Brandon	Council Bluffs
Vos, Bonnie	Oskaloosa
Vos, Donald	Oskaloosa
Vosika, Mike	Pocahontas
Walker, Rex	Lamoni
Walters, Charles	Eldora
Walters, Steven	Indianola
Ward, Steve	Bloomfield
Watts, Lenny	Dows
Weber, Brian	Buckingham
Welch, William	Winthrop
Welter, Mark	Hopkinton
Westphalen, Delbert	Atlantic
Westrum, Bryon	Boone
Wheeler, Troy	Lorimor
Whitman, David	Grand Mound
Wical, Joyce	Grundy Center
Wicks, J Wayne	Decorah
Wiemers, Randy	Spencer
Wikstrom, Dwight	Hornick
Wikstrom, Mary	Hornick
Wilcox, Mark	Marcus
Wilson, Ann	Delhi
Winterhof, Dan	Aurelia
Wolfe, Jesse	Emmetsburg
Wolfswinkel, Kevin	Sibley
Wonderlich, Nancy	Waterville
Wood, Ron	West Des Moines
Woodley, Gary	Clario
Wright, James	Russell
Wynia, Chris	Sibley
Young, Jon	Elliott
Zhorne, Gary	Havelock
Zylstra, Roger	Kellogg

Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, Iowa 50322

Re: Air Quality Standard for Hydrogen Sulfide

Dear Mr. Bunton:

I would like to provide public comments for the proposed air quality standard for hydrogen sulfide.

It is very important to base all regulations on science. It is also important that any **air quality standards follow the guidelines that are presented by federal government data, such as Agency for Toxic Substances and Disease Registry (ATSDR)**. This data is used as a screening tool to protect the most sensitive individuals.

The monitoring of hydrogen sulfide conducted by the Iowa DNR at various distances from the farming operation has shown that animal production can create short-term exposure of hydrogen sulfide. The ATSDR indicates that short-term exposure of hydrogen sulfide causes a health risk at 70 ppb. **Based on the federal ATSDR level, I don't believe that the department is able to justify 15 ppb as the public health level.**

Lastly, since state law requires enforcement at the separated distance, **I encourage the Iowa DNR to monitor at the neighbors residence.** Iowa farmers have worked diligently to minimize emissions to protect our own families. As a result of being a heavily regulated business, we have maintained separation distances from neighbors as required by state law.

Sincerely,

SEE TABLE NEXT PAGE

Comment Submitted By:

Name	City
Albrecht, Gary	Iowa Falls
Alexander, Pat	Diagonal
Asmus, David	Alden
Bassett, Gary	
Bear, Mary Lou	Ackely
Beermann, Paul	Sutherland
Bierman, Tim	Larrabee
Biggs, Nick	Oakville
Blanton, Sally	West Des Moines
Bosma, Curt	Ocheyedan
Brandt, Howard	Hampton
Brozik, Dan	Garner
Burke, Rick	Murray
Burnham, Mark	Pierson
Carey, Jody	Iowa Falls
Carlson, Greg	Stratford
Caspers, Jon	Swaledale
Chalupa, Jonathan	Wellman
Christensen, Tim	Royal
Christian, Kay	Woodward
Clark, Steven	Hartley
Clausen, Paul	Fort Dodge
Cressler, Wilmer	Sac City
Crouch, Raymond	Afton
Crouse, Dale	Dana
Danielson, Dick	Humboldt
Debois, Brad	Iowa Falls
Deist, LaVerne	Audubon
Derby, Tory	
Determan, Susan	Early
Determan, Susan	Early
Determan, William	Early
Driscoll, Harry	Mechanicsville
Driscoll, Jean	Mechanicsville
Driscoll, Thomas	Mechanicsville
Driscoll, Tom	Mechanicsville
Duappert, Gerald	Lynnville
Dykstra, Rodney	Everly
Ehlers, Brian	Walcott
Ehlers, Debbie	Marathon
Ehlers, Ken	Marathon
Ehlers, Mike	Marathon
Elliott, Charles	Spencer
Elliott, Lisa	Spencer
Faaborg, Tyler	Radcliffe
Fahnländer, Kevin	Royal
Fahnländer, Robert	Royal
Fehr, Anita	Whittemore
Fehr, Byron	Whittemore
Fischer, Gary	Columbus Jct
Flink, Bill	Odebolt

Name	City
Fry, Ed	Afton
Gelder, Keith	Jewell
Goeken, Connie	Everly
Goeken, John	Everly
Gooding, Douglas	Mt Ayr
Graham, Sue	Quimby
Greiner, Adam	Wellman
Greiner, Claude	Wellman
Greiner, Mary	Kalona
Gross, Jerry	Greenville
Gunderson, Jay	Ringsted
Hadley, Dean	Des Moines
Hall, Mike	Wall Lake
Hansen, Lonnie	Peterson
Harmon, Quinton	Everly
Harmsen, Chris	Wellman
Hendrickson, Sandra	LeRoy, MN
Hill, Eric	Ames
Hilleman, Randy	State Center
Hogan, Dominic	Monticello
Hosfield, Randy	Diagonal
Jacobsen, Brad	Wall Lake
Johnson, Jeff	Dunkerton
Juza, James	Spencer
Kapka, Lyle	Clarion
Kerns, Steven	Clearfield
Kezes, Scott	Iowa Falls
Kitzman, Brian	Williams
Klommhuis, Kim	Clearfield
Knoblob, Roger	Sioux City
Knott, Steve	Zearing
Kraft, Scott	Riceville
Kroeger, Jayne	Spencer
Kroeger, Kenneth	Hartley
Kroeger, Kim	Spencer
Kruger, Dan	Wesley
Kruger, Dennis	Wesley
Kruse, Keith	Everly
Lane, Michael	Dows
Lantow, Harold	Fredericksburg
Lantow, Karen	Fredericksburg
Larson, Dean	Clarion
Link, Denis	Mt Ayr
Livingwood, Melissa	Waterloo
Longbine, Jason	Ainsworth
Manning, Craig	Royal
McCarty, Eugene	Hartley
Mercer, Richard	Mt Ayr
Meyers, Jeff	Waverly
Mulford, Julie	Iowa Falls
Nelson, Jim	Afton

Comment Submitted By:

Name	City
Nelson, Mike	Shannon City
Nielsen, Donald	Milford
Nieman, Duane	Earlville
Orwig, Ervin	Ruthven
Parsons, Tonna	Webb
Patten, Carol	Webb
Patten, Douglas	Webb
Paysen, Jason	Wall Lake
Pingel, Myron	Aurelia
Poppe, Nancy	Ionia
Rasmussen, Kevin	Goldfield
Reding, Christine	Cylinder
Reding, Steve	Cylinder
Reinke, Ryan	Dows
Rice, Bret	Des Moines
Ridgeway, Derek	Ireton
Roelfs, Holly	Ackely
Roelfs, Megan	Ackely
Roelfs, Richard	Ackley
Roghair, Alice	Royal
Roghair, Randy	Royal
Ruff, Daryl	Westgate
Schiefelbon, Greg	Elmore
Schmdit, Joel	Audubon
Schueneman, Arthur	Spencer
Schueneman, Kay	Spencer
Severson, Connie	Nemaha
Sievers, Brian	Storm Lake
Simpson, Kevin	Roland
Slezer, Butch	Aurelia
Spencer, Tori	Audubon
Spieker, James	Spencer
Springer, Fred	Cherokee
Stadhander, Bruce	Meservey
Steere, Todd	Greene
Stout, Rob	Washington
Thorne, Steve	Hartley
Trei, Gary	Sibley
Troyer, Keith	Kalona
Vogel, Todd	Hartley
Wahlert, Lynn	West Des Moines
Wahlert, Timothy	Audubon
Walker, Jack	
Wall, Thomas	Iowa City
Weber, Richard	Marcus
Weitz, Charles	Whittemore
Wickman, Jeff	Mallard
Widmeir, Curt	Decatur
Williams, Scott	Lake City
Wilson, Connie	
Wischmeyer, Jim	Webb

Name	City
Wolfe, Donald	Maynard
Young, Tamra	Wellman

Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, Iowa 50322

Re: Hydrogen Sulfide Air Quality Rule

Dear Mr. Bunton:

Recently I became aware that DNR is proceeding with an air quality rule for hydrogen sulfide and its possible impacts on agricultural livestock production. I would like to express my concern for these proposed rules.

How is the department determining what the health effect level is? Where did the 15 parts per billion come from? I don't believe that the Joint University Report can be used any longer as the justification for air quality rules and as the basis for a standard. Iowa State University has spoken out publicly against the process and conclusions of this report. It was not based on good science.

According to the ATSDR, 70 parts per billion is the screening level for hydrogen sulfide to do more investigation. In effect, an accurate health effect level would be higher than 70 parts per billion. So why is the department proposing 15 parts per billion when the health effect level is potentially more than four times higher than that?

The required study needs to be completed, data needs to be collected to see if there is a health threat, and then and only then, should the department take action to develop regulations. These are serious concerns that I believe the DNR should honestly rethink and consider changing before they propose another rulemaking. This rule is rushed and unfounded. We need our rules and regulations to be based on sound science, not on emotional politics.

Sincerely,

SEE TABLE NEXT PAGE

Comment Submitted By:

Name	City
Black, Norine	Ames
Bolbemo, Lou	Fremont
Carrie, Paul	Bronson
Doorenbos, Leland	Boyden
Doughtry, Brian	Waukon
Ehrhardt, Sandra	Monona
Haller, Dan	Manning
Hamblin, Dean	Jesup
Hooper, Dominic	Monticello
Johnson, Dwight	Andover
Kasper, Pat	Oxford
Miller, Walter	Reinbeck
Milligan, Craig	Indianola
Nelich, William	Winthrop
Olsen, Steve	Thompson
Priest, John	Diagonal
Renner, Tom	Ventura
Ryan, Tim	Oxford
Schmidt, Timothy	Hawarden
Slach, Ray	West Branch
Smith, Steven	Mason City
Spencer, Brian	West Branch
Vittetoe, Jerome	Washington
Welter, Mark	Hopkinton
Zhone, Gary	Havelock

Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, Iowa 50322

Re: Hydrogen Sulfide

Dear Mr. Bunton:

I would like to provide public comment for the proposed air quality standard for Hydrogen Sulfide.

I understand this rule is only setting a standard or a level for the air quality study. Even so, I am not convinced that it will stop there. To set a number at this stage of the policy making process is only setting the ag industry up for this to be THE number later down the road.

I don't believe that the department is able to justify 15 ppb as the level at which the public's health is at risk. If we look at health standards from other national agencies (ASTDA, OSHA, NIOSH, AIHA, AGCIH, and NAS) for Hydrogen Sulfide, we see that their standards and levels established to protect public health range from 70 ppb to 20,000 ppb.

Why does the Iowa DNR think they know better than these national agencies about protecting public health? These rules are supposed to be based on health, not nuisance. A hydrogen sulfide standard should not be used as a backdoor approach to solving odor as a social, annoyance issue.

Sincerely,

SEE TABLE NEXT PAGE

Comment Submitted By:

Name	City
Black, Norine	Ames
Carrie, Paul	Bronson
Christenson, James	Waukee
Dennison, Dan	Knoxville
Ehrhardt, Sandra	Monona
Fisher, Robert	Kalona
Grief, James	Monticello
Harlin, Thomas	Manning
Howell, Dean	Jesup
Hoye, Joe	Villisca
Hoye, Wallace	Villisca
Kasper, Glenn	Oxford
Koehler, Ted	Monticello
Kruger, Dennis	Wesley
Leazer, Steve	Wilton
Loutsch, Mark	LeMars
Miller, Walter	Reinbeck
Milligan, Craig	Indianola
Priest, John	Diagonal
Ryan, Tim	Oxford
Slach, Ray	West Branch
Streeper, Mike	Onslow
Vittetoe, Jerome	Washington
Zhorne, Gary	Havelock

Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, Iowa 50322
FAX (515) 242-5094
bryan.bunton@dnr.state.ia.us

Re: Air Quality Rule for Hydrogen Sulfide

Dear Mr. Bunton:

I am writing to you in response to proposed rule for hydrogen sulfide. I am a farmer and wish to continue to make my living through agriculture. I believe the proposed air quality rule for Hydrogen Sulfide is too restrictive and I would like to see the DNR reconsider their proposal.

Specifically, I am disappointed that the DNR has proceeded to develop the rule that is the same as the nullified one from last year. The legislature said that the 15 ppb standard was too restrictive, why would you come back with the same number? I would like to see the DNR reconsider their proposal and to develop a Hydrogen Sulfide standard after the field study is completed and only if the field study determines there is a health impact from CAFOs.

Sincerely,

SEE TABLE NEXT PAGE

Comment Submitted By:

Name	City
Bartenhagen, Joan	Muscatine
Black, Norine	Ames
Carrie, Paul	Bronson
Ehrhardt, Sandra	Monona
Ewoldt, Sally	Davenport
Fisher, Gladys	Kalona
Hamblin, Dean	Jesup
Harlin, Thomas	Manning
Harris, Marge	Thornton
Leazer, Steve	Wilton
Martz, Earl	Blue Grass
Martz, Phyllis	Blue Grass
McKnight, James	Afton
Merrill, Richard	Fort Dodge
Miller, Walter	Reinbeck
Milligan, Craig	Indianola
Priest, John	Diagonal
Ryan, Tim	Oxford
Schroeder, Gary	Bryant
Slach, Ray	West Branch
Vittetoe, Jerome	Washington
Zhorne, Gary	Havelock

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

Dear Mr. Bunton:

This letter is in response to the DNR's proposed hydrogen sulfide rule for livestock production. Pork producers are committed to clean air and a quality environment. We support rules and regulations that are based on science. I do not support the 15 ppb as it is not based on science.

As a livestock producer I would like to voice my comments on the proposed air quality standards of 15 ppb for hydrogen sulfide. I am aware that the IDNR established air quality standards last year for hydrogen sulfide and the Iowa Legislature nullified the rule. Now you are proposing to use the exact hydrogen sulfide standard that the legislature nullified, but even worse one that is not based on science or even the IUS/U of I literature review.

Livestock production is very important to the State of Iowa and I am disappointed in your actions to unfairly regulate agriculture. I strongly encourage you to rethink your actions and conduct a scientific study, consider the information and determine if a public health impact is in fact an issue for Iowa and Iowa agriculture.

Sincerely,

SEE TABLE NEXT PAGE

Comment Submitted By:

Name	City
Dierks, Nancy	Northwood
Donahue, Cassie	Osage
Havel, Troy	Osage
Kraft, Mary	Riceville
Lowman, Sharon	Charles City
O'Brien, Jacqueline	Waucoma
Olson, Patricia	St Ansgar
Wilde, Dave	Osage

From: Jane Shuttleworth <lakesidejane@yahoo.com>
To: Bryan Bunton <Bryan.Bunton@dnr.state.ia.us>
Date: 1/6/04 1:17PM
Subject: Re: air rules

Thanks for your answer.

My concern is if ambient monitoring is conducted, how can the source of emissions be identified? Second, is it common practice for the public, and not industry, to pay for the monitoring? Shouldn't this be included as cost of doing business?

Thank you,

Jane

Bryan Bunton <Bryan.Bunton@dnr.state.ia.us> wrote:

Hi Jane,

The DNR is monitoring air emissions of hydrogen sulfide and ammonia. Ambient monitoring will be conducted at residences or public use areas (parks, etc.) near to animal feeding operations. No monitoring will be conducted on site at confinements. Funding has been provided by the Iowa Legislature through the state infrastructure fund for the purchase of monitoring equipment (\$500,000).

Please feel free to contact me if you have any additional questions or concerns.

Date: Tue, 6 Jan 2004 09:29:58 -0800 (PST)

From: Jane Shuttleworth

Subject: air rules

To: bryan.bunton@dnr.state.ia

Dear Bryan,

I understand you can answer questions about the new air emissions rules. Will the air monitoring be done on site at confinements, or will it be ambient? Who is to pay for monitoring?

Thank you,

Jane Shuttleworth

Bryan Bunton
Environmental Specialist
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road Suite 1
Urbandale, IA 50322
515-281-6729
515-242-5094 fax

Do you Yahoo!?

Yahoo! Hotjobs: Enter the "Signing Bonus" Sweepstakes

From: <KA0Y@aol.com>
To: <sean.fitzsimmons@dnr.state.ia.us>, <bryan.bunton@dnr.state.ia.us>
Date: 1/18/04 1:00PM
Subject: (no subject)

January 20, 2004

Comments on Health Effects Value and Health Effects Standard

Summary

I looked over the rulemaking on establishing animal feeding operations on health effects value and health effects standards in the proposal by the DNR for the Environmental Protection Commission on levels for hydrogen sulfide. The proposed level of 15 parts per billion (ppb) averaged over 1-hour are a sound level. These values are only applicable to animal feeding operations and should not effect any other operations.

They look well planned and very good to me

The only thing that I don't like about it is it will discriminate against rural homeowners that have to live next to small animal feeding operations (AFO)(1250head) or less because the no separation distances rule. It will let them build 250 ft or less next to your house weather you like it or not This hog building will not fall under the new proposed rule (HEV/HES) for health hazard of gases because of the no minimum distance requirement.

Now the DNR can't do anything about (AFO) small animal feeding operations being close to someone's house because the Iowa State Legislature needs to change the minimum distance on separation distances for anything under 500au or 1250 head to 1320 ft or ¼ mile from someone's else's home.

Then this new rule will take all animal feeding operations in, also for the (HEV/HES) proposal of a level of 15 parts per billion of hydrogen sulfide gas averaged over 1-hour and will assure that we can be safe by any (AFO) animal feeding operations

This will be the only way it would be fair to all and not discriminate against a few.

Now let think what I am asking to be done, very little really.

Just change the separation distances from small (AFO) animal feeding operations to 1320 ft or ¼ mile from the nearest residences and this will take care of lot problems for the DNR, local supervisors and let people live in peace.

I sit here thinking that I would rather live a ½ mile from a large (AFO) (4000head) animal feeding operations, than next to a 1250 head 200 ft from your front door.

At least you could breath when the wind was not from that direction.

The one that is 200 ft from your front door will always have the hydrogen sulfide smell, noise and insects 75% of the time or more You can't even have your windows open at night, be out in the yard working without the hydrogen sulfide smell, noise and insects.

Also property values will plummet downward for that property

Kenneth Kucera
2986 160th ST
Riverside, Iowa 52327
319-648-5803



IOWA CITIZENS FOR COMMUNITY IMPROVEMENT

January 31st, 2004

Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

RE: Proposed Hydrogen Sulfide Health Effects Standard

Dear Mr. Bunton,

Iowa Citizens for Community Improvement members have been pushing for clean air rules for factory farms for more than three years. We strongly support the Department of Natural Resources' effort to adopt a hydrogen sulfide health effects standard of 15 parts per billion at a separated location based on the recommendation in the joint University of Iowa/Iowa State University CAFO air quality study.

However, there are aspects of the draft rules that are weak and must be changed to ensure that the rule actually protects public health and the environment. Our proposed changes include:

- I. Including an ammonia standard of 150 ppb and an odor standard of 7:1 dilution rate at a separated location in the proposed rules. These standards were recommended in the joint University of Iowa/Iowa State University CAFO air quality study. The department's decision to back away from the recommendations in the joint University study and not include an ammonia and odor standard is sending the message to rural residents that the Iowa DNR answers to special-interest pressure rather than working for the health and well-being of Iowans. Commissioned by Governor Vilsack, the joint University study was compiled by 27 state university scientists and peer-reviewed by eight national and international experts. The study's ammonia standard recommendation was based on ATSDR's chronic standard and is remaining unchanged by ATSDR. The joint University study is current, sound, and based on the best science available. All of the recommendations in the joint University study must be followed, not just a select few.
- II. Purchasing portable air monitors to: 1) Verify the amount of gases estimated to be given off from a particular factory farm 2) Respond to citizen complaints 3) And make sure that best management practices are actually reducing gas emissions. Currently, the DNR only has a handful of permanent monitoring devices. The DNR needs to purchase and use technology that will enable them to properly check and regulate factory farms across the state.
- III. Removing the monitoring exemptions for certain factory farms from the rules because they would unnecessarily restrict DNR's monitoring. One of the exemptions is for factory farms that did not meet legal separation distance requirements when they were constructed. The DNR should not want to tie its hands from protecting residents living near large-scale factory farms, especially if that factory farm was built illegally. The DNR needs to enforce the separation distances, not write exemptions.

In addition, residents who had a factory farm built near them before separation distances were established should also have their health protected. The DNR must take out these monitoring exemptions in the proposed rules. All people should have the right to breathe clean air. The DNR needs to protect everyone's health from factory farm air pollution, not just a portion.

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FEB 04 2004

- IV. Removing the seven day grace period from the proposed rules that would allow factory farms to have seven days of air quality violations each year that would not count as violations. There is no reason to give exemptions for polluting our air or threatening public health. Each violation must be counted.
- V. Drafting immediately an enforcement component to the rules. Iowa Code requires the DNR to begin taking enforcement action against factory farms no sooner than December 1, 2004. However, the DNR needs to be taking the proper steps to move forward to draft rules for enforcement action against factory farms now, so that enforcement action can begin on December 1, 2004. Factory farms have been polluting Iowa's air and posing a health risk for far too long. There is absolutely no reason to make Iowans wait any longer for relief. The department must immediately begin drafting an enforcement action component that would allow the department to issue violations against factory farms and force them to comply with the department's air quality standards.

The health and environmental risks associated with factory farm air pollution is epidemic. Unfortunately, factory farms have been invading our local communities because our state has not yet put air quality standards on the book.

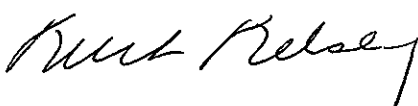
On November 19th, 2003 the American Public Health Association adopted a resolution urging for federal, state, and local government to impose a precautionary moratorium on new CAFOs. One of the main reasons identified was serious respiratory problems found among children, neighboring residents, and CAFO workers.

Factory farm proponents claim that there is not adequate science to back up the need for clean air regulations. However, under the Precautionary principle, which provides a guide to environmental policy and has been used in several different places, the burden is placed "on the proponents of a potentially harmful activity to prove that their actions do not harm human health or the environment," according to the Iowa CAFO Air Quality Study.

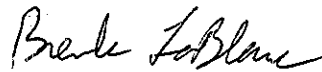
Iowa CCI members praise the DNR for moving forward again on clean air rules for factory farms. However, we call on the DNR to protect our air and Iowans from these toxic fumes by making these recommended changes. For the above stated reasons, we believe these rules must be changed accordingly and request revision.

Respectfully submitted,

Kurt Kelsey
Iowa CCI Board President



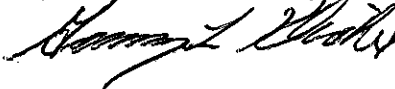
Brenda LaBlanc
Iowa CCI Board Treasurer





Marilyn Andersen
Iowa CCI Board Member



Garry Klicker
Iowa CCI Board Member



Vern Tigges
Iowa CCI Board Vice-President

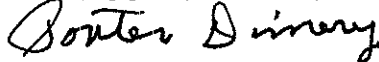



Betty Little
Iowa CCI Board Member



Ron Tigner
Iowa CCI Board Member

Porter Dimery
Iowa CCI Board Member



Christy O'Brien
Iowa CCI Board Secretary




Ramona Chavez-Lopez
Iowa CCI Board Member



Bev Rutter
Iowa CCI Board Member

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FEB 04 2004

February 3, 2004

Mr Brian Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road
Urbandale, IA 50322

Re: Air Quality Standards

Dear Mr. Bunton

I am having a hard time figuring out why a branch of our government insists on working so diligently to stifle an industry that is vital to the state's economic future. The industry I am referring to is the livestock industry. It has come to my attention that the DNR is seeking public comment regarding proposed air quality standards and I felt compelled to submit comments.

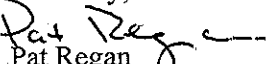
First of all, I definitely support clean air and a quality environment. I also support rules and regulations based on scientific fact, not those driven by fear or a vocal minority. The livestock industry in this state has made remarkable progress addressing environmental issues over the last twenty years or so. It makes no sense to burden them with standards and regulations that are not consistent with the latest research and/or endorsed by nationally recognized agencies such as the U.S. Center for Disease Control.

Secondly, the 15 parts per billion standard for hydrogen sulfide you are suggesting is the same standard nullified by the Iowa Legislature last year. The legislature sent the DNR a clear signal last year that your agencies efforts exceeded the legislative intent they had established. They wanted a field study, not standards and regulations. Nothing has changed in this arena. This is a colossal waste of your agencies time and of our tax money. On top of that, you are knowingly sending a false signal to Iowans that there is inherent danger in air that reaches the 15 ppb standard. There is no scientific evidence to support any danger to health at that level.

Lastly, this standard unfairly targets livestock operations. Are we only concerned by potential health effects if the air we breathe carries hydrogen sulfide from livestock operations? Does hydrogen sulfide emitted by other industries not have the same chemical makeup of that emitted by livestock operations? If, and when, any standard is established after a thorough, consistent scientific study it should apply to all hydrogen sulfide emissions and it should protect all Iowans. To proceed with standards based on faulty science is bad enough, to target one component of economic activity in our state makes no sense at all.

We hear all the time about the inefficiencies of government. With the current budget situation in our state, it is time our state agencies did the right thing. Complete the field study using sound science consistent with legislative intent and then make the decision concerning additional regulation in an area that is already over regulated.

Sincerely,


Pat Regan
4016 46th Street
Des Moines, Iowa

Cc: Governor Tom Vilsak
Senator Jack Holveck
Representative Janet Petersen

RECEIVED

FEB 03 2004

①

RECEIVED

FEB 1 1904

Dear Bryan

Feb 1. 04

Read your letter in the Dec 27.03
editorial page in the spokesman and
here are a few of my thoughts.

Farmed all my life with pigs ^{41 yrs} from
to finish till 1998 when they made us go out
of the pig farming no price get bigger
or quit, sure I know pigs smell but
at that time it was also money, where
now its stink & odor, I live out in the
country less than 1 mile N. of 3 Big
boy houses and some days when the air
& wind are just right I wish Mr
Parostian was here if it dont smell
it stinks & if he dont agree I think
he should see a doctor or it wont be
long he will need an undertaker.

I feel sorry for the next generation, we
dont know the results for a long time
till its too late.

Look at what they told us with weed
killer atex 4 U they said it was
safe, you could drink it look
what they tell us now, at that time
over

D

We used lbs ^{per acre} now we use oz. just think of the power it must have today.

Now to the new world, computers, TV, DVD, VCR, cell phones & all the modern Elec gadgets, Is this good for us?

Why do the nurses that takes you X ray always step behind some thing to protect her self from the rays?

How about the people that work & sit by desks of computers & has a key or in places where there is high voltage

Look what happened to that High way patrol man that had that radar gun in between his legs, maybe just 1 out of how many, Is this going to be a problem later who knows,

now what we eat is it good for us or not, for instant Pork, Pig is born dont hardly get to blow its mother good & is on its own, all fast growing intake plus lines above all the waste that he & the other Pig produce & inhales all the air & fumes that come from the pit, sure there are fans that take the air out but he must get it

Things to think about
in the future for some
It's to note ③

first hand, sure he has a short life 5
mos. or less (now?) we eat this meat,
we haul this waste in the field,
we breath this air, we drink the water
that has come through this waste
that has been spread on the earth
surface, we plant crops on the land
then we harvest & then we feed it to
the live stock again.

(Now on the weather) Do we get more rain
then years back? we use to get 70 Bu corn
20 Bu Beans per acre years back now
its 170 or more ^{corn} Beans 50 to 60 still same
acres, but more P.P. per acre also we have
more people on earth, just think of all the
extra water that is drank, Baths, flushes,
car washes, clothes just to name a few.

Plus ^{all} livestock & wild life (JUST
DEER)

Feb 2 more comments today It is
snowing east N. east wind & I have a
big Farrow House (Paris fords) just 2
miles east of our place. It sure stinks
here, also have 3 other big hog set ups.
1 W. 1 SW 1 N. all in the 2 to 5 mile area

(4)

I just cant win no matter where the wind comes in the yard.

I went to the assessor to have my taxes lowered & he told me they cant lower mine that they would have to do it for to many other people + it de valued my farm, no one would like to live out here.

I thought I would give you info on the hard slopes in rural country.

Very concerned

citizen

Al Hadlick

PS

would like to hear
a comment from
you

From: "Bill 3rd & Mary Fortin" <btfm3rd@danvilletelco.net>
To: <bryan.bunton@dnr.state.ia.us>
Date: 2/5/04 7:23AM
Subject: Air Quality Rule for Hydrogen Sulfide

Bryan Bunton

Iowa Department of Natural Resources

Air Quality Bureau

7900 Hickman Road, Suite 1

Urbandale, Iowa 50322

FAX (515) 242-5094

bryan.bunton@dnr.state.ia.us

Re: Air Quality Rule for Hydrogen Sulfide

Dear Mr. Bunton:

I am writing to you in response to proposed rule for hydrogen sulfide. I am a farmer from Des Moines County. I have farmed for over 30 years and wish to continue to make my living through agriculture. I have 2 sons who would like to farm and are farming today. However, one is applying for a job off the farm as I write this. Why? Because they need livestock to make farming a full-time job and the climate of livestock has changed in the last several years and not for the best! 2 years ago when the other son tried to get a permit to build hog houses, one woman who lived 3/4 mile away tearfully spoke at a board of health meeting about all the things she had heard about hog houses, etc.! My wife worked in a confinement farrowing house while she carried our son. Myself and children have worked and been around confinement hog houses since 1970 when we built our first. None of us have health problems. I was in a study with Iowa City to study the effects in the 1980's and was dropped out - did not have problems. I was told then that generally only people who smoked had problems. I'm for a clean, healthy environment! There is so much junk information out there pushed by ICC, etc. They make false statements then can not or will not back them up and all to get people upset and worried. We need GOOD information then we can set some standards. I believe the proposed air quality rule for Hydrogen Sulfide is too restrictive and I would like to see the DNR reconsider their proposal.

I would like to see the DNR reconsider their proposal and to develop a Hydrogen Sulfide standard after the field study is completed and only if the field study determines there is a health impact from CAFOs.

Sincerely,

Bill Fortin 3rd

12278 Des Moines Henry Ave , Danville, Iowa 52623-9019 (319)392-4775

"btmf3rd@danvilletelco.net"

From: "Northeast Iowa Specialty Meats" <neism@iowa-natural-meats.com>
To: "bryan bunton" <bryan.bunton@dnr.state.ia.us>
Date: 2/6/04 12:16PM
Subject: Clean Air Rules

BRYAN;

Just a quick note to let you know I support stronger air quality standards such as the ones you are currently taking public comments on. I would also support a hydrogen sulfide and odor standard.

We are farmers in Benton county Iowa. My wife and I both grew up on farms and have been in that occupation for over 30 years. We have come to the conclusion that the odors and fumes from these confinement buildings are NOT a agricultural smell. We know the difference. More than once, we have had

these operators dump thousands of gallons of liquid hog manure 250 feet from our home, directly upwind. They make no effort to knife it in or disc it in after application. They show no regard for other peoples health.

We have put up with it long enough. Something has to be done. We feel we have a right to breath clean air

like everyone else. Please don't back away from doing what is right for our community and neighborhood. This is one issue that is not going away.

Jim and Elly Fink
C-V Farm
5378 29th. Ave Vinton Ia. 52349
319-443-2117

Daron Oberbroeckling



21962 120th Ave. • Davenport, IA 52804

February 03, 2004

Bryan Bunton
Iowa DNR Air Quality Bureau
7900 Hickman Road
Urbandale, IA 50322

Dear Mr. Bunton,

I am writing you in regards to the hydrogen sulfide emission standard that is being proposed by the DNR. I feel that this standard of 15 ppb is inappropriate based on the research that has been done. I personally do not raise livestock but am a third generation grain farmer in eastern Iowa and I argue this proposal for several reasons

One reason is that too much other research says that this number is too low. I feel that more research needs to be done until the ppb number is established to be harmful. Another reason is that this standard is not being proposed to any other businesses other than livestock farmers. If 15 ppb is harmful to our health than shouldn't all businesses be held to this same standard.

I would also like to comment that livestock production is a very important and vital enterprise to the state of Iowa and every effort should be made to make decisions that are firmly based on scientific research.

Thank you for taking the time to read this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Daron Oberbroeckling".

Daron Oberbroeckling

RECEIVED

FEB 06 2004

From: "mdanzer" <mdanzer@win-4-u.net>
To: <bryan.bunton@dnr.state.ia.us>
Date: 2/8/04 10:53PM
Subject: Hydrogen sulfide

Dear Mr. Bunton:

I am writing to you in response to proposed rule for hydrogen sulfide. I am a farmer from Carroll county. I have farmed for 21 years and wish to continue to make my living through agriculture. I believe the proposed air quality rule for Hydrogen Sulfide is too restrictive and I would like to see the DNR reconsider their proposal.

Specifically, I am disappointed that the DNR has proceeded to develop the rule that is the same as the nullified one from last year. The legislature said that the 15 ppb standard was too restrictive, why would you come back with the same number? I would like to see the DNR reconsider their proposal and to develop a Hydrogen Sulfide standard after the field study is completed and only if the field study determines there is a health impact from CAFOs.

Sincerely,
Marty Danzer
22663 Quail Ave
Carroll, Iowa 51401

From: "Lisa Danzer" <ldanzer@templeofthai.com>
To: <bryan.bunton@dnr.state.ia.us>
Date: 2/9/04 11:43AM
Subject: hydrogen sulfide

2/9/04

Mr. Bunton:

I am writing to you in response to proposed rule for hydrogen sulfide. I am a farmer from Carroll county. I have farmed with my husband for 15 years and wish to continue to make my living through agriculture. I believe the proposed air quality rule for Hydrogen Sulfide is too restrictive and I would like to see the DNR reconsider their proposal. Specifically, I am disappointed that the DNR has proceeded to develop the rule that is the same as the nullified one from last year. The legislature said that the 15 ppb standard was too restrictive, why would you come back with the same number? I would like to see the DNR reconsider their proposal and to develop a Hydrogen Sulfide standard after the field study is completed and only if the field study determines there is a health impact from CAFOs.

Sincerely,
Lisa Danzer
22663 Quail Ave.
Carroll, Iowa 51401

From: "Eric & Lisa" <lstick@infocom.com>
To: <bryan.bunton@dnr.state.ia.us>
Date: 2/9/04 6:32PM
Subject: Questions on AFO Air Quality standard

Bryan,

I've been surfing the internet for info on improving air quality near AFOs and found your sites. I find them very impressive. I saw a statement that there are 28 states with hydrogen sulfide and ammonia air quality standards. Do you have a list of those states that you could e-mail or snail-mail to me?

I live in Indiana and, last year, a dairy (that does not meet the Indiana definition of an AFO, but certainly does emit heavy odors) was constructed less than 1000 feet due west of my home. I also am a farmer and raise beef cattle on 120 acres.

I noticed your proposed monitoring sites only included two cases where the AFO was located somewhat west of the monitoring site. I propose that monitoring sites due east of the emission sources represent the worst case scenario for the home-owner (such as my situation) and that effort should be taken to monitor the air within a determined distance due east of the emission sources.

Do you have any idea if Indiana DNR would be performing similar studies? I'm checking their website next.

Thank you,

Eric Stickdorn
Brookstone Terrace Farm
PO Box 63
New Lisbon, IN 47366

765-478-5649

February 6, 2004

Bryan Bunton
Iowa DNR, Air Quality Bureau
7900 Hickman Road
Urbandale, IA 50322

RE: Air quality standards

I'm very upset about the proposed 15 ppb for Hydrogen Sulfide that the DNR and the EPC are supporting. Even after the Iowa Legislators nullified the earlier attempt last year, here you go again. But there is one significant difference between the two, only farmers are being targeted. The DNR felt the wrath of the public when everyone had to abide by unreasonable rules. It is unfair for the DNR to target farmers just because it feels it can politically get by with it. This standard is twice the CDC's strict levels.

I also have problems with where the measurements are being taken. Instead of being at the neighbor's residence, I have seen the stations on the property line right next to a cattle confinement operation (Sioux Center). That is NOT what the legislature had in their bill. I have been told so by Rep. Ralph Klemme, who wrote the bill if you need clarification. Let's get all the data collected at separated locations, not at property lines or 300 meters away from residences, but as close as possible to neighbor's houses before jumping to conclusions.

Finally, farmers live and work on the farms where these animal housing units are located. We want clean air and water for our families and neighbors. Sure a few days of the year there may be some bad smells while the manure is being turned into natural fertilizer. But that is part of nature's process that has been going on since the start of time. It is not a public health issue that demands the DNR's attention, but only an annoyance that should be talked about between neighbors.

I urge you to reconsider your position on this matter. The production of livestock is an important value-added industry in Iowa.

Sincerely,



MARK BOHNER
Box 55
Le Mars, Iowa 51031-0055

RECEIVED

FEB 09 2004

Wayne Geadelmann - 3030 Meadow Road, Adel, IA 50003
E-mail: wgeadelman@aol.com - Phone & Fax: 515-993-5147

February 9, 2004

Mr. Bryan Bunton
Iowa DNR Air Quality Bureau
7900 Hickman Road
Urbandale, IA 50322

Dear Mr. Bunton:

I am writing you to protest the proposed air quality standard for hydrogen sulfide at 15 parts per billion emitted from any livestock operation.

The reasons for my objection to the proposed standard are as follows;

The standard was apparently set based upon a study by the University of Iowa which used inaccurate assumptions and to my knowledge has not been repeated to verify the results.

The standards are proposed for livestock operations only. What about other industries located in or near large population areas?

I think it will be very difficult to measure hydrogen sulfide and other air contaminants due to differences in air movement, temperature and atmospheric conditions. Therefore it would be unfair to livestock producers to be punished if they briefly violated the standard.

I live on an acreage in the country and one or two days a year we will get odor from a neighboring farmer who is spreading hog manure. This usually goes away in one or two hours.

I am not a farmer and I am very interested in protecting our environment but I get concerned when the industry which is Iowa's most important industry is subject to undue regulation.

Thank you in advance for considering my comments.

Sincerely,


Wayne H. Geadelmann

RECEIVED
FEB 10 2004

February 8, 2004

Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
Hickman Road, Suite 1
Urbandale, IA 50322

Re: Air Quality Rule for Hydrogen Sulfide

Dear Mr. Bunton:

I am writing to express my concern over the proposed rule for Hydrogen Sulfide (15ppb) that is currently only being proposed for Confined Animal Feeding Operations (CAFO).

The Iowa State/University of Iowa Report is grossly outdated and should not be used to support the new rule. If we are to look at other national agencies, Agency for Toxic Substances for example, they have set the standard at a much higher level. Why should the livestock industry in Iowa be held accountable for an exceedingly lower number? What makes that number fair for them and not for other business or entities? To me, the 15ppb standard does not appear to be justifiable or defensible on your behalf.

I would recommend that you continue your field studies at separated distances, close to the nearest residence, business, school, etc., not at the CAFO building site. To place the monitors closer than necessary will only falsely skew the data and will not provide the public a true measurement to which our citizens are exposed to under normal circumstances.

I trust you will hear from many Iowa residents during the comment period, but I caution you to complete your field study first before enacting a standard that has yet to be proven justifiable to an industry that is so vital to Iowa's economy.

Sincerely,



Terry Seehusen
1803 Elmhurst Avenue
Humboldt, IA 50548

RECEIVED

FEB 10 2004

From: "Carolyn Bolinger" <carolyn_bolinger@hotmail.com>
To: <bryan.bunton@dnr.state.ia.us>
Date: 2/11/04 12:23PM
Subject: clean air

I want to encourage you to support the toughest clean-air standards possible, at least as strong as those proposed by the two largest state universities. In Ames, we have several cases of Lou Gehrig disease, which is highly unusual for this size population. I know unusual things like this are also happening around the state. Come on! If we demand it, businesses will conform, as they have with other OSHA and federal regulations. This would be a good way to encourage people to visit Iowa; I'm tired of reading in the NY Times about our waters like India's, our air quality some of the worst. ...

Carolyn Bolinger, Ames

Optimize your Internet experience to the max with the new MSN Premium Internet Software. <http://click.atdmt.com/AVE/go/onm00200359ave/direct/01/>

From: "Russ Kurth" <rkurth@pionet.net>
To: <bryan.bunton@dnr.state.ia.us>
Date: 2/11/04 9:05PM
Subject: Air Quality Rules for Hydrogen Sulfide

Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road
Urbandale, Iowa

The DNR should not establish a standard of 15 ppb of Hydrogen Sulfide for the purpose of the study because 15ppb over a one-hour average is not a correct health effect level. I would support setting a health effect level for hydrogen sulfide that is based on the best scientific information available. The proposed level of 15ppb cannot be substantiated in research and is not endorsed by nationally recognized agencies. The Center for Disease Control (CDC), has screening levels established at levels higher than what DNR staff has proposed.

I recommend that the DNR study this matter further before setting up a health standard. If the health stand is set to low it could have serious effects on the economy of this state. I do farm next to a large dairy farm. I am concerned about the environment and air around the confinement but I do feel that any standard set should be based on the best information available.

Russell Kurth
2487 280th Street
Logan, Iowa

2/11/04

Bryan Buntan
DNR

RE Air Quality Rule for Hydrogen Sulfide

I am a 55 yr. old farmer from Scott Co. Ia. Sustained low prices and disease have forced me to quit raising hogs after 34 yrs in the business. It takes more volume to make enough money to cover ever increasing health care costs, property taxes et

I sincerely hope the DNR reconsiders its backward approach to limit the growth of pork production in Ia by adopting ridiculously low levels of hydrogen sulfide.

Through the years hogs have paid alot of property taxes to help educate our young people. Now Gov. Vilsack has proposed more new taxes to generate more money for education. It seems to me we have over educated the people that came up with the 15 ppb level of H₂S in the air. What scientist came up with this figure - the very same level the legislature rejected last yr. as too restrictive.

It's stupid regulations like these that keep forcing young people off the farm only to take good jobs away from other young well educated people.

Richard Holmquist
Walcott, Ia.

February 10, 2004

Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

Re: Hydrogen Sulfide Air Quality Rule

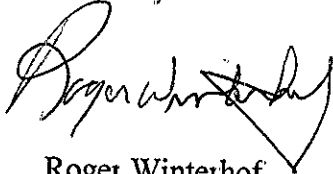
Dear Mr. Bunton

I would like to comment on the proposed air quality standard for hydrogen sulfide. This area is of concern to me due to my involvement in agribusiness and production agriculture, and also as a resident of rural Iowa.

This rule making setting a level of 15ppb for hydrogen sulfide seems premature. First we need the results of the required scientific study as to the level at which hydrogen sulfide poses a measurable health risk. It is not prudent to rely on a Joint University Report that utilized processes and formed conclusions that have now been questioned by Iowa State University. Using a level of 15ppb establishes in the public's mind an expectation of danger even though no scientific study has validated that number, and other federal agencies utilize numbers far in excess of that level.

Livestock producers will support efforts to protect public health by maintaining air quality consistent with a science-based determination of health risks. Please reconsider implementing at this time the proposed Rule, allowing the legislatively required study to first establish the actual level at which Hydrogen Sulfide poses a public health risk.

Sincerely



Roger Winterhof
210 Deere Road
Hubbard, IA 50122

RECEIVED
FEB 11 2004

Thomas J. Vincent

313 South Tenth Street • Perry, Iowa 50220
Telephone: (515) 465-3684
Cellular: (515) 238-0839
Fax: (515) 465-2390
E-mail: perrypork@surfmk.com

February 10, 2004

Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, Iowa 50322

Re: Hydrogen Sulfide Air Quality Rule

Dear Mr. Bunton:

I understand that the DNR is proceeding with an air quality rule for hydrogen sulfide and its possible impacts on agricultural livestock production. I am a farmer from Dallas County and I would like to express my concern for these proposed rules.

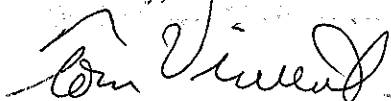
The 15 parts per billion threshold as proposed by the DNR is a completely unfounded number. I don't believe that the Joint University Report should be used any longer as the justification for air quality rules and as the basis for a standard. Iowa State University has spoken out publicly against the process and conclusions of this report. It was not based on good science.

According to the ATSDR, 70 parts per billion is the screening level for hydrogen sulfide to do more investigation. In effect, an accurate health effect level would be higher than 70 parts per billion. Why is the DNR proposing a 15 parts per billion standard when the health effect level is potentially more than four times higher than that?

Past history of the DNR departing from the law established by the Legislature and signed by the Governor, particularly when it set about measuring air quality at livestock facilities rather than at separated distances as the law requires reflects a bias and lack of respect for the law. This 15 ppb threshold as proposed by the DNR is another example of that bias.

The required study needs to be completed, data needs to be collected to see if there is a health threat, and then and only then, should the department take action to develop regulations. These are serious concerns that I believe the DNR should honestly rethink and consider changing before they propose another rulemaking. This rule is rushed and unfounded. We need our rules and regulations to be based on sound science, not on emotional politics.

Sincerely,



Tom Vincent

RECEIVED

FEB 11 2004

From: "Dan" <dan@wmtel.net>
To: <bryan.bunton@dnr.state.ia.us>
Date: 2/13/04 10:39AM
Subject: CAFO air quality regulataions

Dear Mr. Bunton:

I am concerned about the soundness of the proposed air quality regulations. You may not like confined livestock operations, but that is no reason to single them out for standards that do not have to be met in any other industry. The monitoring for health risks needs to be done at the legal separation distances, not on the sites. Sticking your nose in a gas tank is not a healthy proposition either, but that does not make gas illegal.

Dan Cramer

From: "Adolphson" <adolphson@redoak.heartland.net>
To: <bryan.bunton@dnr.state.ia.us>
Date: 2/14/04 8:49PM
Subject: Air quality standards

Dear Byron

I believe more study needs to be done before standards can be set for hydrogen sulfide. The proposed standard of 15 ppm is not reasonable.

Marvin Adolphson
1099 230th
Emerson, Iowa 51533
adolphson@redoak.heartland.net

From: "Paul and Janet Hunter" <pjahunter@hotmail.com>
To: <bryan.bunton@dnr.state.ia.us>
Date: 2/15/04 9:27PM
Subject: Air quality rule for hydrogen sulfide

Mr. Bunton;

I would like to provide public comment for the proposed air quality standard for hydrogen sulfide

I don't believe the Department is able to justify 15 ppb as the level at which the public's health is at risk. If we look at standards from other national agencies (ASTDA, OSHA, NIOSH, AIHA, AGCIH, AND NAS) for hydrogen sulfide we see that their standards and levels used to protect the public's health range from 70 ppb to 20,000 ppb

Why does the Iowa DNR think that they know better than these national agencies about protecting public health? These rules are supposed to be based on health, not nuisance. A standard should not be used as a backdoor approach to solving odor as a social, annoyance issue

Sincerely,

Paul Hunter
700 College Drive
Decorah, IA 52101

From: Danielle Wirth <ehorizon@netins.net>
To: <bryan.bunton@dnr.state.ia.us>
Date: 2/17/04 8:34PM
Subject: air quality standards

Mr. Bunton:

I would like my comments included in any written record that will involve air quality standards involving CAFO's (confined animal feeding operations)

Air quality standards for factory farms are essential. The joint University of Iowa and Iowa State University report released in February of 2002 states that hydrogen sulfide and ammonia have been measured near factory farms in concentrations that could be harmful to humans. I attended a conference in Nov. 2001 where Gov. Vilsack explained that he placed responsibility upon ISU and the U. of Iowa to research this issue. The state universities conducted research that is reliable, valid and holds to high scientific standards.

A decision by the DNR not to include ammonia standard of 150 ppb and odor standard of 7:1 dilution rate in the rules is not acceptable based on quality of life and health issues. A limit on ammonia and noxious odors from factory farms is a reasonable standard to enforce. Foul air quality could become a matter of unfair "taking" of a resource, especially if the factory farm was added to the area, rather than having other homes and businesses grow up around a CAFO.

I support the air standards proposed by the DNR of 15 parts per billion of hydrogen sulfide for a one hour average. This is a reasonable health provision that, once enforced, will help protect public health.

I remain concerned with the makeup of the technical advisory groups (TAG) that DNR plans on assembling. I strongly encourage the DNR to make sure that the TAGs are not stacked with industry representatives-- health experts must be included!

Backing away from the joint University air quality study by not including an ammonia and odor standard will send the wrong message to all Iowans that their state answers to special interest pressure-- not the health and well-being of Iowans. We can not back away from the study simply because the industry is grappling for excuses to avoid standards. With the drive to recruit new businesses, especially high tech companies, to the State of Iowa, it seems like an act of foolishness to allow further deterioration of Iowa's natural resource infrastructure.

Also, the DNR must purchase portable air monitors to: 1) Verify the amount of gases estimated to be given off from a particular factory farm 2) Respond to citizen complaints 3) And make sure that best management practices are actually reducing the gas emissions. Currently, the DNR only has a handful of permanent monitoring devices. The DNR needs to purchase and use technology that will enable them to properly check and regulate factory farms.

In the DNR's proposal, the DNR will not monitor at:

Residences near factory farms that were built after the factory farm

Residences near factory farms if the factory farm was built before there were separation distance requirements

Residences near factory farms that built illegally too close (without meeting the legal separation distance requirements) -- The DNR needs to enforce legal separation distance requirements, NOT exempt factory farms from regulations!

The DNR must take out the monitoring exemptions! The DNR needs to protect everyone's health from factory farm air pollution. All people should have the right to breathe clean air.

I object to the DNR's "7 day grace period" that factory farms would get each year. This proposal would allow factory farms to have 7 days of air quality violations that would not count. There is no reason to give exemptions for polluting air and threatening health. Each violation should be counted.

Please contact me should you have further questions or wish to comment on this communication.

Danielle Wirth, Ph.D.
Rural Route
Woodward, IA 50276

2/17/04

Testimony for the D.N.R. re CAFO Air Quality

How many times are we going to have hearings on CAFO's? The Governor doesn't want to solve the problem. The Republican controlled legislature does not want to solve our CAFO problems. The D.N.R. has hearings to let people blow off steam and does not get to the root of the problem. Even Iowa State University's Dean of Agriculture has shown her true colors by turning her back on rural Iowa. Apparently she is not a rural resident.

In Iowa the problem with CAFO's is that we have some of the weakest laws in the United States. If your property line is 2ft from your home people can legally spread manure 2ft from your house, 2ft from your well and 2ft from your livestock. Until our Governor, the Republican legislature and the D.N.R. support some reasonable distances in our state hogs will continue to be dumped here from Canada, Minnesota, South Dakota, Illinois and Nebraska. Young people will continue to leave the state so they don't have to worry about air with septic tank stench, polluted water, or having their property values cut in half.

One of the reasons the number of pork producers has declined from 130,000 twenty years ago to 7000 - 8000 today is because of diseases that corporate America is spreading around the state of Iowa. With the chickenization of the hog industry by corporate America, many producers couldn't get their sows bred, or all their litters died in the farrowing house, and they just gave up the fight and quit. Today at almost every veterinarian conference they finally have the guts to have speakers warning livestock producers about siting CAFO's too close together and risking airborne diseases spreading to other hogs. Many of us knew that years ago. For example corporate America builds farrowing units 2 or 3 miles away from other hogs in both Missouri and Canada.

I am President of the Palo Alto Co. Pork Producers. I have 52 buildings within a 3-mile radius of my farm. 9 months out of a year we smell hog manure 6 days out of a month, we can live with that. However some fall seasons -after harvest- you can smell this stench every day for up to a month. We are the only county in the state that has a good neighbor policy; no one can build a CAFO within a half-mile of any residence without the owner's permission. Thanks to our supervisors: in 1997 they took the time to sit down and negotiate for hours with all the major players in the hog industry. Something that the Governor, the Republicans or Jeff Volk could do. They could do this without the help of the commodity groups or the

Farm Bureau. Sometimes I think those organizations believe that individuals should have no property rights. If you would take a survey of my neighbors I think they would tell you that they can live with a ½ mile distance, but that a one - mile set back would be justified. However I am also sure they would be adamant about spreading manure at least ½ mile away from their homes – unless permission has been granted.

Iowa is a big state with 99 counties, and with all the ethanol plants being built, we may need more livestock producers, big and small, but you just can't put all these CAFO's in 20 counties or on top of a neighbor. Thanks to the corporate hog lots in our county all but one has honored the county's ½ mile policy. These are the kind of regulations that will promote the livestock industry in Iowa and not tear it apart. Palo Alto county is proof that these requirements have not hurt the number of hogs raised in our county. In the 1970's & 1980's, 250,000 hogs were raised in Palo Alto County, today it is over 1 million. We will destroy the livestock industry by not setting reasonable distances and being producer friendly.

The D.N.R. should start being pro-active and stop using every excuse in the book and start treating the Iowa citizens with Love, Respect and Esteem or they can sit back and let the justice system do their job. Corporations can buy the executive branch and the legislative branch but they haven't always controlled the judicial branch.

1. I support the air standards by the DNR of 15 parts per billion of Hydrogen Sulfide.
2. I object to Jeff Vonk's decision not to include ammonia standards and odor standards.
3. I also object to the DNR backing away from the joint universities air quality studies. This was sound science, now turned into a political agenda by corporate America.

The problem is simple to solve if someone really cared. Right now you are not protecting the people or our livestock producers. Someone needs to sit down with the players, not hold more hearings.

L.J. Solberg,
3780 510th Avenue,
Cylinder, Iowa. 50528

February 13, 04

Bryan Bunton
Iowa Dept of Natural Resources
Air Quality Bureau
7900 Dickman Rd. Suite 1
Urbandale Ia 50322

Dear Mr. Bunton:

Recently I became aware that DNR is proceeding with an air quality rule for hydrogen sulfide and its possible impacts on agricultural livestock production. I am a farmer from Woodbury County, and I would like to express my concern for these proposed rules.

The proposed 15-ppb health effects level is not based on the best available information and should be abandoned. The Joint University Report recommendation is outdated and based on flawed assumptions.

I support the rule requiring all measurements be taken within 300 ft. of the separated location. If the field study shows there is a health impact from AFOs at a separated location, I would support the development of air quality rules as long as they are in compliance with statutory law and developed with the support of sound science.

Sincerely,

Lu Matthey

Lu Matthey
2563 Barker Ave.
Cat. Bluff. Ia 51054

RECEIVED

FEB 17 2004

From: "Brandon McHugh" <redcows@longlines.com>
To: "Bryan Bunton" <bryan.bunton@dnr.state.ia.us>
Date: 2/18/04 8:48AM
Subject: Hydrogen Sulfide Rule

Dear Mr. Bunton,

This letter is in response to the DNR's proposed rule for Hydrogen Sulfide. I am a beginning farmer in Harrison Co. and I am here to tell you that farming is getting to be hard enough dealing with high equipment costs and low commodity prices. We don't need to have to deal with a ridiculous rule that has no science behind it. The national agencies standards and levels for Hydrogen Sulfide range from 70ppb to 20,000 ppb. Why would the DNR want to set this their standard so low? This rule would be totally against agriculture in the state of Iowa and that is what we are all about.

Please reconsider this proposal. I have always had an appreciation for the DNR. I have ordered trees from the State Nursery for the past two years for windbreaks without applying for cost share from the state.

I am afraid that this is one more thing that will be too hard on the farmers and drive more to quit farming as it becomes too difficult to do, due to regulations. Take a look at how many farmers there are under the age of 45. I am only 30. Please don't make life harder on us and our bottom line. It is hard enough. Sure we have some good markets sometimes but that is when the weather is dry like it has been, then we have a lack of crop to sell.

As a farmer I have a great deal of respect for natural resources and most respectable farmers do. Please help us out here. We need to work together. Thanks for listening.

Sincerely,

Brandon McHugh
3305 155th St
Dunlap, IA 51529
(712) 647-3002

From: "Leonard" <leremi@rconnect.com>
To: <bryan.bunton@dnr.state.ia.us>
Date: 2/18/04 6:42PM
Subject: commenting on air quality standards for animal confinement operations

Sir:

My name is Leonard Sinnwell. I am a fourth generation farmer (on both sides) in Chickasaw and Floyd Counties here in Iowa. My Farm Bureau Spokesman's issue this week encouraged me to write as to my opinion. You might be surprised of the fact that I am strongly encouraging you to stand your (DNR's) ground on the 15ppb hydrogen sulfide standard. I probably am more the silent majority opinion that never takes the time to write. But, this seems too important. I think we all know that Iowa's legislature had the confinement regs. shoved down the majority (Republican) party's throat by the overwhelming feeling by the voter here in Iowa. That something had to be done to control these large confinement setups. The Hog Industry has been very good at "infiltrating" the Farm Bureau county committees with their people who have large animal confinement buildings. So, besides their lobbying, they get a second seat at the discussion table via the Farm Bureau. However, most people that I know who belong to the Farm Bureau anymore belong just so they can get access to health and other insurances. Not because they believe in the direction they are being driven by large animal corporate interests. They don't know what their \$40/yr membership fee buys them for political persuasion. Yet, the Farm Bureau portrays itself as having 100% of it's membership behind it's endeavors. It is just not true.

Back to the air quality monitoring issue. I am for measuring these gases at the property line. Not my residence. If my children or myself choose to take advantage of all my property, I should have the right to expect that my neighbor. Whether it be farmer or chemical or pharmaceutical company keep all it's pollution on it's property and under control. If I can't trust that fact and am scared of using a part of or all of my property, I consider that a "taking of my property". You know as well as I that Farm Bureau and the hog industries agenda is to delay and prolong any attempt at any "real" kind of standard that they could ever be held accountable.

I have set at community meetings and listened to a County Farm Bureau President express how he hires a professional company to come in and spread his manure that uses Global Positioning. So, that he gets every bit of value as to the correct amount. So, as to not waste any precious drop. Yet, I know his part time hired man comes to work and tells me that the manure company showed up and The F Bureau President told him to spread in this field and that field. And the custom operator said that you know that we have spread in all these close fields for the last 4 yrs. And they surely have way too much on them. The F Bureau Pres. said I can't afford to haul it any further and if you won't spread it there I will get someone else who will. What's the point in bragging about Global Positioning? The next question is who is going to trust this guy to give up a true and accurate soil test result to prove that those fields needs more. Yet, if you would've been setting at that meeting you would've thought he and his wife were the most trustworthy people (try looking in Butler county for them).

I know of custom built buildings in Butler county that had cement poured for the pit that ranged from 10-12 thick down to 1-2. It was never screeded off down there in the pit. No one is going to go roller skating down there. And wherever the construction worker walked, it cracked around his foot. No one is present to watch over the construction of these buildings.

I have some friends that had to spend sometime up to the Rochester Mayo Clinic for health reasons. They shared a room with a guy that had lung cancer and who had spent most of his years working in buildings over pits. I got to believe that the Mayo Clinic would have some kind of statistical info which could be correlated into something that would show actual facts on this subject. Wouldn't it be worth a phone call by your agency?

Anyway, thank you for your efforts and please stand your ground.

Sincerely,
Leonard Sinnwell.

From: "Brent Naeve" <bdnaeve@trvnet.net>
To: <bryan.bunton@dnr.state.ia.us>
Date: 2/18/04 9:16PM
Subject: Air Quality Standards

Dear Mr. Bunton,


I am a third generation farmer in Humboldt County, Iowa. I do not currently raise any livestock but there are more than 35 confinement hog buildings within two miles of my farming operation, for a total of 40,000 pigs every day.

I am concerned that the 15 ppb level for proposed air quality standards for hydrogen sulfide are too low. I think a level of 70 ppb would be a better screening level if health risks are the concern. I feel the purpose of a 15 ppb level is not a health issue, but an odor issue, which is only a social annoyance. I feel the rules should be based on health risks, not social nuisance.

Brent Naeve
114 Hall Street
Humboldt, IA 50548
515/332-5408



Eichelberger Farms

PRODUCING QUALITY  ASSURED PORK

P.O. Box 8
208 West Depot
Wayland, IA 52654

Phone 319-256-6912
Fax 319-256-6913

February 13, 2004

Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, Iowa 50322

Dear Mr. Bunton:

As a member of a family farming operation in southeast Iowa whose main income comes from pork production, I would like to provide my input on the proposed air quality standard for hydrogen sulfide.

We have long realized the importance of protecting the environment and maintaining positive neighbor relations. In order to achieve this, we do many things including, but not limited to, directly injecting our waste into the soil. Although this requires more acres to spread our manure on, we feel it is better for both the environment and our neighbors.

I would urge you to base any decisions and regulations on sound science rather than be influenced by public opinion. I must also ask why the DNR has already given a benchmark of 15 ppb as the acceptable level of hydrogen sulfide. I fully realize this is only a standard given for use in your air quality study, but once that number is in the minds of the general public, it is very unlikely that the final number will be anything other than 15 ppb. Additionally, from what I have heard, 15 ppb is ludicrously low. In fact, this is even more stringent than the *indoor* air quality standards adopted by the Centers for Disease Control! Please put a stop to mentioning *any* number as a benchmark until further studies have been done.

Iowa has long been a state ideal for raising hogs, and raising hogs has served Iowa well. As our society has become more focused on individual rights, many vocal opponents to hog production have made it their mission to drive hogs out of Iowa. While I fully support rules and regulations based on sound science, I ask you again to not be influenced by the pressures of the vocal minority.

RECEIVED

FEB 18 2004

As a parting thought, I would like to give you a brief history of the past couple months for my family. On the evening of December 26, my brother, his wife, and their two boys (ages 3 and 5 months) returned from grocery shopping to find their house in flames. Unable to reach 911 from his cell phone, he called me so I could call 911. Living only two miles away, my wife and I got there as fast as we could. All that was left to do until the fire department arrived was to get what we could out of the garage.

The house, which was a total loss, was the family house we grew up in. It is located on our "Home Farm", which consists of 3,600 sows. The house is about 600 feet away from the nearest hog building.

The reason for telling you this story is because they have decided to rebuild on the same foundation. If the living conditions near this farm were unhealthy, or even a nuisance, they would not be building on the same spot – especially since they have two young boys. So why are they rebuilding there? It is because they know it is safe, and the smell is noticeable maybe two or three times a year, one of those times being during application in the fall.

The real question is why do people fear living next to a hog confinement facility when they are required by law to be much farther away than 600 feet? It is because of people saying things like "anything below 15 ppb of hydrogen sulfide *might* be unhealthy."

Sincerely,

A handwritten signature in cursive script that reads "Brad Eichelberger". The signature is written in black ink and is positioned below the word "Sincerely,".

Brad Eichelberger
Eichelberger Farms, Inc.

From: "Eric & Julie Monson" <ejcc@fmctc.com>
To: <bryan.bunton@dnr.state.ia.us>
Date: 2/19/04 6:53PM
Subject: Air Quality Rule for Hydrogen Sulfide

Bryan Bunton
Iowa Department of Natural Resources
Air Quality Control
7900 Hickman Rd , Suite 1
Urbandale, Iowa 50322

Dear Mr. Bunton:

I am writing to you in response to proposed rule for hydrogen sulfide. I am a farmer from Shelby County. I have farmed for eleven years and wish to continue to make my living through agriculture. I believe the proposed air quality rule for Hydrogen Sulfide is too restrictive, and I would like to see the DNR reconsider their proposal.

Specifically, I am disappointed that the DNR has proceeded to develop the rule that is the same as the nullified one from last year. The legislature said that 15 ppb standard was too restrictive, why would you come back with the same number? I would like to see the DNR reconsider their proposal and to develop a Hydrogen Sulfide standard after the field study is completed and only if the field study determines there is a health impact from CAFOs.

Sincerely,
Eric C. Monson
1948 Street F24
Irwin, Iowa 51446

From: "Hoover, Thayer" <Thayer.HOOVER@Pfizer.com>
To: <bryan.bunton@dnr.state.ia.us>
Date: 2/20/04 1:54PM
Subject: University studies on hydrogen sulfide

Hello, Mr. Bunton,

I got your contact information from the web site announcing the public meetings regarding the DNR's activities surrounding the hydrogen sulfide content near CAFOs. In the text of that message it was stated that:

"If approved, Iowa would be the 28th state to adopt hydrogen sulfide standards. The Iowa proposal is neither the most stringent or most lenient and is based on university recommendations." [emphasis added]

I have conducted several literature searches on the subject and have found quite a range of recommendations. For example, Texas, where oil refineries produce the most hydrogen sulfide in terms of tons/year than any other source, the limit is 80 ppb at the setback. In Minnesota, where environmentalists maintain and pursue the highest of standards, the limit is 30 ppb, double that which the DNR is proposing and advancing as pursuant to university recommendations.

I would like to see the university study reports upon which the DNR based this statement. I would like to review the study design, (materials and methods), the data generated, the conclusions drawn there from and the literature reviewed in generating the protocol. I believe it is necessary to review each study report individually to determine the veracity of any conclusions drawn there from especially since a wide range of recommendations exist, none of which suggest such a low level of ambient air content recommendations for hydrogen sulfide as 15 ppb, possibly suggesting that the Iowa proposal may be the most stringent.

I would appreciate an electronic version of those studies before the next meeting, or at least reference information so I can retrieve those study reports that caused those universities to make a recommendation.

Sincerely,
Thayer C. Hoover, D.V.M.

CC: <coverdwagon@evertek.net>

Bryan Bunton
Iowa DNR Air Quality Bureau
7900 Hickman Rd.
Urbandale, Ia. 50322

February 17, 2004

Dear Mr. Bunton:

I am writing to express my objections to the new air quality standards that are being proposed by the DNR and are presently in discussion phase around the state of Iowa.

It is my belief that these new standards are not being based on accurate or documented science and will have a negative impact on many of us in the livestock industry.

It also appears that there are a number of reputable sources that have conducted studies and few of them have reached a consensus about air quality standards and the health effects they may or may not have on the public.

The proposals that the DNR is submitting have already been rejected in 2003 by the Iowa legislature largely, I believe, for their unfairness and lack of sound scientific basis.

Finally, I feel it is unfair for the DNR to make a separate set of air quality standards for the Iowa livestock industry. The standards that the DNR are proposing are excessive and, if applied equally across all of Iowa industry, would cripple an already suffering Iowa economy and business sector.

Thank you for your time in this matter and I do hope that the DNR will begin to realize the importance of the livestock industry to Iowa and begin to work in partnership with that industry.

Cordially,

Dan Ruf

RECEIVED

FEB 20 2004

2931 Shadow Avenue
Greene, IA 50636
February 18, 2004

Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

Re: Hydrogen Sulfide

Dear Bryan Bunton:

Setting air quality standards for hydrogen sulfide is a crucial first step because it sets a precedent in establishing thresholds, which will make it difficult to reduce even when science indicates that should be the case.

Iowa State University has indicated federally published levels should be the basis for an Iowa ambient air standard. It seems reasonable to set health standards which mirror standards from national agencies for Hydrogen Sulfide which range from 70 ppb to 20,000 ppb. When different thresholds are established for various sources, such as livestock confinements and municipal waste disposal, the department is targeting a specific source to achieve goals other than public health protection for Iowa's citizens. It appears the DNR is going beyond public health concerns to achieve social ideology.

In addition, it is disingenuous at best for the department to utilize proposed standards, which the joint report proposed for separated distances, and then refer to those standards with tests done at the property line or 1000 feet from the residence. The department needs to reconsider its confrontational approach in dealing with ambient air standards and balance fairness to the livestock industry with the need to protect public health.

Respectfully,



Ronald Litterer

RECEIVED

FEB 20 2004

Twinam Farms Limited

3010 297th Street ~ Crawfordville, IA 52621
Phone 319-658-2823

February 18, 2004

Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, Iowa 50322

Dear Mr. Bunton,

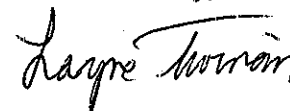
I am writing in regards to the proposed Hydrogen Sulfide standards.

I don't think such standards should be considered since the report they are based on is flawed. Iowa State University has come out and said the report recommending 15ppb of hydrogen sulfide is being misinterpreted and is flawed. That number was set in conjunction with other gases being present. If any number should be considered it should be from 70 ppb to 20,000ppb which is used by other national agencies.

The measurement should be taken where it impacts people, not at a property line. I don't understand why hydrogen sulfide from livestock buildings is being targeted vs. all sources that produce it. Is hydrogen sulfide from a hog building different from municipal sources or a factory?

In closing I don't think any standard should be set until it is determined if it is needed. This should be determined by completing unbiased and standardized air test at points of impact. This issue has strayed from sound science to emotion.

Sincerely,



Layne Twinam

RECEIVED

FEB 20 2004

From: <lkspencer@wccta.net>
To: <bryan.bunton@dnr.state.ia.us>
Date: 2/21/04 10:04AM
Subject: Air Quality Standards

Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau

Dear Mr. Bunton,

As the DNR works to develop Clean Air Rules for our state, please keep the health of rural Iowa citizens at the center of the discussion of air quality standards. Clean air is vital to the health and well being of all Iowans, including those of us who live and farm near large scale livestock confinement operations

Thank you for working to protect one of our most important natural resources -- clean air!

Sincerely,
Katheryn Spencer
1925 Utah Ave.
Goldfield, IA 50542

From: "Bob Casterton" <rcastert@netins.net>
To: <bryan.bunton@dnr.state.ia.us>
Date: 2/22/04 8:18AM
Subject: Air Quality Rule for Hydrogen Sulfide

Dear Mr. Bunton:

I am writing to you in response to proposed rule for hydrogen sulfide. I am a farmer from Bremer County, have farmed for 17 years and wish to continue to make my living through agriculture. I understand the DNR is proceeding with an air quality rule for hydrogen sulfide which is too restrictive and I would like to see the DNR reconsider their proposal. The 15 ppb standard came from a report by the two state universities, and now Iowa State has spoken out publicly against using the 15 ppb standard, and the University of Iowa is reconsidering. I don't believe that the Joint University Report can be used any longer as the justification for air quality rules and as the basis for a standard. It was not based on good science.

It is disappointing that the DNR has proceeded to develop the rule that is the same as the nullified one from last year. The legislature said that the 15 ppb standard was too restrictive, why would you come back with the same number? I would like to see the DNR reconsider their proposal and to develop a Hydrogen Sulfide standard after the field study is completed and only if the field study determines there is a health impact from CAFOs.

Bob Casterton
2460 Oakland Ave.
Readlyn, IA 50668

CC: <bob.brunkhorst@legis.state.ia.us>, <david.lalk@legis.state.ia.us>, <Willard.Jenkins@legis.state.ia.us>

February 22, 2004

Bryan Bunton
Iowa Department of Natural Resources, Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

Dear Mr. Bunton,

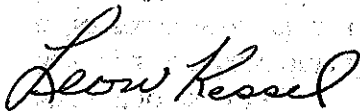
I am a small hog farmer, age 55. I started farming when I was 40 as a second career. I have farmed long enough to understand the impact that government has on agriculture, but still remember very clearly the trials and tribulations of a beginning farmer. Our son has joined our farming operation as a beginning farmer with a degree in Swine Management. With the leadership of the DNR in our state right now, it would be totally irresponsible on my part to encourage him to stake his future around hog production.

For all livestock producers the hydrogen sulfide proposed air quality rule of 15 ppb is ridiculously off base. A farmer has to know a little about everything, but not be an expert on anything, but even I know that something that small is way out of line. Anything I have read, other than a DNR publication, sets their standards anywhere from 70 ppb to 20,000 ppb before they even start to get concerned. I honestly think you are out on a limb. Iowa State University has spoken out publicly against the process and conclusions of the Joint University Report. The Rules Committee of the Iowa Legislature has already rejected your attempt to use 15 ppb and you (DNR) choose to ignore that. In a year that the legislature is having a very hard time finding money to keep the doors of schools open, I am ashamed that a "sacred cow division" of the governor can be so wasteful with money that is badly needed by other agencies. I have no idea why DNR thinks they can do things like this. I have heard Mr. Gieselman say he is doing it because he has a mandate from the public to protect their air, but I also thought the Legislature represents the public so I do not understand the extreme discrepancy.

I am also working on a special project in the legislature. If I were to listen to the most vocal students in the state of Iowa, we would be passing a bill where it would be legal to drink when they are 10 years old – that would be their public mandate. But instead we chose to use sound science and sound science says that underage drinking is very harmful to youth, thus our bill is to reduce underage drinking and does not reflect the misguided statements of the most vocal public.

Again, I think the way you are getting your samples is another attempt to skew your justification for 15 ppb. I am confident that the majority of the people can see through the sinister attempt to justify a number that you seem to have picked before you ever tested one air sample.

Sincerely,



Leon Kessel
12301 290th Street
Lamoni, IA 50140

Bryan Bunton
Ia Dept of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, Iowa – 50322
February 19, 2004

Re: Air Quality Standard for Hydrogen Sulfide

Dear Mr Bunton:

I am concerned about the proposed air quality standard for hydrogen sulfide

The livestock producers of Iowa support rules and regulations that are solidly based on sound-science I have been producing livestock for 45 years and have worked hard to raise healthy animals, as well as be a good neighbor. More importantly we want our farming operations to be safe and healthy for our families

DNR should NOT move forward with standards or regulations until all data has been collected and field studies completed. New regulations must be appropriate and substantiated by thorough research

Farmers are bombarded with regulations and added costs which we are unable to recoup with sales of our product. With increased time and expense to implement regulations in our business, it becomes impossible to maintain our livestock business. Who will be left to pay taxes that support governmental agencies such as DNR?

I am really concerned that the small and medium sized producers will be extinct in the future generations of livestock producers. Only the ultra large producers will be able to survive

We must have common-sense and thoroughly researched facts before considering increased regulations.

Sincerely,
James Ledger
Washington, Iowa

RECEIVED
FEB 23 2004

From: Lillian Nichols <nichols@mddc.com>
To: <bryan.bunton@dnr.state.ia.us>
Date: 2/24/04 9:58AM
Subject: RE: Air Quality Rule for Hydrogen Sulfide

Dear Mr Bunton,

I am writing to you in response to the proposed rule for hydrogen sulfide. I am a farmer from Adair County. I have farmed for nearly 30 years and wish to continue to make my living through agriculture. Even more importantly, I want young people and their families to be able to make their living in production agriculture. I believe the proposed air quality rule for Hydrogen Sulfide is too restrictive and I would like to see the DNR reconsider their proposal.

Specifically, I am disappointed that the DNR has proceeded to develop the rule that is the same as the nullified one from last year. The Legislature said that the 15 ppb standard was too restrictive. It seems really odd that you have come back with the same number.

I would like to see the DNR reconsider their proposal and to develop a Hydrogen Sulfide standard AFTER the field study is completed and ONLY IF the field study determines there is a health impact from CAFOs.

Sincerely,
Lillian Nichols
2188 Clay Ave
Bridgewater, IA 50837

From: <FARMDIVER@aol.com>
To: <bryan.bunton@dnr.state.ia.us>
Date: 2/24/04 11:00AM
Subject: Hydrogen Sulfide Air Quality Rule

Dear Mr. Bunton:

I am writing to you in response to the proposed rule for hydrogen sulfide

I am a 3rd generation farmer in southwest Pott County. I am a corn/soybean farmer and I do not have livestock. I do sell some of my crop each year to a local cattle feeder. The selling of my crop to local livestock feeders is an important marketing option to me.

I do not believe that the department is able to justify the 15 ppb hydrogen sulfide level, regardless of the Joint University Report. Iowa State University has spoken publicly against the Joint University Report process and its conclusion. Other national agencies have standards and levels at or above 70 ppb. The Iowa legislature has already said that the 15 ppb standard is too restrictive.

More study is required before any rule or regulation is implemented and I believe a starting level for the study would be at 70 ppb or above, not at 15 ppb. We need sound scientific evidence to set rules and regulations, not personal bias for or against the livestock industry.

Sincerely,

David Brandt

11475 240th Street,
Council Bluffs, IA
Farmdiver@aol.com



February 22, 2004

Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road
Urbandale, IA 50322

Dear Bryan:

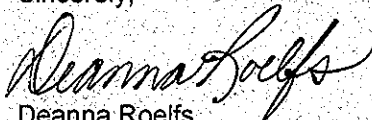
On behalf of Iowa Select Farms, I am writing this letter in response to the Iowa Department of Natural Resources proposed hydrogen sulfide rule for livestock producers and would like to provide public comment. Iowa Select Farms does not support the proposed 15 ppb hydrogen sulfide standard for only 8 hours per year. The proposed standard is not consistent with even the most conservative levels established by the United States Centers for Disease Control.

Over the past several months, I have observed the process of information gathering and rule making leading to the proposed air quality standard. From the ICCI petition and assertions at Environmental Protection Commission (EPC) meetings, to the development and results of the University of Iowa and Iowa State University joint report, to testimony to the EPC by Iowa livestock producers and agri-business representatives, and to legislative action requesting an air quality field study and nullification of 2003 IDNR proposed standards. You heard EPC testimony from Iowa State University's Dean of Agriculture, Catherine Woteki, strongly requesting the IDNR to base air quality standards on the Agency of Toxic Substance and Disease Registry (ATSDR) conservative guidelines of 30 ppb. These guidelines are set to protect sensitive populations and would also serve to protect the citizens of Iowa. Dean Woteki also stated that the 30 ppb for hydrogen sulfide level will align Iowa with scientifically determined federal recommendations.

When the Iowa Legislature nullified your proposal last year, it provided the IDNR with very clear direction. They requested the IDNR to base standards on good science and stay within the boundaries of Iowa law. However, the IDNR continues to monitor hydrogen sulfide at various distances from farming operations rather than at the neighbor's residence, as unmistakably defined in the law. The IDNR is also proposing a duration exposure level of only 8 hours per year without any scientific justification. As you are aware, the most conservative, science based health screening standards call for exposure levels at 30 ppb for up to 365 days per year without health risk.

Even with the preponderance of evidence and direction to the contrary, the IDNR continues to move forward with the 15 ppb hydrogen sulfide standard. In other words, if the perceived problem is serious, the overwhelming evidence to the contrary is irrelevant to the IDNR. We encourage you to reconsider your actions and understand that good air quality is important to all of us, and is not limited to special interest or activists groups. Please conduct the monitoring study in accordance with Iowa Code and evaluate the information prior to determining air quality standards. The best interests of both Iowa citizens and Iowa agriculture will be served.

Sincerely,


Deanna Roelfs
Director of Communications

CC: Jeff Hansen, Iowa Select Farms President and CEO
Dr. Howard Hill, Iowa Select Farms COO
Jeffrey Vonk, IDNR Director
Kathryn Murphy, EPC Chair

RECEIVED

FEB 24 2004

From: "John D. Fredrickson" <john@wccta.net>
To: <bryan.bunton@dnr.state.ia.us>
Date: 2/25/04 10:59AM
Subject: Air Quality Standards Debate

Dear Bryan Bunton:

I am writing in regards to the Air Quality Standards Debate. The following items are my stands on the debate:

1. Farmers care about clean air. Iowa livestock producers are for clean air and a quality environment. They support rules and regulations that are based on sound science, not driven by fear. Many farmers are voluntarily implementing techniques to reduce odor from the use of coal filters and planting tree buffers to knifing manure into the land upon application. Their families live and work on the land so it's in their best interest to care for the environment.

2. The 15 ppb standard is not supported by sound science. Iowa State University evaluated DNR monitoring data and determined that the assumptions for setting their initial recommendation of 15 ppb were wrong. The proposed 15ppb is not consistent with levels established by the U. S. Centers for Disease Control. The CDC has set levels of 70ppb for 1-14 days of continuous exposure and 30ppb for 15-364 days of continuous exposure. Establishing 15ppb sends a false message to Iowans that this is the necessary level to protect public health.

3. Monitoring should be done at separated locations. The proposed rule says that the monitors will be located between 328 and 984 feet from a separated location. Because some separation distances for existing confinement operations were at 750 to 1250 feet, this distance requirement may put the air monitors closer to the livestock operation than the residence. Monitors should not be closer than the required separation distance.

Sincerely,

John D. Fredrickson
1078 350th St.
Gowrie, Iowa 50543

From: Ken Pangburn <kenpangburn@direcway.com>
To: <bryan.bunton@dnr.state.ia.us>
Date: 2/25/04 12:24PM
Subject: Proposed Air Quality Standards for Hydrogen Sulfide

February 25, 2004

Mr. Bryan Bunton
Iowa DNR Air Quality Bureau
7900 Hickman Rd.
Urbandale, Iowa 50322

Dear Mr. Bunton,

I am writing in regards to the proposed air quality standards for hydrogen sulfide. I am opposed to the level of 15 ppb because it is not supported by sound science and will negatively impact the livestock industry in Iowa. This standard is also much more stringent than the one used by the U.S. Centers for Disease Control.

I believe it is important for you to know that members of my family have lived less than a quarter mile east of a modern hog operation for nearly 30 years. This operation built the first of three confinement buildings in 1972 and had completed all three of the buildings prior to 1980. This includes a slurry store system for handling the manure with the manure being applied to the producer's own row crop ground. This producer has placed in the top in the county yield contests for both corn and soybeans for years. My family has experienced no adverse health effects from living near this operation and we continue to have family dinners and barbecues outdoors during the summer months. It should also be noted that this hog operation helped two young farm families get their start in farming. Both are still farming today and have raised their families in this community. This is the kind of economic development that Iowa needs.

I care about clean air and water. After all, I live here and work here. I breathe the air and drink the water. But I do not support rules and regulations on the livestock industry that are unfounded and based more on the perception of a vocal minority than on facts and sound science. Please reconsider the proposed hydrogen sulfide standard and base your regulations on sound science.

Sincerely,

Kenneth M. Pangburn
1117 Jerico Ave.
Corning, Iowa 50841

CC: "Angelo, Jeff" <jeff.angelo@legis.state.ia.us>, <cecil.dolecheck@legis.state.ia.us>

From: Herbert Scott <hessts@pcpartner.net>
To: <bryan.bunton@dnr.state.ia.us>
Date: 2/25/04 4:48PM
Subject: Iowa Air Quality

Bryan,

As a Iowa farmer (beef cattle, grain and hay) I am interested in the quality of the air my family and my neighbors breathes. If the results from the DNR's hydrogen sulfide field study indicate levels exceeding the arbitrary 15 ppb standard the DNR came up with (and, apparently, will improperly measure at inappropriate locations), then it appears that they will then be authorized to develop plans and programs that may add new regulations to any livestock operation

Doing this would seem to send a false message to Iowans that this is the necessary level to protect public health and would be a slap in the face of sound science and the CDC. Saddling farm operations with such not only will adversely affect their operation and financial viability, but may well result in further deterioration of the state's economy -- exactly the opposite of what we should be and currently are pursuing at the state level

I would ask that the proposed field study not be carried out as proposed but rather that air quality rules in compliance with statutory law and developed utilizing sound science be pursued and regulations established if found they would yield significant overall positive results for our state

Thank you for giving this your consideration

Herbert E. Scott
6291 Indian St.
Kellogg, IA 50135

CC: <Dennis.Black@legis.state.ia.us>, <Paul.McKinley@legis.state.ia.us>, <Paul.Bell@legis.state.ia.us>, <Geri.Huser@legis.state.ia.us>, <Jim.Van.Engelhoven@legis.state.ia.us>

Ray Slach Farms
5693 420th Street S. E.
West Branch, IA 52358-9523
(319) 643-7251
rslach@Lcom.net

February 25, 2004

DNR Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322
ATTN: Bryan Bunton

Dear Mr. Bunton:

I am writing this letter to express my concerns regarding the Hydrogen Sulfide and Ammonia Standards that are currently being proposed. I have concerns because I operate a family farm and raise hogs in confinement buildings. If the proposed standard of 15 ppb for Hydrogen Sulfide and 150 ppb for Ammonia is set, I am concerned that the economic effect will be too much of a burden for family farmers like myself. Since cost-effective equipment and technology is not currently available to reduce the odor emissions, small producers may not be able to afford the expense to comply with these standards. Combine the expense incurred to comply with the standards with the low profit margins in the hog industry and this could be one more financial burden to force even more family farmers out of business.

I propose a more effective solution to this problem at this time is to have more research into the technology needed to reduce the Hydrogen Sulfide and Ammonia being emitted from the hog facilities and then set standards that can be reasonably met. Some of the most well educated people are living in Iowa. They work in our Universities and also in the private sector. I propose that we need to direct our resources towards new technology and more research into solutions to this problem. I know first hand of one company from Peoria, Illinois that has developed equipment to process manure in hog confinement facilities that will reduce the Hydrogen Sulfide and Ammonia emissions. Dr. Duane Bundy from Iowa State University has evaluated this equipment and measured the emissions from my hog confinement buildings. Further research needs to be done with this and other technology to set reasonable emission standards and develop equipment that is reasonably priced for the family farmer. After the development of such equipment, then reasonable standards could be set.

In the 1990s, the veterinarians and the State of Iowa developed a successful plan to eradicate pseudorabies in swine herds. They were able to achieve this with cooperation from pork producers and financial support from the State of Iowa as well as the Pork Producers Association and grant money. I propose that the same type of cooperation and financial support should be used to work to find solutions to the odor issues. Affordable technology needs to be developed first and then reasonable standards could be set. The livestock producers like me are in support of a program to reduce odor from confinement facilities, but not at the ultimate price of their farming operation. Please consider postponing the standards until such affordable technology is available to farmers in Iowa.

Sincerely,

Ray Slach

John Weber
3213 Highway 8
Dysart, IA 52224
February 23, 2004

Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, Iowa 50322

Re: Air Quality Standard for Hydrogen Sulfide

Dear Mr. Bunton:

I would like to provide comments for the proposed air quality standard for hydrogen sulfide.

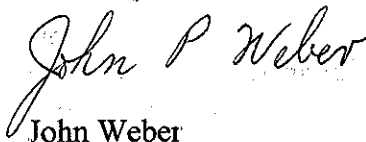
I am an Iowa farmer and long time pork producer for 28 years. I am well experienced with all the odors of production agriculture. Some of the odors are extremely offensive and I would not want to live in them for a lifetime. From the health standpoint I think the most serious odors are from farm chemical application to crops. They can truly make you sick.

With the issue of hydrogen sulfide I also have experience. In 1990 I accidentally killed 17 nursery pigs when agitating manure in a pit below the pigs. I was told by ISU Extension that it was H_2SO_4 . I learned a lot from that experience and now know all of the precautions I need to take when cleaning my confinement barns. However most odors are not toxic or health hazards. They are usually a temporary nuisance.

I would like to see a better way to measure both inside and outside of my buildings and at various distances what levels these gases are present. I have not been able to find that information or technology anywhere or from any other source. We are dealing with a valid issue but how can we set regulations when we don't know the answers to what we are regulating.

I want to continue to raise pigs and my son does as well. We are open minded to science and technology and ways to do a better job such as reducing odor. Let's first get the facts together and then try to make all production agriculture a better and safer business.

Sincerely


John Weber

RECEIVED

FEB 25 2004

From: <theclausens@stratemail.com>
To: <bryan.bunton@dnr.state.ia.us>
Date: 2/26/04 11:41AM
Subject: Air Quality

Dear Bryan Bunton,

Thank you for your efforts on air quality. I attended the public hearing in Atlantic, February 25, 2004. I was disturbed by a few of the emotional testimonies on both sides. I understand the emotions on both sides, but this issue is too important for Iowa to skew the information with over-reaction.

We need to know if there are adverse health effects caused from livestock production, so that it can be dealt with using economical and effective solutions. However, before programs or regulations are put into place and undo financial burdens are placed on operations that are working on thin margins already, we need to know without a doubt that livestock production (or any other industry) is causing the adverse effects. The term "factory farms" is used a lot by ICCI, but I am sure you are aware that most of these "factory farms" are owned and operated by "family farmers," another term used by ICCI. We want to be the best stewards of the resources that God has given us to use while we are here. We need to be responsible and held accountable, but please make sure that all the data concludes that there is a problem before jeopardizing the livestock industry in Iowa.

Small farmers and livestock producers will quit with more regulations. Mid-sized farmers will quit or get larger. More DNR regulations add to the cost of production and do not generate revenue. Large farms have too much invested to quit and are able to spread compliance cost over more units. The effect is that more regulations lead to fewer farmers with bigger operations.

Thank you for your time and please consider what the ultimate effect of your actions will be.

Clausen

Feeder/ Farmer

Jeff

Cattle

From: "Sarah Jespersen" <sarah.jespersen@delong-sportswear.com>
To: "Brian Button" <brian.button@dnr.state.ia.us>
Date: 2/26/04 3:46PM
Subject: Fw: Comments on Atlantic Meeting 2-25-04

----- Original Message -----

From: Sarah Jespersen
To: Brian Button
Sent: Thursday, February 26, 2004 3:16 PM
Subject: Fw: Comments on Atlantic Meeting 2-25-04

Dear Brian,

Attended the meeting last night and wanted to put in my share of comments

This was my 2nd meeting, as I was at the IWCC campus in September 2002, I think it was - Much smaller meeting, much smaller crowd of air quality rules opponents. Much of what is said is hot air and a waste of time - I'm sure you agree and it must be very frustrating

Perhaps what these cowboyhatwearing glassbafflesonpickuptruckdriving livestock producers need is for someone like you and your colleagues to spell the rules out for them in THEIR language. Denise O'Brien made it clear to me that the proposed rules, if passed, would still not be LAW. This I did not understand from your powerpointing, etc...

I knew many, many of the producers who were present last night, and nearly all of them are "family farmers" who inherited their farms. They have family money. They are, I'm quite sure, all incorporated. Sorry, that's not a family farm. And if they were like my Dad, who had to pay his Dad for his farm, they would be working in a factory.

My suggestions to you and your colleagues: Raise the limit to 30ppb hydrogen sulfide. Lower it later, if possible. This gives the good ole' boys hope that they can continue to smell their money, but they perhaps don't have to let it waft so strongly on their neighbors. One mysterious "gentleman" who spoke last night, a portly, late middle-aged man with white hair and a suit with a last name that began with "R", suggested 70ppb for 14 days!!! I have personally experienced 70ppb, monitored by DNR/UHL, and was FLABBERGASTED that such a suggestion could even be mentioned. I offered him my name and phone number after the meeting, and asked him to call me if he could spend one night smelling and inhaling the level of hydrogen sulfide he suggested. He retorted, "I'm not interested in doing THAT", and walked away. I suspect he was hired by opponents. You and I know this happens.

And please do work to make these people understand the legal procedures. Obviously, several were quite threatened at more controls. There was much reference to "emotions" backing the air standards. I saw more emotion last night from the producers than I have ever seen from proponents. Interesting, and something that should be noted.

And, again, I repeat: The SIZE of livestock lots and CAFO's are the problem. Once the SIZE is controlled, the air quality will improve. The old "several generations" line rings hollow. My family was 3rd generation on the same property, but we never exceeded 100 head of dairy cattle. The NEW generation is the problem, not the preceding 2,3 or 4.

Please do consider what I've said. It means a great deal to Atlantic, Cass County, Iowa, the US, the Gulf of Mexico, and the Earth.

And please do mail me a copy of the comments from the meeting I never got one from the 2002 meeting

Thanks!

A reluctantly quiet observer,

Sarah Jespersen
2810 Chestnut St.
Atlantic IA 5022

712-243-4888
712-243-6215 work

sjerspersen@mchsi.com Home email

From: "Chris Wynia" <cw dairy@mctcnet net>
To: <bryan bunton@dnr.state.ia.us>
Date: 2/26/04 8:54PM
Subject: holistine pumper

Bryan;

Just a little note to let you know that I am not in favor of the new health standards being proposed for the upcoming year. I think that your committee needs to do some more sound research on these facts to make sure that things are being done right. I am a dairy farmer and believe it or not I care about the air and the surrounding environment. I need to raise my family in these safe environments. So I do care. Please take the time to do some sound research. The DNR I think doesn't care as much about the environment as much as I do.

Thanks for your time
Chris Wynia
cw dairy@mctcnet net

Bryan Bunton, Iowa DNR, Air Quality Bureau,

7900 Hickman Rd.,

Urbandale, IA 50322

Dear Mr. Bunton,

Last year, you established ambient air quality standards for hydrogen sulfide and ammonia for all Iowa businesses, including animal agriculture. In April 2003, the Iowa Legislature nullified these standards for two reasons: 1) they were based on faulty numbers and 2) you attempted to step beyond your authority.

This year you have come forward with a "new" health standard for hydrogen sulfide that is not based on sound science. It's the same 15 parts per billion (ppb) over a one-hour average, but is targeted only at livestock operations. If the results from your field study of the state's largest operations exceeds your self-imposed standard, then you the DNR will be authorized to develop plans and programs that may add new regulations to any livestock operation.

Key Points

1. We farmers care about clean air. Iowa livestock producers are for clean air and a quality environment. We support rules and regulations that are based on sound science, not driven by fear. Many farmers are voluntarily implementing techniques to reduce odor from the use of coal filters and planting tree buffers to knifing manure into the land upon application. Our families live and work on the land so it's in their best interest to care for the environment.

2. The 15 ppb standard is not supported by sound science. Iowa State University evaluated your monitoring data and determined that the assumptions for setting their initial recommendation of 15 ppb were wrong. The proposed 15 ppb is not consistent with levels established by the U.S. Centers for Disease Control. The CDC has set levels of 70 ppb for 1-14 days of continuous exposure.

and 30 ppb for 15-364 days of continuous exposure. Establishing 15 ppb sends a false message to Iowans that this is the necessary level to protect public health.

3. Monitoring should be done at separated locations. The proposed rule says that the monitors will be located between 328 and 984 feet from a separated location. Because some separation distances for existing confinement operations were at 750 to 1250 feet, this distance requirement may put the air monitors closer to the livestock operation than the residence. Monitors should not be closer than the required separation distance.

Again, we ask that all regulations be consistent and based on sound science. It's only right.

Sincerely,

Harvey W. Fascher
5680 Hwy 13
P.O. Box 137
Coggon, Iowa 52218

Written comments faxed for Urbandale meeting (March 11, 2004)

February 26, 2004


436 Zinnia Road
Exira, IA 50076

Dear Bryan Bunton *et al*,

We were unable to attend the public meeting in Atlantic last night and are using this means to let our opinions be known concerning proposed air quality standards. Common sense must prevail in this matter of overseeing air quality. The DNR's proposal of 15 parts per billion of emission of hydrogen sulfide seems reasonable; the DNR should also monitor other dangerous gases that are emitted from highly concentrated animal feeding operations. According to news reports, Farm Bureau has packed the public meetings to object to the proposal. They may be a majority at the meetings, but they are not in a majority in the general population. Most people want safe air for obvious reasons. Evidently Farm Bureau's concern is monetary consideration for the few, not health concerns for the many. Again, common sense must prevail and the public safety maintained. We are farm people not "city people" who get blamed for not wanting to smell manure. We are submitting this for the Urbandale meeting scheduled for March 11.

Thank you for the work you are doing.

Pam and Gary Wolfe
Phone/Fax 712.764.7777


CATHOLIC CHARITIES
Diocese of Sioux City
"Offering Hope, Healing & Understanding"

February 25, 2004

President
Most Reverend
Daniel N. DiNardo, D.D.

Executive Director
Jerry Eaton, L.M.S.W.

Agency Clinical Director
Audra Cole, L.I.S.W.



Sioux City Office
Clinical Supervisor
Audra Cole, L.I.S.W.

Fort Dodge/Algona Offices
Catholic Social Services
Clinical Supervisor
Ariene Nicola, L.I.S.W.

**Carroll/Storm Lake
Offices**
Clinical Supervisor
Doreen Loeffelholz, L.I.S.W.



**A United Way
Member Agency**

Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale IA 50322

Dear Mr. Bunton:

We are writing in regard to the DNR's proposed Clean Air rules.

Our agency serves the residents of 24 counties in Northwest Iowa. We support strong air quality standards because of our concern for the health and well-being of the people who live in this area and in all of Iowa.

Because of the proliferation of factory farms in several of the counties in our corner of the state, we believe strong air quality standards are necessary to protect citizens. As you know, the joint University of Iowa and Iowa State University report states that hydrogen sulfide and ammonia have been measured near factory farms in concentrations that could be harmful to humans.

We object to the DNR decision not to include an ammonia standard of 150 ppb and odor standard of 7:1 dilution rate in the rules.

We object to the "7 day grace period" that factory farms would get each year. Each violation should be counted.

We object to the monitoring exemptions. All people should be protected. Legal separation distance requirements must be enforced.

We support the proposed air standards of 15 parts per billion of hydrogen sulfide for a one-hour average.

We are concerned with the makeup of the technical advisory committees. They should be representative with health experts included.

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FEB 27 2004

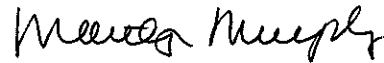
RE: Bryan Bunton -- 2-25-04
Page 2

We are concerned that pressure from special interest groups may lead to abandoning the joint University air quality study by not including an ammonia and odor standard. The health and well-being of Iowans is the paramount issue

We recommend the DNR purchase and use technology such as portable air monitors/permanent monitoring devices to properly check and regulate gas emissions

Thank you for your consideration of our objections and concerns

Respectfully,



Marilyn Murphy
Social Concerns Facilitator/
Rural Life Contact

MM/ln

RECEIVED

FEB 27 2004

Land O'Lakes, Inc.

2827 8TH AVENUE SOUTH
FORT DODGE, IOWA 50501
TELEPHONE 515-576-7311

Swine Production Division

February 26, 2004

Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, Iowa 50322

Re: Air Quality Standard for Hydrogen Sulfide and ammonia

Dear Mr. Bunton:

Land O' Lakes provides the following comments for the proposed air quality standard for hydrogen sulfide and ammonia.

It is Land O'Lakes, Inc. position that all regulations should be science-based. Iowa Law required the DNR to conduct field studies of livestock air emissions to determine if there is a health risk from livestock facilities. At this time no conclusive evidence has been presented to indicate that emissions from livestock facilities create a definable health hazard, upon which to base any regulations on certain or all livestock facilities.

It is important that proposed standards comply with other governmental standards. These include:

- o Federal Clean Air Act
- o Guidelines from the Federal Agency for Toxic Substances and Disease Registry (ATSDR);
- o Forthcoming EPA/CAFO regulations
- o NIOSH

The monitoring of hydrogen sulfide conducted by the Iowa DNR at various distances from the farming operation has shown that animal production can create short term exposure of hydrogen sulfide. The ATSDR indicates that short term exposure of hydrogen sulfide causes health risk at 70 ppb. Based on the federal ATSDR level, it is not justifiable to set 15 ppb as the public health level and it is not consistent with levels established by the U.S. Centers for Disease Control

The EPA is planning to implement a study of "Animal Production Air Emissions" to determine levels of air emissions from animal feeding operations. It is anticipated that regulations in response to those findings may be implemented. Land O'Lakes, Inc. recommends waiting to implement additional regulations at the state level until there are science-based air emission standards in the regulatory body.

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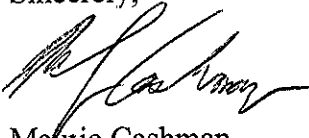
FEB 27 2004

The Iowa Legislature mandated separation distances for livestock facilities to address public concerns about emissions before facilities were built. Most farmers have been diligent in locating facilities not only to meet these standards, but also to minimize any potential impact to neighbors. I would encourage the Iowa DNR to monitor emissions at the neighbor's residence, as is consistent with the facility setback requirements mandated by the legislature.

New regulations will affect our family farmer cooperative members. Additional regulations may encourage consolidation and larger facilities to absorb the additional costs to comply with these standards. Should they be implemented it will be important to provide cost support to encourage the economic growth of our Iowa family farmers. It will also be important to provide practical and economically feasible measurement tools and methodologies.

While we do not oppose new regulations, it is important that they be science based, reasonable, practical to implement, and synchronized with other government standards and regulations.

Sincerely,



Maurie Cashman
Director of Business Development

RECEIVED

FEB 27 2004

From: "Mark and Rachel Costello" <martello@radiks.net>
To: <bryan.bunton@dnr.state.ia.us>
Date: 2/28/04 10:35AM
Subject: proposed hydrogen sulfide standard

Dear Mr. Bunton,

I am writing to express my opposition to the proposal to lower the hydrogen sulfide standard to 15 ppb

I am concerned that the standard is so low that it may have a great impact on the livestock industry in our state. If we negatively impact this industry, it hurts all of us economically.

As a grain producer, I would be impacted by the reduction in demand for my products as feed. It's hard enough to keep farming the way things are now. I look at arbitrary rules that are not based on sound science, but on the opinions of a vocal minority with a questionable agenda, as a personal attack on my way of life. The proposed 15 ppb standard is exactly what we don't need.

Sincerely,

Mark Costello
37265 Rains Ave
Imogene, IA 51645

CC: <hubert.houser@legis.state.ia.us>, <effie.lee.bogges@legis.state.ia.us>

Mr. Bunton,

As a citizen that has been very adversely affected by a factory hog lot 1/3 of a mile upwind from my residence, I plead with you to support strong air quality standards again proposed. In addition to the loss of enjoyment of my property of 28 years many days during the summer, there is the obvious reduction in value & ability to sell in the future. While too late to help me, this restriction is in the best interest of the general population. Thank you.

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From: "Al & Ruth Schafbuch" <alscha@netins.net>
To: "Bryan Bunton DNR" <bryan.bunton@dnr.state.ia.us>
Date: 2/29/04 8:02AM
Subject: DNR's proposal on Air QualityRule

Bryan Bunton
DNR Air Quality Bureau

The 15 ppb proposed regulation for hydrogen sulfide is more stringent than indoor air quality standards adopted by the U.S. Centers for Disease Control

New rules and regulations must be fair and they must be based on substance. The levels proposed by the Iowa DNR fall far short of that criterion. They cannot be substantiated in research nor are they endorsed by national recognized agencies.

The Iowa Legislature nullified the DNR air quality standards last year. Now DNR is proposing the same standards that the elected Senators and Representatives asked you to change as this will destroy the agriculture economy of Iowa.

Thanks
Al Schafbuch
1191 58th St.
Dysart Iowa, 52224
319-476-3727
alscha@netins.net

From: Linda Blaine <lblaine@starband.net>
To: <bryan.bunton@dnr.state.ia.us>
Date: 3/1/04 12:57PM
Subject: Public Hearings on Clean Air Rules for Factory Farms

Hello,

I planned on attending the public hearings for Clean Air Rules in Atlantic on Feb 25 but couldn't make it as a friend's house burnt down & that took precedence, but I want you to know how I feel about clean air in Iowa.

I support your hydrogen sulfide standard of 15 ppb but we still need an ammonia standard of 150 ppb and odor standard of 7:1 dilution rate now.

Your job is to protect our state's natural resources. The 2 state universities recommended stronger measures to protect our resources and our health.

I'm wondering why you are dragging your feet and whose pocket you may be in, and I am very disturbed that you harm future generation's resources.

These confinement operations are popping up all over Monona County, emitting their eye crossing smells and polluting the water of everybody from Sioux City to New Orleans.

Please explain to me why most of the people must suffer so a few can make money? The managers and owners of the factory farms don't care about their neighbors or their animals.

Family farmers produce a much better product with less environmental impact and greater economic benefit for local economies.

Why won't you help us protect our beautiful state's resources? Why won't you do your job? If you have some rationalization for your inaction, Iowans deserve an explanation.

I'm waiting,
Linda Blaine
33265 Co. Hwy L16
Moorhead, IA 51558

CC: <letters@news.dmreg.com>, <wilmes@agrnews.com>, <editor@farmnews-iowa.com>, <editor@messengernews.net>, <gary.metro@lee.net>

From: "Chuck Goodman" <cmgrfg@hotmail.com>
To: <bryan.bunton@dnr.state.ia.us>, <bryan.bunton@dnr.state.ia.us>
Date: 3/1/04 6:30PM
Subject: Hydrogen Sulfide and Ammonia Standard

Mr. Bunton,

I believe the proposed hydrogen sulfide standard of 15 ppb is too strict and will have a negative impact on Iowa's livestock industry and economy. We farmers support rules and regulations that are based on sound science, not opinions and perceptions. We also believe in clean air and water because our loved ones breathe the air and drink the water every day. I was at the public hearing in Atlantic and it was made very clear that the majority do not support this standard.

Respectfully,
Charles Goodman

CC: "Effie Boggess" <effie.lee.boggess@legis.state.ia.us>, "Hubert Houser" <hubert.houser@legis.state.ia.us>

Testimony to the Iowa Department of Natural Resources**Regarding:****The establishment of animal feeding operations health effects value (HEV) and
Health effects standard (HES) for hydrogen sulfide**

Thank you for the opportunity to provide input in this important discussion. By way of introduction, my name is Dr. Craig Rowles. I am a former practicing veterinarian and now a full-time pork producer located in the Carroll, Iowa area. In the past I have served in a number of boards, including the Iowa Pork Industry Center Advisory Board, the Iowa Pork Producer's Research Advisory Committee, the National Veterinary Advisory Committee to the National Pork Board, and served as Chairman for the Carroll County Board of Health. I hope these credentials indicate my interest in livestock production as well as the health and well-being of the general population.

I have reviewed the proposed hydrogen sulfide health effects standard as well as the Iowa Concentrated Animal Feeding Operation Air Quality Study (IA CAFO), which was used as the basis for this intended action. I would make the following comments:

The Agency of Toxic Substance and Disease Registry (ATSDR) has listed its Minimum Risk Levels (MRLs) for hydrogen sulfide. These levels are referenced in the IA CAFO AQ study in chapter 8, Table 6, page 173. These levels indicate a maximum acute exposure (1-14 days continuous) of 70ppb and maximum intermediate exposure (>14 days -- 365 days) of 30 ppb. The IA CAFO AQ study then went on to recognize the potential additive or synergistic effects regarding multiple gaseous exposures by having NH₃ or particulate matter, etc. present simultaneous with hydrogen sulfide. The apparent concern caused the joint committee to halve the ATSDR hydrogen sulfide recommendation to 15ppb for intermediate exposure conditions. The study also assumed that these conditions exist at a residence or public use area.

Testimony provided to the Environmental Protection Commission by Dr. Catherine E. Woteki, Dean of the College of Agriculture at Iowa State University, indicates that the current data from the DNR monitoring sites indicate that the maximum hydrogen sulfide and ammonia levels do not typically peak at the same hour of the day or day of the year at swine sites. In addition, an evaluation of the data shows that the duration of exposure is more consistent with an acute exposure (exposure of 1-14 days).

My interpretation of these comments leads me to draw the conclusion that the current ATSDR standard of 30ppb is the more appropriate minimum level for the animal effects standard.

Another issue which needs to be addressed is the location of the monitoring stations to evaluate these levels. It appears there are some discrepancies regarding the location of the monitoring devices. Some of the current DNR monitoring sites are less than the distance for a separated location. My understanding of the joint study is that the basis of their recommendation was at the point of the separated residence or public use facility. I would hope this issue could be resolved.

Finally, if the department and the environmental protection commission is truly interested in protecting the health and well-being of all Iowans, why are concentrated animal feeding operations being singled out for regulation? Wouldn't all sources of hydrogen sulfide be of concern? Targeting the animal industry for this health-based standard appears arbitrary at best.

Thank you for your consideration.

Craig Rowles DVM

Febr. 27, 2004

Mr. Bryan Bunton
Iowa DNR, Air Quality Bureau
7900 Hickman Rd.
Urbandale, Iowa 50322

Dear Mr. Bunton,

We are writing to you in regard to the DNR's Proposed Standard for ambient air quality standards for hydrogen sulfide and ammonia for all Iowa businesses, including animal agriculture. As we understand, in April 2003 the Iowa Legislature nullified these standards for two reasons: (1) they were based on faulty numbers and (2) the DNR attempted to step beyond its authority.

Again the DNR has come forth this year with a "new" health standard for hydrogen sulfide that is not based on sound science! It's the same 15 parts per billion over a one-hour average, BUT IS TARGETED ONLY AT LIVESTOCK OPERATIONS. IF THE RESULTS FROM THE DNR'S FIELD STUDY OF THE STATE'S LARGEST OPERATIONS EXCEEDS THEIR SELF-IMPOSED STANDARD, THE DNR WILL BE AUTHORIZED TO DEVELOP PLANS AND PROGRAMS THAT MAY ADD NEW REGULATIONS TO ANY LIVESTOCK OPERATION.

Farmers care about clean air. Iowa livestock producers are for clean air and a quality environment. They support rules and regulations that are based on sound science, not driven by fear. Many farmers are voluntarily implementing techniques to reduce odor from the use of coal filters and planting tree buffers to knifing manure into the land upon application. Their families live and work on the land so it's in their best interest to care for the environment.

Also the 15 ppb standard is not supported by sound science. Iowa State University evaluated DNR monitoring data and determined that assumptions for setting their initial recommendation of 15 ppb were wrong! The proposed 15 ppb is not consistent with levels established by the U.S. Centers for Disease Control. The CDC has set levels of 70 ppb for 1-14 days of continuous exposure and 30 ppb for 15-364 days of continuous exposure. Establishing 15 ppb sends a false message to Iowans that this is the necessary level to protect public health.

We suggest that monitoring should be done at separated locations. The proposed rule says that the monitors will be located between 328 and 984 feet from a separated location. Because some separation distances for existing confinement operations were at 750 to 1250 feet, this distance requirement may put the air monitors closer to the livestock operation than the residence. Monitors should not be closer than the required separation distance.

We wish to thank you for listening to our concerns and that unscientific rules and regulations do not drive animal agriculture out of Iowa.

Sincerely,

Elven & Jane Steenbock
703 Apple Road
Perris, Iowa, Iowa 51563-4062

RECEIVED

MAR 01 2004

February 24, 2004
15642 Old Arroyo Circle
Rio Hondo, TX 78583

Bryan Bunton
Iowa DNR
7900 Hickman Rd.
Urbandale, IA 50322

Dear Sir:

I am and will continue to be a long time member of the Iowa farming community, but when it comes to quality of life issues, anything the DNR can do to slow the spreading of liquid hog manure on top of the ground would be appreciated.

When I am in Iowa, my permanent home is in Delaware County. If it wasn't for my grandchildren being nearby, I would be moving out of there because of the stink.

Sincerely,

A handwritten signature in cursive script that reads "Wm. L. Ballou". The signature is written in black ink and is positioned above the printed name.

Wm. L. Ballou

RECEIVED

MAR 02 2004

From: "Brian Dougherty" <milkman@fbx.com>
To: <bryan.bunton@dnr.state.ia.us>
Date: 3/3/04 10:27PM
Subject: Air Quality Standards

Dear Mr. Bunton,

I am writing to you about my concerns with the proposed 15ppb standard for hydrogen sulfide air emissions. I believe that setting the standard at that level sends the false message that this level needs to be achieved in order to maintain public health. This has never been proven by sound science. I believe that the standards set by the U.S. Centers for Disease Control would be sufficient to safeguard public health.

As a farmer, I can assure you that we do everything possible to limit odor emissions from our farm. We live and work on this land, and it is in our best interests, as well as the general public's, that we be good stewards of the land.

Please keep these points in mind as you move forward with the decision-making process on this issue. Thank you for your consideration and time.

Brian Dougherty
1330 Four Corners Road SE
Waukon, IA 52172
(563) 568-0060
milkman@fbx.com

3.3-04

When we were told 2 buildings were going up 1/2 mi from us, they told us we wouldn't smell a thing. I thought they were going to put up the kind that come from Canada - no fans. Then when I saw 24 fans on the side I knew better. Sure enough pigs went in April and the smell was there. These buildings are down in a valley and the smell comes up to our door - like a fog would. We can not open our E or S windows when the wind is from the S. Smell comes right in the kitchen + living room! We sell sweet corn and on really "bad smell" days every customer asks where is that "stink" coming from - you point to the site + their response is "you poor people". Since the buildings have gone up I've had 3 asthma attacks. The first thing the specialist asked me was "do you live by a confinement building?" I've lived in my home about 40 yrs and this is what I get! No more sitting outside after your day work! Not if the wind is from the South I wonder if the smell is so bad what about unseen gasses. You have to do something to keep our living the best, healthiest we can. I feel it is very important that the DNR's proposed hydrogen sulfide standard as recommended by the joint University study be enforced. It should include an ammonia and odor standard also.

Robert + Kathryn Harrington

1455 270th St.

Nashua, Ia 50658

641-435-4045

We live 3 1/2 mi ~~of~~ East Nashua

RECEIVED

MAR 03 2004

3-1-2004

Dear Bryan Buntan D.N.R.

I attended the public hearing in Atlantic Feb. 25. I have several concerns.

1.) the 15 ppb over a one hour average is too low.

I am a livestock producer and concerned for clean air & a quality environment.

Why are livestock operations targeted and not coal fired power plants and city waste water plants?

2.) 15 ppb standard is not supported by sound science.

3.) Monitoring should be done at separated locations. Monitors should not be closer than the required separation distances.

Thank You, Curtis Miller
2175-185th St Clarinda, Iowa

Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road Suite 1
Urbandale, Iowa 50322

Re: Air Quality Standard for Hydrogen Sulfide

Dear Mr. Bunton

I would like to provide comments for the proposed air quality standard for hydrogen sulfide.

If this is really a health issue all possible sources of H₂S should be regulated equally. In my opinion it would hardly seem possible to be able to select only one industry and expect the courts to uphold such a regulation.

I would also expect that if this applied to all municipal waste lagoons and the tolerance was only 15ppb that there would be a public outcry unlike we have never seen because all cities would be in violation of the law.

I have a swine finishing unit that has an earthen basin and I suspect it will be wiser for me to retire than comply. It is good that I am sixty two and not thirty.

Sincerely
Gene Ver Steeg



RECEIVED
MAR 03 2004

February 26, 2004

Mr. Bryan Bunton
Iowa DNR Air Quality Bureau
7900 Hickman Road
Urbandale, IA 50322

Dear Mr. Bunton,

I am opposed to DNR's proposed air quality standard for hydrogen sulfide. The 15 part per billion proposed standard is too stringent, twice as strict as any standard being used currently by any health, safety or environmental agency. It is also unfair to single out production agriculture as an industry required to meet the proposed standard.

I have been a life-long rural Iowa resident. I travel the state daily with my job and it is my opinion that livestock odor was a much more noticeable problem years back with open hog and cattle feedlots on most Iowa farms. I am hard pressed today to smell the kind of livestock odor in rural Iowa that I did 20 or 30 years ago, even around CAFO's. In fact, that may be part of the problem! It is so uncommon today to smell livestock odors, that when we do, we complain about it.

Sincerely,



Darrell Weems

cc: Representative Jodi Tymeson
Senator Doug Shull
Representative Ralph Watts

RECEIVED
MAR 03 2004

From: "Dana R Dohrmann" <dohrmann@sswireless.net>
To: <bryan.bunton@dnr.state.ia.us>
Date: 3/4/04 8:01AM
Subject: Bryan Bunton on DNR air quality standards

Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, Iowa 50322

Re: Air Quality Standard for Hydrogen Sulfide

Dear Mr. Bunton:

I would like to provide public comments for the proposed air quality standard for hydrogen sulfide

It is very important to base all regulations on science. It is also important that any air quality standards follow the guidelines that are presented by federal government data, such as Agency for Toxic Substances and Disease Registry (ATSDR). This data is used as a screening tool to protect the most sensitive individuals.

The monitoring of hydrogen sulfide conducted by the Iowa DNR at various distances from the farming operation has shown that animal production can create short-term exposure of hydrogen sulfide. The ATSDR indicates that short-term exposure of hydrogen sulfide causes a health risk at 70 ppb. Based on the federal ATSDR level, I don't believe that the department is able to justify 15 ppb as the public health level.

Lastly, since state law requires enforcement at the separated distance, I encourage the Iowa DNR to monitor at the neighbors residence. Iowa farmers have worked diligently to minimize emissions to protect our own families. As a result of being a heavily regulated business, we have maintained separation distances from neighbors as required by state law.

Sincerely,

Dana Dohrmann
932 140th street
Hampton, Iowa 50441

From: Gerrie <gerrie@iowatelecom.net>
To: <bryan.bunton@dnr.state.ia.us>
Date: 3/4/04 12:19PM
Subject: Hydrogen Sulfide 15 ppb

I want to go on record as being in favor of the DNR 15 ppb. That is a start, and it may prove that it should be LOWER in the future.

I was sitting in the front row at the hearing at Mason City Public Library March 3, and was amazed at the health issues that were obvious on the hog factory farmers while they proclaimed they had no ill health from their operations.

I noticed poor circulation in their hands, (very obvious from where I sat) and their hair showed obvious signs of health stress. These were not caused by something temporary, like being nervous when they speaking in front of a crowd.

To add to that, a farmer that used to live 4 miles from our farm died a horrible death. The Doctor told his family it was caused by the gasses from the hogs (he was a confinement hog farmer). So the farmer from Chickasaw County did not know what he was talking about when he got up in front of all of us and said he had never heard of anyone from his county dieing due to the hog confinements.

I got awfully tired of hearing the marathon speakers from the Farm Bureau with their exact words of 'sound science'. I could tell exactly where that came from after the 4th or 5th 'sound science speech'. They had nothing of their own to say, just parroting the Farm Bureau.

We were a Farm Bureau member for years, until we discovered they were putting us out of business. And using our membership money to fund it. I am tired of Farm Bureau running the state, and using other peoples money to run the independent farmer out of business.

Clean air is very important to me

Regards
Gerrie Etter
Ionia IA

From: "Alan" <alanseil@wccta.net>
To: <bryan.bunton@dnr.state.ia.us>
Date: 3/4/04 10:11PM

Dear Mr. Bunton:

I would like to comment on the proposed air quality standard for hydrogen sulfide

There is a lot of negativity directed toward the swine industry. Some of the negativity has been for things that have happened in the past before regulations were in place. Now I feel like the we the pork producers are being run out of Iowa not because we are making Iowa a terrible and unsafe place to live but because of what people are told about the air we breath. Have you proven this? We should be looking at facts on air pollution. The hog business is very important to me and Iowa's economy. Please make sure your decisions are bases on good science. I ask you to check the air at the separated distance instead of checking it closer to a building. The ATSDR indicates that 300 short-term exposure of 70ppb causes a health risk. The number 15 ppb seems alittle unfair to me

Thanks for taking toime to read this.

Alan Seil

(The following text is mirrored and appears to be bleed-through from the reverse side of the page.)

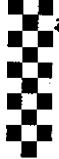
From: "Alan" <alanseil@wccta.net>
 To: <bryan.bunton@dnr.state.ia.us>
 Date: 3/4/04 10:11PM
 Subject:

Dear Mr. Bunton:

There is a lot of negativity directed toward the swine industry. Some of the negativity has been for things that have happened in the past before regulations were in place. Now I feel like the we the pork producers are being run out of Iowa not because we are making Iowa a terrible and unsafe place to live but because of what people are told about the air we breath. Have you proven this? We should be looking at facts on air pollution. The hog business is very important to me and Iowa's economy. Please make sure your decisions are bases on good science. I ask you to check the air at the separated distance instead of checking it closer to a building. The ATSDR indicates that 300 short-term exposure of 70ppb causes a health risk. The number 15 ppb seems alittle unfair to me

Thanks for taking toime to read this.

Alan Seil



Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, Iowa 50322

Re: Air Quality Rules

Dear Mr. Bunton:

We are writing to object to the proposed rules for air quality. We are a family farming partnership from Union County, Iowa. Over 85% of our gross sales are from livestock production and without that livestock we would be out of business. The DNR is attempting to adopt the same rules that were nullified last year, only now you are aiming at a smaller constituency. The legislature said that the 15 ppb standard was too restrictive, why would you come back with the same number?

If the objective is better human health, then the standards should apply to everyone and the measurements should be taken where people live. If the objective is to harass livestock producers, then the standards should apply only to livestock and the measurements taken as close to the livestock facilities as possible. Unfortunately it appears that your objective is the latter and not the former.

Last year we planted seven wildlife food plots, left uncut waterways, have brush piles, native grass, brushy areas and six farm ponds stocked with fish all at our own expense. We have an abundance of deer, turkey, geese and the pheasants and quail are coming back. We will not cooperate with one branch of the DNR in providing wildlife habitat and hunting and fishing access while the other branch of the same agency harasses us on our livestock production

Sincerely,

James M McKnight
James M F Knight
Sam McKnight
Jill M McKnight

McKnight Farms
2469 150th Street
Afton, Iowa 50830

March 2, 2004

Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road Suite 1
Urbandale IA 50322

Dear M/MM:

Though I was unable to attend the local hearing on the Proposed CAFO hydrogen sulfide standard in Atlantic, IA, I would like to weigh in with my comment that the standard as suggested by the joint Iowa State/Iowa study released just 2 years ago at 15 ppb be adapted without further delay. This is a good standard that will protect our health while it should not adversely affect family farm producers. We understand that with the DNR having only a limited number of monitors, only the largest CAFOS will be targeted for monitoring. I feel that the 15 ppb H₂S standard is a reasonable one compared to that in other states some of which have even stricter standards.

Thank you for giving me the opportunity to contact you on this subject.

Sincerely,



Jan Rahmani
1711 Eastern Ave
Red Oak, IA 51566


RECEIVED
MAR 04 2004

3/4/04

Mr Bryan Bunton -

I attended the 3/3/04 meeting at the Mason City Public Library. I am a family farmer north of Clear Lake. I raised hogs for 33 years and fed cattle for 6 years. I still grain farm. I thought there were many valid points brought up at the meeting. I am not opposed to clean water and air, but I think the 15 PPB threshold is too low, and the monitoring is in suspect. I feel the same as the last gentleman that spoke - start out with the 70 PPB that the CDC has recommended and go from there. After more is known, adjust if necessary.

Thank you for your attention

David Luscomb
19257 Dove Ave
Clear Lake, IA 50428


From:
To: <bryan.bunton@dnr.state.ia.us>
Date: 3/5/04 7:40PM
Subject: Hog farm

Dear sir:

I work for a hog confinement in southern Iowa and I do not agree with their ideas and comments on the air quality of their farms !!!!! I have worked for numerous hog farms and the air quality of all of them are what I consider

" HORRID" I have been sitting back and watching them the last few days and they have sent a paper to all the farms to tell everyone about the Hydrogen Sulfide press release , and to all the farms they have sent the same "DRAFT LETTER" to send to you Of course they are to "put it in their own words" but I bet when you receive them they will all state basically the same thing... "They do not agree and want you and or somebody to come and scientifically measure the air quality" I say, "Come on down" but do it unexpectedly and you will find what you are stating is true , but if you set a date and they know about it they will somehow get in there to empty the pits and or lagoons I am sure of it. I am in the barns everyday and am sick @ least 4 times a year because of the air quality in the barns.

I know a lady that used to work for a hog farms (not the ones I presently work for) but she had to quit because of the quality of air in the barns she constantly had pneumonia because of it and the Doc told her she had to get out of it, or the next time she got sick would probably be her LAST.

Now that is CRAP !!!!! I am sick of being SICK . and tired of these A_____S getting away with saying the air quality is good or within range and they are not even there....they sit in their offices and tell us what , when ,and how and under no circumstances do it any different !!!!! I am tired of them telling me if I miss one more day because I am sick or whatever then I loose my job !!!!!!! BULL ---- I am sick because of the air in there !!!!!!!!! \

Please DO NOT give them my email or let them know I contacted you and I will do what I can to help you out I cannot afford to loose my job , because I contacted you!!!!!!!

Sincerely

Concerned

Stanton, Iowa
March 2, 2004

Bryan Bunton, Iowa DNR
Air Quality Bureau
7900 Hickman Road
Urbandale, Iowa 50322

Dear Sir:

We are writing to you concerning the DNR's Proposed Standard for air quality. As farmers, we care about the quality of air in our environment. We and our families live and work on the land, so it is in our best interest personally to care for the environment.

However, we feel that the proposed 15ppb standard is not supported by sound science. Iowa State University has examined the data and determined those standards to be wrong.

We hope that you will research these standards based on sound scientific evidence, not on data based on fear.

Sincerely,

Dwight Vennerberg
Marjorie Vennerberg
Dwight and Marjorie Vennerberg
2583 L Ave.
Stanton, Iowa 51573

Our Senator is Jeff Angelo
and our Representative is Cecil Dolecheck

RECEIVED

MAR 05 2004

From: <Fishguy59@aol.com>
To: <bryan.bunton@dnr.state.ia.us>
Date: 3/6/04 9:11PM
Subject: "NO" to the 15 ppb proposal

I have only been a member of the Iowa Farm Bureau for about 8 years now, but I strongly disagree with the the proposed 15ppb ruling that the DNR wants to pass. I think that the level should be set at a level just below the point that can be "scientifically" proven to cause a material or verifiable adverse health affect. I have several family members that have been raising hogs & cattle for years and have no ill effects what so ever. All family and friends that I know are responsible stewards of there land and the local communities. If we allow the proposed 15ppb, we will simply drive all the hog & cattle operations to more user friendly states, or worse yet out of the country. How will this help our already depressed economy, both state and national!

Sincerely, Lonnie Hayes
 Glenwood, Ia

CC: <Fishguy59@aol.com>
 Please do not reply to this e-mail. Use the Reply All button.
 Subject: "NO" to the 15 ppb proposal
 Date: 3/6/04 9:11PM
 To: <bryan.bunton@dnr.state.ia.us>
 From: <Fishguy59@aol.com>

From: "Wendell Davison" <wdavison@dtnspeed.net>
To: <bryan.bunton@dnr.state.ia.us>
Date: 3/7/04 10:10PM
Subject: Comments on Proposed DNR Air Quality Standards

The purpose of this e-mail is two fold. First, I would like to express my opposition to the proposed DNR air quality standards. Secondly, I would like to express my displeasure with how the recent DNR public hearing was conducted in Mason City on March 3rd.

Regarding the Mason City meeting, I was one of those individuals who had requested the opportunity to stand and speak regarding the proposed DNR air quality standards. I spent several hours that day sorting through my thoughts and eventually came up with what I planned to say that evening at the public hearing. With more than 20 minutes remaining before the public library was to close we were told that the meeting was to conclude. We know for a fact that there were at least 20 people who requested to speak and there were probably more who would have spoke from the floor that were not given the opportunity. Many of these people drove more than two hours waiting for the opportunity to voice their opinions. It seems very unfair that the 20 individuals who were not given the opportunity to speak were not even given the chance to participate in a show of hands if we were in favor of or opposition to the proposed standards. I had this meeting on my calendar for the last three weeks with the intentions of stating my opposition to the proposals. As we approach spring I am concerned that time will not allow me to attend the second meeting that is being planned. Hopefully that will not be the case.

Now to the DNR proposed standards - I stand in opposition to the 15 ppb hydrogen sulfide standard. I believe the standards should be 30 ppb for 15-365 days of continuous exposure. This level is the level recognized by Iowa State University and the Center for Disease Control as an appropriate level. Establishing 15 ppb sends a false message to lowans that this is the necessary level to protect public health. I also stand in opposition to where the emission readings are currently being taken. Monitoring should be done at separated locations. Monitors should not be closer than the required separation distance. I am in support of Senate Study Bill 3123 and House Study Bill 395 currently working their way through the State Legislature.

My wife and I currently live on the family farm started 40 years ago by my parents. We have 3 sons - 2 in high school and one son in college. Our oldest son is studying ag in college and plans to return to the family farm upon completion of college.

As my son and I discuss our plans for his entry into the family operation, we both realize that feeding livestock will be the cornerstone of his future in agriculture. As I write this tonight, I feel the proposed air quality standards being discussed pose a tremendous threat for my operation, to others feeding livestock, and to the future of our next generation of farmers.

The house that my wife, 3 sons, and I live in on the family farm sets in the middle of 4000 finishing pig spaces. 600 feet west are 2400 pig spaces, 500 feet to the east are 1400 pig spaces, and 400 feet to the south are another 200 pig spaces.

Over the past 25 years, I estimate that my father, my three sons, and myself have spent nearly 26,000 hours in total working in hog confinement buildings. My dad is 64 and is as active today as he was 10 years ago. I am 40 and feel better today than I did 5 years ago largely because of lifestyle changes I chose to make that had absolutely nothing to do with our hog confinements. My three sons are in perfectly good health. Their health is good enough to let them compete as three sport athletes in junior high and high school. If the air emissions from our hog operation are as dangerous as we are led to believe, how could my family conduct the activities just mentioned. Were family operations like ours analyzed when the proposed regs were established?

Over the past several years our operation has spent many hours putting together manure management plans(mmp) With those mmpps in place we have worked hard to implement them and have attempted to be a good neighbor in all aspects of our swine operation. Many of the regulations imposed by the state over the past 2-3 years have proven to be of benefit to the producers of the state, our neighbors, as well as our environment. The same can't be said for the standards we are discussing today. In fact, if implemented I feel they would create tremendous economic hardship that would ripple up and down our small rural communities as well as jeopardize the future generation of agriculture.

In closing, I have one point for you to consider. As I pick up the local newspapers, listen to local radio, and watch regional TV it would appear to me that the current trend in meth production and addiction poses a much larger danger to our state's economy and its resources (human life is our most precious natural resource) than any possible pollutant that might be dispersed into the air by our states feedlots. Maybe it's time for the state's policy makers & rule enforcers to re-evaluate what poses the biggest threat to our state and allocate our resources (financial and human) in a manner that would better deal with the true problem at hand.

Thanks for giving me the opportunity to share my thoughts regarding this very important issue.

Wendell Davison
2130 290th Street
Garner, IA 50438

From: "Patrick and Ann Bosold" <bosolds@lisco.com>
To: <Bryan.Bunton@dnr.state.ia.us>
Date: 3/8/04 8:58PM
Subject: Hydrogen sulfide standard comment

Dear Mr. Bunton,

I support the proposed hydrogen sulfide standard of 15 parts per billion (one-hour average) that was recommended in the Joint University study. This standard will be protective of public health, and there is no reason to back off from the recommendations of this study. Iowa also needs standards for ammonia and odors from factory farms, as recommended in the Joint University study. This standard would help, not hurt, Iowa's family farmers. Responsible family farmers will not be the target of the DNR's air quality monitoring efforts, because there is no reason to believe their operations would violate the standard or pose a threat to public health.

Sincerely yours,
Patrick Bosold
202 N 5th St.
Fairfield, IA 52556

March 8, 2004

Mr. Bryan Bunton
Iowa DNR
7900 Hickman Road
Urbandale, IA 50322

Dear Mr. Bunton,

My name is John C. Smith and I am a young farmer from Manchester, Iowa. I am writing to you because of my concern with the proposed rules that the DNR is considering regarding hydrogen sulfide and ammonia exposure. I feel that your agency is not using sound science. You are blatantly ignoring the Iowa Legislature and are unfairly targeting the livestock industry.

I grew up on a small hog and grain farm near Ryan, Iowa and graduated with a Agriculture Business Degree from Iowa State in 1994. I have worked in the chemical/fertilizer industry as well as the seed industry for the last 10 years. Last spring I had the wonderful opportunity to fulfill a life long dream and that was to begin farming on my mother-in-law's farm. Our operation consists of 470 acres of row crops and custom feeding 1200 head of fat hogs/year.

I recently became aware of your agencies' "new" health standard for hydrogen sulfide (15 ppb) and am astonished that it is the same standard the Iowa Legislature nullified in April 2003! To my understanding your agency is collecting this data at distances from livestock facilities that are less than the actual separation distance required by law. This makes your findings even more unjust!

The U.S. Center for Disease Control has established 70 ppb for 1-14 days of continuous exposure and 30 ppb for 15-364 days of continuous exposure. There is no reason to set levels any more stringent than what the Center for Disease Control has set unless your agency is set on dismantling the original "value added" agriculture industry of this state.

The livestock industry has been the backbone of the Iowa economy since Iowa became a state. In fact there has been a direct correlation between the health of a local economy and the livestock industry. The more healthy the livestock industry the more healthy the local economy. Just look at what the disappearance of the cattle industry and the CRP has done to Southern Iowa. I went through there just last year on RAGBRAI and was surprised by its beauty but saddened at what was left of most of the towns and communities.

As a young producer, I am tired of hearing how Iowa just doesn't have anything to offer young people today and that we are losing our most valuable resource when they leave for a job outside this state. I am also tired of hearing that we must tax the people remaining in Iowa, so that we can create funds to attract "new industries" to this state. But what I am most tired of is that a State of Iowa agency is bound and determined to ignore sound science (and the mandates of the

Legislature) and to impose standards that are stricter than what the U.S. Centers for Disease Control has established and that those standards will make raising livestock more difficult! As a tax payer and a producer I find that outrageous and unacceptable!! These standards (that you have set) will not just affect the livestock producer and the livestock industry in general, they will affect the whole of Iowa. As the livestock industry leaves this state it takes with it the foundation which supports so many local economies. With the void that would be created by the absence of livestock in this state, I fear that there could not be a big enough fund created to fill it. I strongly urge you to reconsider your air quality standards for hydrogen sulfide and ammonia and suggest that you adopt the U.S. Center for Disease Control's standards. I also urge you to collect your readings from the separation distances required by law.

With Utmost Sincerity,

John C. Smith

Mr. Bryan Bunton

My name is Donald Nippert. I am a cow calve producer, I also raise corn and soybeans I live in south west Iowa about 30 miles south of Atlantic.

I am writing about the proposed DNR rules on Hydroben Sulfide. You have probably been receiving a lot of e-mail and regular mail, some of it probably has not been very nice, But your job is not to make friends, (That is the job of politicians). You are to make rules based upon sound science. If you offend people from the city or country that is not your priority.

If you set the ppb to low you will drive the hogs and possible the cattle out of this state, I make my living selling my extra corn and soybeans to these hog producers. When they leave they will never come back.

Your job is to set the standards based on sound science. If you do not use sound science on this project this will hurt the DNR down the road. How will any one be able to tell if you are using madeup numbers or scientifically proven facts.

My friends, neighbors, and I have a lot riding on your decision. Thank you for your time.

Don Nippert
Villisca IA

RECEIVED

MAR 08 2004

ISU says DNR's air quality monitoring misleading the public

Iowa Farm Bureau Spokesman
December 20, 2003

By Dale Johnson

Iowa Department of Natural Resources' (DNR) monitoring data from livestock confinements is misleading the public, says Iowa State University.

"It is unfortunate that several reports have been made public that refer to livestock operations with numbers of exceedances that, in fact, are not exceedances at all," Iowa State said in a report summarizing DNR livestock odor and ambient air quality research.

The report was signed by Catherine Woteki, dean of the College of Agriculture, and supported by eight leading researchers at ISU.

It was the third attempt by ISU to raise awareness over how a joint university study is being distorted by the DNR. Copies of ISU's disagreements have been given to the DNR and to Gov. Tom Vilsack.

ISU's concerns were expressed after the DNR continued to reject monitoring recommendations from a February 2002 joint report written by ISU and University of Iowa scientists. Their report was issued after reviewing various studies with recommendations following guidelines written by the Agency for Toxic Substances and Disease Registry.

AIR/cont. on page 3

AIR/cont. from page 1

(ATSDR).

The DNR is proposing hydrogen sulfide level of 15 pp measured at the department's interpretation of a separated distance. A state environmental panel was to consider them this week.

DNR numbers misleading

"It is very misleading to the public and unfair to Iowa's animal industry to misrepresent report that has specified ambient air quality guidelines," the ISU scientists state.

A health-based standard of 70 parts per billion (ppb) for a 1-hour weighted average for hydrogen sulfide measured at the property line should be established, according to the report. At residences, the measurement should be 15 ppb. Standards for ammonia should be 500 ppb and 150 ppb.

Instead, the DNR is proposing a standard of 15 ppb with sampling up to 300 feet from residences and 300 feet from lagoons.

ISU says the numbers for hydrogen sulfide and ammonia are misleading because the DNR is "mismatching" by taking some readings at the property line and some at residences.

ISU said if monitoring is not at "the separated distance," then standards should default to 70 ppb and 500 ppb.

The scientists pointed out that the health-based recommendations represent concentrations, with added safety factors, that track federally publicized levels as summarized by the ATSDR.

"This was an intentional plan by the Joint Report committee so that when new information arises that warrants an adjustment to the reported levels, those adjustments could be applied scientifically in Iowa," the scientists said.

They said the guidelines "protect sensitive populations" to hydrogen sulfide and ammonia exposures. They called it "pure conjecture" for the DNR to assume that the gases from agriculture

are somehow different than gases from non-agriculture sources, thereby warranting tougher standards.

DNR procedures

The scientists also took issue with other DNR proposals:

—Halving by the DNR of the joint report's recommended levels for chronic hydrogen sulfide and ammonia exposure, such as at a residence. ISU called the arbitrary reduction "a mistake."

—ISU said the ATSDR has raised the exposure level for ammonia from 500 ppb to 1,700 ppb as a result of research on human health effects. The DNR has not proposed standards for ammonia, but field measurements are being compared at 150 ppb.

—DNR procedures being used to evaluate odor strength are in-

consistent. The DNR's data claims several exceedances of a 7:1 odor threshold level, which would be a nuisance odor.

"These reported exceedances are being measured at inconsistent distances," ISU said, "and in all cases are at distances far closer to the source than the separated distance for a residence."

DNR staff are improperly using Nasal Ranger odor monitors to gather data. The improper use "also concerns the manufacturer of the Nasal Ranger," ISU noted.

ISU scientists signing the report included Dr. Dwaine Bundy, Dr. Jay Harmon, Dr. Steve Hoff, Dr. Jeff Lotimor, Dr. Stewart Melvin, and Dr. Hongwei Xin in the Department of Agricultural and Biosystems Engineering; and Dr. John Mabry and Dr. Wendy Powers, Department of Animal Science.

Iowa Farm Bureau Spokesman
December 20, 2003

Background

In January 2001, ICCI filed a petition for rulemaking asking the DNR to adopt air quality standard for livestock operations. While their specific petition was eventually denied, the DNR has continued to pursue air quality standards for livestock operations.

In February 2002, at the request of the DNR and the Governor, Iowa State University and the University of Iowa prepared a report reviewing the current air quality research. Included in the report was a recommendation to adopt air quality standards.

In April 2002, Senate File 2293 was enacted requiring the department to do a field study of air emissions near livestock operations. The DNR began this field study near the largest operations in the state to develop the "worst case scenario" to establish the level of air pollutants from livestock operations.

Over the winter of 2002-2003, DNR conducted public hearings on a proposal to establish ambient air quality standards for hydrogen sulfide and ammonia for all Iowa businesses. In April 2003, these standards were adopted and then nullified by the legislature because they were not based on the best scientific research available.

Proposed Health Standard

In December 2003, a nine-member governor appointed commission that oversees the Department of Natural Resources (DNR) approved a health effect standard for public comment. The DNR has proposed a new health standard for hydrogen sulfide for comparing the data collected from the livestock study. If the standard is exceeded at the monitors placed in the study, the DNR will be authorized to develop plans and programs to regulate any livestock operation.

The proposed hydrogen sulfide standard is the same as the one nullified by the legislature this past April, except that it only applies to livestock operations for the field study. The health effects standard proposed by the DNR remains at 15 ppb over a 1-hour average. While this standard similar to the Iowa State University/ University of Iowa Report, the standard is not consistent with levels established by the Agency for Toxic Substances and Disease Registry (ATSDR), a division of the U.S. Centers for Disease Control, upon which the report is based.

Monitoring Locations

Besides setting the health effect standard for hydrogen sulfide, the location of the air monitors is still a concern. The DNR changed the definition of separated location (residence, church, business, school, cemetery, or public use area) to be consistent with Iowa law. This happened because of public comments and the hard work of Farm Bureau members over the past two years. However, the DNR is still proposing the monitors to be placed a large distance away from residences.

The proposed rule says that the monitors may be located between 328 and 984 feet of a separated location. Because some separation distances for existing hog confinement operations were at 750 to 1250 feet, this distance requirement may put the air monitors closer to the livestock operation than the residence. We are asking the DNR to locate the monitors within 300 feet of the residence, but no closer than the required separation distance.

KERMIT DE BOOM

5023-200th St
Sibley, IA 51249-7582
712-724-6338
dboomkmp@frontiernet.net

March 4, 2004

Dear Mr. Bunton,
Iowa DNR

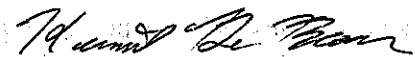
I recently read that the Iowa farm bureau wants the ag community to send a note to you. First I want to say that the Farm Bureau **does not** represent all of the ag community in Iowa!!! I try to live in a home 1400FT. from a 3300 head hog farm and have 2 more units within a mile (one owner lives 7 miles away). It has been pointed out it is not in their financial interest to cover storage tanks or do anything else they don't have to do to help me live here. I do believe that it is time for regulatory standards in Iowa ag (all ag - I am a grain farmer). I believe in health & preventive medicine. I have yearly medical visits, exercise, watch cholesterol, blood psi to hopefully have a long healthy life (I'm also a trustee on the local hospital board). The Farm Bureau says to wait for sound science to determine the health impact on the people. I interpret this as saying that the financial health of animal ag is more important than the medical health of rural Iowa!!! If science proves in the future that the hydrogen sulfide emissions standard is too high it should be easy to relax however, if it is too lax this same battle will be fought over again. I value my health and strongly support these regulations.

This isn't a time to back down!

Thank You For Listening!

Sincerely,
Kermit J. De Boom

Signature



RECEIVED

MAR 08 2004

Brian Bunton
Iowa Dept of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, Iowa 50322

Dear Sirs

I attended the meeting on Tuesday of last week at Spencer on the proposed air pollution rule for Iowa's Livestock producing areas. I was one of around 25 concerned producers that represented the feeling of the other 75 that were at the meeting. The following paragraphs are some of my conclusions and added testimonies.

I fed my first pen of cattle in 1951---(and I am still trying to get it right!!). During all those years I have been deeply involved with livestock trade organizations and the goals they promote. I have been president of the Sioux County Cattlefeeders, chairman of the Iowa Beef Industry Council and chairperson of several committees of the National Livestock and Meat Board. I have been privileged to have had the opportunities to give many oral testimonies on livestock and beef issues ranging from the Price Commission Hearings of the middle '70s and a visitation with President Carter in the Oval Room to numerous federal and state legislative subcommittee hearings here in the midwest. I have always believed this type of one on one format is a super avenue of expression. Further, I have felt good about this type testimony because it always seemed like the recipients were glad and appreciative of the kind of grass roots input. I can't accurately my dismay --or was it disgust?--that all these dedicated men and women that gave their time to travel up to 100 miles on a foggy winter night had only a TAPE RECORDER to address their concerns!!! There are nine members of the Environmental Protection Commission (two which were local) and NONE have taken their appointment seriously enough to bother to listen first hand. Did they think they would be confronted with a riotous group of ruffins with questionable intellect and armed with pitchforks and corn knives?? With that kind of half-hearted dedication one wonders if anyone other than maybe a ISU senior ag student will actually sit down and listen to the tapes---or summarize any of the written papers. It almost appears as a case where state government really doesn't much care what the people think---rather just to create a pretense of being interested for the sake of the grass roots mediation.

Now that you have some of my conclusions of your kind of format concerning issues that are and will be very important to rural Iowa in the years to come, please try and accept my comments on the proposed rule on air pollution.

RECEIVED

MAR 08 2004

I can remember when Aunt Bess and Uncle Bill would take their Sunday drive with the windows down and pass by my feedlot. They laughed and joked about the special kind of odor and always remarked how much it helped the sinuses!! Further down the road they would pass by a neighbor's field of new mowed alfalfa and remarked how nice it smelled.

It's all a part of Iowa farming and rural living. And you know???---in the rural parts of the state, with the exception of the concentrated hog confinements areas of north central Iowa, it really hasn't changed that much! Sure, open lot livestock facilities have their own unique characteristics that have grown with the industry---but stays in direct relationship to the healthy economic activities on mainstreet.

In my some 50 some years of livestock feeding, I have seen the jobs that have generated from livestock feeding---banking, feed stores, equipment dealers, trucking firms and good paying hired farm hands---jobs that are secure and that have become a major part of the infrastructure of the rural Iowa town. They are jobs that won't disappear to Mexico or China or Thailand. It has been well documented how a county with substantial livestock feeding has a economic advantage over one that has only cash crops. Sometimes it might not smell well to a minority group from the city, but all the people of Iowa share in the revenues that flow to the state capital.

I wouldn't know hydrogen sulphide if he came in the door! Being associated with open feedlots, I have never been exposed to the potential health problems it may possess. But my colleagues have and I stand by their experience and testimony. It seems obvious that too much of most any kind of chemical element is unhealthy, but it seems we should be talking more reality rather than fiction or the possible results of extreme pollution. It might come to the point of asking ourselves, when do you start sacrificing a healthy state wide industry for a atmosphere of Lewis and Clark's time? One thing we all hope: let's try and address the level of regulation that will be based on common sense and proven facts rather than suppositions and guess work.

Please don't regulate our livestock industry to the point of diminishing returns that points only to one answer: shut it all down in favor of crops and grass. It should be obvious that with my 79 years, my interest is sure not self motivated---and I have no offspring that have chosen to continue feeding livestock in Iowa. Rather, this paper is a sincere effort to promote and protect an industry that has and is serving Iowa and the world well. I'm proud of our environmental accomplishments up to this point, and, given the incentive to do so, it will continue.

Sincerely



Glenn Gregg
Hawarden

RECEIVED

MAR 08 2004

2003 Midyear Conference

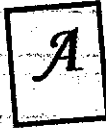
Notes

3-3-04

To whom it may concern:

I oppose The DNR
Setting of hydrogen sulfide
at 15 ppb over a 1 hour
Average.

Ry Arends



Roy Arends
506 State St.
Alexander, IA 50420-8024

RECEIVED

MAR 08 2004

From: "Kent" <Conservk@iowatelecom.net>
To: <bryan.bunton@dnr.state.ia.us>
Date: 3/9/04 1:30PM
Subject: Air quality

Bryon, I have a Murphy 3 barn (1100hd each) site in Audubon County. The local veterinary office, along with the local board of health did some odor studies in my area. They found hydrogen sulfide levels to be in the 6 parts per billion area. I know that there are times in the summer months that the air from the Slurry tank can be somewhat offensive. I live within 1500ft. of the barns. When the DNR does finally make a decision on how much hydrogen sulfide is a safe level, I hope they keep in mind a couple of things, #1 take the measurement at separation distances-not along roadsides, property lines, ect. #2 Remember that the hog producer more than likely wants to hear new ideas to help odor control than a bunch of neighbors telling him his operation smells terrible!! We're open for suggestions, as long as it's reasonable. Thanks for your time, Kent Grabill Audubon, Iowa GO HAWKS

3-6-04

MIR BURTON

I SEE by THE NEWSPAPERS THAT
JIM DOINS IS TRYING TO STIR UP
THINGS AGAIN.

I LIVE AROUND ~~A~~ Hog FACTORY
THAT MOVED IN ABOUT ONE
MILE FROM.

THE STINK IS TERRIBLE AT TIMES.

I KNOW THAT THE DNR HAS NO LAWS
ON ~~OR~~ "ODOR CONTROL" BUT
THERE ARE LAWS ON AIR POLLUTION
THEN CAN YOU OR ANYONE TELL ME
WHY THEY ARE NOT BEING ENFORCED
WITH PEOPLE LIKE THE DOLCHECKS
WITH THEIR HOG FACTORYS AND ONE
OF THEM IN THE LEGISLATURE AND
PROBABLY MANY MORE FARMERS AND
POLITICONS ARE ALSO ARE WILLING TO
LET OR MAKE ANY RULES THAT WOULD
THE QUALITY OF ~~PEOPLES~~ PEOPLES
LIFE

OVER

ALL FOR THE LOVE OF MORE MONEY-
THE FARMERS (BIG ONES) ARE
~~RUINING~~ RUINING THIS STATE.

I COULD GO ON TON
BUT WE DEPEND ON YOU & YOUR
AGENCY TO STAND THEIR GROUND
AND HELP ALL OF US OUT THAT
ARE SUBJECTE TO THE KIND OF
TREATMENT AND ENVIOREMENT
WE HAVE TO LIVE IN

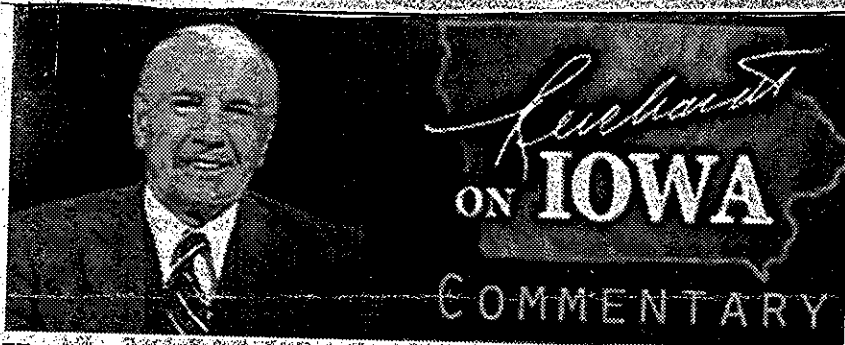
MAKE THEM STOP THE STINK.
IT IS NOT RIGHT THAT SO MANY
OF US HAVE TO LIVE THIS WAY

LARRY BUCKINGHAM

3129 190TH ST
KELLER IOWA
50133

RECEIVED

MAR 09 2004



Heartland pig raisers

BY BILL REICHARDT

There has been no issue that I've talked about that has created such public response that even compares with that of the hog raising industry. As a matter of fact, the number of those protesting was shocking. Here's my view on this controversy:

There are well-respected farmers who make a good living raising pigs, when their other farming businesses are not profitable. Here's how it works.

Let's just take the Heartland Pork Co. in Iowa Falls, founded by a very risk-taking entrepreneur named Bruce Ratsetter. Of the 25 million hogs raised a year in Iowa, his business produces over a million hogs a year.

This company contracts with individual farmers all over rural Iowa to build hog confinement buildings on their property, which the farmer will own. The farmer then feeds and cares for the company's hogs and is responsible for the disposal of the animal waste.

Heartland Pork Co. encourages them to use equipment that spikes the manure six inches into the ground, dramatically reducing odor and runoff. This company created a huge feed-making plant facility, utilizing local grain supplies, built many buildings, owns a lot of farm equipment and trucks, and they contract for local warehousing to store animal feed. There are professional employees and many other well-paying jobs. It's big business, well done.

But you see, that leaves another 24 million hogs raised in Iowa each year and some hog-raisers are not at all concerned of the nuisance they've created.

So, on the other side of the coin, there are those rural citizens whose health is damaged by odor, air and water pollution. Some residential properties have been devalued and some have no market for their home in the polluted community.

You see, if there were no people involved there would be no problem, but you know what? These people are Iowans and American citizens, where they have inherited the rights to have all the freedoms they want until they start to effect someone else's freedoms, in other words, your freedom ends where my nose begins.

Midwest agriculture's secret: Dirty river runs beneath it

By JANET KAUFFMAN

The Midwest is flyover country. From 35,000 feet, the landscape is a lovely patchwork of geometric field shapes stitched neatly together. But close up, Midwest farmland is not such a pretty picture.

Farm animals are often packed into factory-size buildings. Next to these are open-air waste pits that hold millions of gallons of untreated liquefied manure.

Just as foul and hidden are underground pipes crisscrossing and draining the watersheds of the Midwest. Pieced together, they're the largest sewer in the country. From Ohio to Iowa, in a network estimated at more than 3 million miles, drain tiles underlie most farm fields to drain away rainwater. But they also carry farmland pollutants directly to creeks and rivers. They are agriculture's dirty secret.

Across southern Michigan



where I live, 19th-century settlers found forests and swamps. Pioneers cut the trees, dug trenches and buried drain tiles, creating underground tributaries.

The word "tiles" comes from the early use of foot-long sections of clay pipe. Now farmers use perforated plastic pipe, laser-sighted downhill.

In the Midwest, tiles drain up to 60 percent of agricultural land. When big confinement dairies were built recently in my watershed, their builders retiled the land where they would dump liquid manure.

In cities, sewers once combined storm water and human waste, creating a serious problem of contaminated overflows. Now, storm water normally drains through one set of pipes, and human waste flows through another.

The tiles cover vast areas. Some tile systems are new, some 100 years old, with fixes from every generation. In many soils, wormholes — more than you might think — and large cracks are direct pathways like straws to subsurface

tiles. Liquids can pour through in minutes.

Across the country, agriculture contributes more pollution to lakes and streams than any other industry. The widely reported dead zone in the Gulf of Mexico is one result of the runoff of excess nutrients from manure and fertilizers. And now another is forming where streams in my part of Michigan flow — in Lake Erie, which had finally recovered from the industrial pollution of the mid-20th century.

In large livestock confinements, animals are never on pasture where they would be spread out feeding on grass and living soil could use and absorb their drier manure. Instead, waste is liquefied, pumped to a lagoon, then sprayed untreated on fields where it runs into the tile drains. The liquefying is done with groundwater — it's polluted coming and going.

It is time to fix the plumbing.

JANET KAUFFMAN has restored wetlands on her farm in Michigan. She wrote this for the Prairie Writers Circle at the Land Institute, Salina, Kan.

From The Desk Of

RON BRADA
345 LINCOLN AVENUE
IOWA FALLS, IOWA 50126
PHONE: 641-648-5314

RECEIVED
MAR 09 2004
Director's Office

March 6, 2004

Dear Jeff Vank.

I was at the DNR mtg at Mason City.

I was surprised at the turnout numbers.

I also thought the DNR people in charge ~~did~~
did a good job there.

I remain in favor of the DNR's recommendation
of 15 PPB on Hydrogen Sulfide! And I'm with
you all the way on pushing for meaningful
air quality standards.

Respectfully,

Ron Brada

March 9, 2004

Bryan Bunton, Iowa DNR-Air Quality Bureau
7900 Hickman Rd
Urbandale, IA 50322

Bryan Bunton:

I attended the DNR air quality meeting in Atlantic a couple of weeks ago, and I did not speak, so I felt that I should write to you on what my opinion is concerning the 15 ppb standard that is being tried into law

This standard is too strict. The current law is 75 ppb, and DNR wants to magnify this standard making it five times stricter than the current standard. This is ridiculous. I believe in standards, but I don't believe in running agriculture out of the state of Iowa. I want clean air also because I breathe the same air that the people that are trying to change it do. The DNR need to stop listening to the extremist groups and the people that give DNR money to try and run agriculture out of Iowa. It's real simple. Base your actions on sound science and in-depth research. This new standard is not based on either one of these

In closing I strongly oppose the new standard of 15 ppb, and I would strongly suggest and urge DNR to throw out this ruling as you have done in the past. Thank you for your time.

Justin Dammann

Science. I feel that the joint University Study is sound science.

Producers also stated at that meeting that we should leave the state if we don't like their operations. They make the choice to run these operations but we have not made the choice to live next to them. They pollute our air and have devalued our property and they make lots of money with no regard for their neighbors. It is only common sense that they should finally have someone keeping track of what they are putting into our environment. I think every much for taking the time to hear my comments.

Paul & Erika Troyna

RECEIVED

MAR 09 2004

Mr. Burton -

I am writing to express my support for the proposed hydrogen sulfide standard of 15 parts per billion (one hour average). I also support an ammonia and odor standard as recommended in the joint University air quality study.

I recently attended the public hearing in Marion City and was very discouraged to hear so many producers portray those of us who support regulations as the enemy. This is not the case at all we just want them to have safe standards like any other industry. They keep saying we shouldn't do anything until we have sound

From: "D&R Feed Inc." <drfeed@netins.net>
To: <bryan.bunton@dnr.state.ia.us>
Date: 3/10/04 1:29PM
Subject: Re: Air Quality Rule for Hydrogen Sulfide

Dear Mr. Bunton:

I am writing to you in response to proposed rule for hydrogen sulfide. I am a farmer from Iowa County. I have farmed for 35 years and wish to continue to make my living through agriculture. I believe the proposed air quality rule for Hydrogen Sulfide is too restrictive and I would like to see the DNR reconsider their proposal.

Specifically, I am disappointed that the DNR has proceeded to develop the rule that is the same as the nullified one from last year. The legislature said that the 15 ppb standard was too restrictive, why would you come back with the same number? I would like to see the DNR reconsider their proposal and to develop a Hydrogen Sulfide standard after the field study is completed and only if the field study determines there is a health impact from CAFOs.

Sincerely,

Delmar Bayer

Dear Mr. Bunton,

March 8, 2004

I am a 28-year-old farmer and it is all I have ever wanted to do. Someday I hope to take over the turkey operation that I currently work at. However, the proposed regulation the Department of Natural Resources is trying to impose is unrealistic. The 15 ppb of hydrogen sulfide is absurd. A more acceptable number is 30 ppb that the Center of Disease Control has found to be safe. It is my belief that the livestock industry will slowly die due to the younger guys, like myself, who will not want to follow or be able to afford such stringent rules.

My question is where are you going to measure this? Will it be 100 yards from the livestock operations or at the neighbor's house where the so-called health problems might be? Why is it that agriculture is always being attacked? What about the other businesses, shouldn't they be regulated the same? I have smelled sewage treatment plants that were worse smelling than the foulest manure I have ever hauled.

Just remember that farming is not only our way of making a living, it is also our livelihood as well.

Thank you for taking the time to read my letter.

Tye W. Rinner
Washington, Iowa

RECEIVED
MAR 10 2004

3/9/2004

Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Heckman Road, Suite 1
Urbandale, Iowa 50322

RE: Air Quality Rule for Hydrogen Sulfide

Dear Mr. Bunton:

I am a farmer from Greene County and have in the past produced pork in a confinement facility for twenty years. Livestock production of all types and sizes is important for the well being of our rural communities. It's apparent to me when listening to and discussing proposed regulation such as the hydrogen sulfide with opponents of CAFO's that the elimination of these livestock production means is actually the goal. A scientific basis for the addressing of air quality is less

the issue that is an attack
on the means of production. I
urge to carefully consider and
reconsider the probable outcome
of a too stringent air quality
standard which targets only
livestock agriculture. Thank you.

Sincerely,
James H. Liese
2171 Neola Ave
Jefferson, La 70129

RECEIVED

MAR 11 2004

3125 130th St
Charles City, IA 50616
March 8, 2004

Bryan Bunton
Air Quality Control
7900 Hickman Road, Suite 1
Urbandale, IA 50322

Dear Bryan,

We attended the Mason City Public Hearing on March 3, but decided to write you this letter instead of requesting to speak that night.

We feel that air quality standards for factory farms are imperative. We live across the road from 4000 hogs (we were here first) and know on a daily basis the unpleasantness of smelling that stench. We've read the U of IA and IA State study report and are very concerned about the ammonia and hydrogen sulfide we breathe each day. Our quality of life since 2001, when this unit was built, has diminished. We built a pond in 1979 and enjoyed fishing, swimming, picnicing, etc. That is no longer possible. Our son and family wanted to build a house on some of our acres - that's no longer possible either. We also know that our acreage is non-saleable because our neighbors put theirs on the market last winter and when interested buyers found out where it was, they cancelled their appointments to look at it.

We have been requesting help out here for going on 3 years now and every time we think some standards will be set, the Farm Bureau (of which we WERE members until then) and large hog producers sabotage the efforts: example: after all the work some legislators did a year ago to help us, it all was scrapped and we are back to square one again. We have called DNR numerous times to report unbearable conditions.

Our family is not against livestock at all - we have a small cow/calf herd. We DO FEEL something has to be done and fast before we have a water and air pollution problem so big it will take millions of dollars and decades to fix.

Every single CAFO should be monitored and rules enforced to make them comply - NO EXCEPTIONS AND NO GRACE PERIOD!

Sincerely,

Leon Isakson
Marilyn Isakson

Leon and Marilyn Isakson

P.S. Have you read Tom Montag's book entitled, "Curlew - Home?" (Palo Alto county) He makes a profound statement about what has happened in this beautiful state. He also asks "Why."

RECEIVED

MAR 10 2004

March 5, 2004

Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, Iowa 50322

Re: Air Quality Standard for Hydrogen Sulfide

Dear Mr. Bunton:

I would like to provide public comments for the proposed air quality standard for hydrogen sulfide.

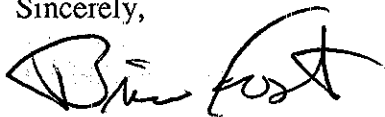
It is very important to base all regulations on science. It is also important that any **air quality standards follow the guidelines that are presented by federal government data, such as Agency for Toxic Substances and Disease Registry (ATSDR)**. This data is used as a screening tool to protect the most sensitive individuals.

The monitoring of hydrogen sulfide conducted by the Iowa DNR at various distances from the farming operation has shown that animal production can create short-term exposure of hydrogen sulfide. The ATSDR indicates that short-term exposure of hydrogen sulfide causes a health risk at 70 ppb. **Based on the federal ATSDR level, I don't believe that the department is able to justify 15 ppb as the public health level.**

In addition, our own **Iowa State University has distanced itself from the original joint ISU-University of Iowa study** that is the basis for DNR's use of 15 ppb as a baseline exposure level. Catherine E. Woteki, Dean of ISU's College of Agriculture has proposed 30 ppb for hydrogen sulfide as an appropriate concentration for long-term exposure, based on new data since the Iowa Concentrated Animal Feeding Operation Air Quality Study was released in February of 2002.

Finally, since state law requires enforcement at the separated distance, **I encourage the Iowa DNR to monitor at the neighbors residence**. Iowa farmers have worked diligently to minimize emissions to protect our own families. As a result of being a heavily regulated business, we have maintained separation distances from neighbors as required by state law.

Sincerely,



Brian Foster
304 First Ave., SE
Hampton, IA 50441

RECEIVED

MAR 10 2004

From: Virginia Soelberg <soelbergv@dwx.com>
To: <Bryan Bunton@dnr.state.ia.us>
Date: 3/11/04 10:19AM
Subject: stinky air

The following is a copy of an email I sent to my legislators. I would like it passed on to the hearings to tell the DNR we want them to set air quality standards for factory farms V. Soelberg

Dear
It isn't just stinky, it is a health risk!!

Now is the time to make a difference in the quality of life for Iowans. As I have biked across Iowa on RAGBRAI, there are times when the stench is unbearable, but I can keep on biking. Those who live near huge confined animal operations must put up with not only the odor, but also the health risks that exist, on a continuing basis

The bill before you now (in the Senate the bill number is S.F. 2267, and in the House, the number is H.F. 2523) is a serious threat to the DNR's ability to protect the public health of all Iowans, and especially people who live near CAFOs

We keep talking about the drain of our young people. My son, who works for the U of Washington in Seattle, comes back to bike with me on RAGBRAI. Clean air is one of the basic expectations one has for their environment, and we aren't making a good impression on people considering moving here. Hydrogen sulfide and ammonia emissions are the prime components of the odor problem and they create serious health threats to people who breathe (that's all of us!) and who are at risk of respiratory health problems

The DNR needs to be able to set standards for pollutants for mercury and sulfur dioxide, for example.

The hydrogen sulfide standard should not be lowered from what the DNR recommended last year.

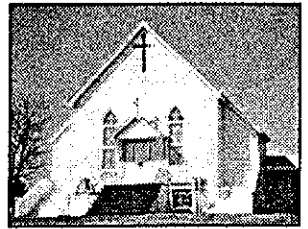
The ammonia standard should not be lowered from the DNR recommendations

This proposed legislation would result in incredibly lenient air quality standards, long-delays in implementation and rule-making, and limiting the DNR on many forms of air pollution. Now is the time to be proactive in protecting Iowa's air quality. I expect your support of clean air

Sincerely,
Virginia H Soelberg
5979 Dogwood Circle
Johnston, Iowa 50131
515-253-0232
soelbergv@dwx.com



**Boone & Polk County Big Creek
Environmental Protection Group**



March 11 2004

I support the DNR's proposed H_2S_2 standard of 15 ppb ^{1° ave} that was recommended in the joint University Study.

I would like to quote some information ~~received this past Monday~~ ^{from} Dr. David Ostenberg, associate clinical professor, department of occupational & Environmental Health University of Iowa. "Minnesota Department of Health, passed a sub-chronic (3 month ave) Inhalation Health Risk Value for H_2S_2 approximately 7 ppb. This is less than the proposed Iowa Standard. This standard is to be measured at the receptor rather than the emitter's property line. The Minn. Dept of public health adopted the health risk value without public hearing & without opposition.

In addition the state addressed
air quality issues from CA402
by requiring each facility w/ 1000
animal units to include an
air emission plan in its water
quality permit.

Thank you

Cyndi Punggenberg R.N., B.S.N.,

2323 ~~290~~th St

Kelley Iowa 50134

515-769-2458

cdrpr@huxcomm.net

Karl Strobel Ex Cattle 3/11/04
Feeder In Favor of Legislation

EPA, DNR, City of Des Moines
Shut Down Mon Fort 7-8 years
ago. 2 Years Ago Ackley Foods
Left Iowa If had been a source
of Feed For Me. 2 years Ago livestock
bill passed. I decided to leave
Cattle Feeding. With No Iowa
Market For Cattle and the feed supply
Reduced. Excessive Regulation along
with the further threat of ~~more~~
additional Regulations. Caused Me
to give up completely on Livestock
In Iowa.

Gone are 2 full time jobs
with good pay and excellent benefits
including PCBS Alliant Select, ~~Health~~
Housing, Meat and a Vehicle. The
hardest thing I've ever done was
to tell Mr. Feedlot ~~Manager~~ Manager
68 years old ~~that~~ that had been working
for us for 39 years, since I was ~~6~~
5 years old that I was no longer
going to have a job for him.

I am also currently on the Pine Lake
Ethanol Plant Board of Directors.
State & local tax incentives will
total at least \$100,000 per Job Created.

**Brown, Winick, Graves, Gross,
Baskerville and Schoenebaum, P.L.C.**
ATTORNEYS AT LAW

666 GRAND AVENUE, SUITE 2000
DES MOINES IOWA 50309-2510

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Pella, Iowa
Washington, D.C.

Michael R. Blaser

Writer's Direct Dial No
(515) 242-2480

Writer's E-Mail Address
blaser@ialawyers.com

March 11, 2004

Via Facsimile

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322
Facsimile No. 242-5094

Dear Mr. Bunton:

This letter is sent in response to the request for public comment by the Iowa Department of Natural Resources (IDNR) as to proposed administrative rules as set forth in item ARC 3092B in the Iowa Administrative Bulletin dated January 7, 2004.

The undersigned represents livestock operations in the state of Iowa, of differing sizes up to and including some of the largest such operations in the state. The "health effects value" (HEV) and "health effect standard" (HES) proposed, if adopted, may have a material and adverse economic impact on the clients I represent and on the economy of the state of Iowa, with no corresponding health benefit to Iowans. For the reasons stated in this letter, I urge the IDNR to amend the proposed rules to bring them into conformity with sound science, and to cease making unsupported claims that exposure to 15 parts per billion (ppb) of hydrogen sulfide for 1 hour poses a "health risk" to anyone, even asthmatic children.

The Proposed HEV/HES Are Not Health Standards and Should be Rejected

In support of the proposed rule, the IDNR states the proposed HEV is a level "commonly known to cause a material and verifiable adverse health effect", apparently to have a meaning consistent with a similar phrase used in Iowa Code Section 459.207. Similarly, the IDNR states the proposed HES is the "trigger" that, if exceeded, authorizes the IDNR to initiate plans and programs to "mitigate emissions". The IDNR also states that it proposes to establish the HEV of 15 ppb of hydrogen sulfide "based on commonly known and accepted health risk data".

In layman's terms, the IDNR claims that public health authorities generally agree that neighbors of livestock farms exposed for one hour to an average of 15 ppb or more of hydrogen sulfide will have their health materially and adversely affected (or, as less subtly stated by the IDNR, the

Mr Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
March 11, 2004
Page 2

neighbors will be exposed to "harmful concentrations of hydrogen sulfide"). However, despite what the IDNR states is a known material and adverse effect on health created by just one hour of exposure at 15 ppb, the IDNR for some inexplicable reason will not initiate a regulatory program until it finds at least 8 hours of exposure at this level in a calendar year. The inconsistency of the IDNR's HEV and HES definitions is perplexing, to say the least, if the public's health is at stake (which, as discussed below, the IDNR must know is not the case at the HEV or HES levels it proposes).

According to the IDNR, the HEV and the HES are based on and consistent with the recommendations in the joint University of Iowa – Iowa State University literature review (Joint Review). However, the IDNR fails to mention in any of its information in support of the proposed HEV and HES the information learned and events that have transpired since the Joint Review was completed and submitted, as if they did not occur or simply are irrelevant to the public and the EPC. This new information and events include:

1. The Joint Review recommendations were based on a number of key policy and scientific assumptions that are now either: (a) known to be wrong or (b) known to be more relevant, based on the language in Senate File 2293 that is now Iowa Code Section 459.207. For example:
 - a. On page 171 of the Joint Review, the authors of Chapter 8, including Dr. Thorne from the U of I, state "while ATSDR guidelines *are not generally applicable and enforceable ambient standards*, their focus is on protection of the public, including sensitive individuals, and thus they are *relevant* to the situation under consideration here".
 - b. On page 172 of the Joint Review, the authors state that the ATSDR standards for hydrogen sulfide "would be appropriate for those living adjacent to CAFOs".
 - c. On pages 174-175 of the Joint Review, the authors state that whether the effect of combined exposure to hydrogen sulfide and ammonia in a community setting should require the use of an "additive effect" is "not immediately clear but certainly possible", and, more directly in conflict with the IDNR claim that its proposed the HEV of 15 ppb of hydrogen sulfide is "based on commonly known and accepted health risk data", the Joint Review states "Unfortunately, available research does not allow quantitative assessment of the health effects of all mixtures of the substances in CAFO emissions". Further, on page 176, the authors clearly state that there is "no

published literature on dose-response of CAFO emissions and life quality or chronic health effects among community residents ”

- d Lacking any health risk data or research on CAFOs, the Joint Review authors turned instead to public health recommendations, including ATSDR’s minimum risk level (MRL) screening recommendations. See, Section 8.7 of the Joint Review, beginning on page 176. The authors specifically endorsed the ATSDR MRL’s for hydrogen sulfide and ammonia.
 - e. Lacking any research or data, the Joint Review authors “assumed” that hydrogen sulfide and ammonia would be present in emissions as a “binary” mixture – that is – both substances being present at the same time in equal amounts. See page 8 of the Joint Review.
 - f Lacking any research or data, the Joint Review authors further “assumed” that neighbors are exposed to hydrogen sulfide and ammonia on a “chronic” basis rather than on an “acute” basis and that “exposures are recurring and may persist for days with each episode”. See page 8 of the Joint Review
- 2 Senate File 2293, enacted **after** the release of the Joint Review, established the “*material and verifiable* adverse health effect” standard now found in Iowa Code Section 459.207 – the Code Section that the proposed rules are required to implement. The authors of the Joint Review were not asked to develop recommendations against this standard, instead, they were asked their *opinion* in question 2 of the joint letter from the Governor and Director Vonk as to whether, based on the available research, any substances should be “regulated to protect the public” – a much more open question. The answer, on page 7 of the Joint Review, was that hydrogen sulfide and ammonia “have been measured in the general vicinity of livestock operations at concentrations of *potential health concern* for rural residents, *under prolonged exposure*”, and, therefore, should be regulated

The chasm between a “potential health concern” and determining that a “material and verifiable adverse health effect” is actually occurring is very wide indeed. The IDNR’s statement that the Joint Review recommended standard of 15 ppb for 1 hour should be the HEV because that standard is “based on commonly known and accepted health risk data” is undeniably false – there is simply no such health risk data on which to base the proposed HEV, even in the Joint Study.

3. The first key assumption in the Joint Study -- that hydrogen sulfide and ammonia are present as a "binary mixture" at a neighbor's residence -- thereby necessitating a reduction of standards to address the unproven but theoretically possible "additive" or "synergistic" effect of the two gases -- has now been proven to be unsupported by the IDNR's own monitoring of the state's largest CAFOs.
4. The second key assumption in the Joint Study -- that neighbors are exposed for "chronic periods" (15-365 consecutive days) or even for "reoccurring exposures that may persist for days with each episode", also does not find support in the IDNR's monitoring results of the state's largest CAFOs and therefore was also, as we now know, in error.
5. Recognizing the irrefutable facts set forth above, particularly the invalidity of certain key assumptions, Iowa State University has abandoned its support of the recommendations in the Joint Review. However, rather than accept the fact the Joint Review recommendations are based on erroneous assumptions, and are therefore inherently flawed, the IDNR and the U of I have desperately clung to them (well, not the ammonia recommendations, which were quietly put on the shelf for the time being in part because the recommended level was so low that background levels of ammonia from multiple natural and man-made sources in much of Iowa approach it from time to time and therefore ammonia could not clearly be "blamed" on nearby livestock operations).

In addition, certain groups supporting the IDNR's proposed rule have unfairly and without any basis publicly disparaged Iowa State University as having caved into "pressure from interest groups". As discussed below, it is more likely that the IDNR has simply decided that science doesn't really matter anymore, because "the public" demands action. One has to believe the IDNR does understand that the proposed HEV and HES utterly fail to meet the only test that matters at this point in time -- they are not levels "commonly known to cause a material and verifiable adverse health effect", as required by Iowa law.

6. Despite the proposed rule being the subject of one of the most intensive public health debates in Iowa in recent years, the Iowa Department of Public Health has been (understandably, for its own credibility) completely absent from the debate, allowing the IDNR, which has no health experts on its staff, to lead on this important issue.

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
March 11, 2004
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If the proposed misnamed “health” effects value and “health” effects standard are not, in fact, a health value or health standard, why are they being pursued and defended with such vigor by the U of I and the IDNR? A recent series of public statements by IDNR and U of I officials provides the answer. In an article published in the *Des Moines Register* last week on pending legislative efforts to adopt the ATSDR standards as air quality health standards for neighbors of livestock facilities, IDNR Environmental Protection chief Wayne Gieselman was quoted as saying the ATSDR limits were “too lenient ... in fact ... no Iowa livestock producer would violate the limits, based on monitoring in recent months” In a strikingly similar statement, Dr. Thorne from the U of I was quoted in the March 9 *Register* saying the ATSDR standards are “so permissive that even the heaviest polluting livestock operations in the nation would likely not exceed these exposure limits”.

Based on these public statements, it is clear that the IDNR and the U of I are not pursuing a standard of 15 ppb of hydrogen sulfide for 1 hour a year as being protective of public health – instead, they clearly view the goal of the standards as arriving at a level that is low enough that “violations” of the standards will likely occur, which would allow the IDNR to trigger plans and programs and make producers spend money to “protect the public health” – the terms under which the IDNR has chosen to frame the debate. After all, who can be against public health? As the IDNR has publicly made very clear to the Iowa Environmental Protection Commission (EPC) and to industry groups, once the “public health” is at stake, the IDNR is prohibited from considering any cost/benefit analysis in coming up with its emission reduction plans and programs.

Having worked closely with the IDNR over the last 10 years on a number of livestock issues and having a high degree of respect for the integrity with which IDNR administrators have previously approached controversial issues, it is both disappointing and disturbing that politics, not science, has taken precedence in this rulemaking. On behalf of my clients, I urge the IDNR and the EPC to adopt a health standard based on actual generally accepted public health standards, not based on opinion polls or the posture of the *Register's* editorial board. Among the most restrictive generally accepted standards are the ATSDR standards, the very standards endorsed in the Joint Review. The proposed HEV and HES standards should be rejected by the EPC, and ATSDR standards should be considered instead.

The HEV Rule Includes Improper References to Air Pollution Control Programs

Proposed Chapter 32, in its title and in section 32 2(2), reference the IDNR adopting “additional air pollution controls” if the HES is exceeded. This statement implies that any violation of the HES by any producer can trigger the development of plans and programs and that these programs can include “air pollution controls”.

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First, it is unclear if the IDNR believes that once plans or programs are adopted, they can be mandated on all producers or on producers utilizing a similar type of facility, regardless of whether that individual producer or facility has been found in violation of the HEV. Some IDNR staff have previously indicated that they believe they can mandate controls on a facility if a similar facility did violate the standard. However, Iowa Code Section 459.207 clearly requires all violations be enforced by "investigating to trace the source" of the pollutant, which would *not* allow IDNR to mandate controls on a producer or facility that has not been demonstrated to have violated the standard. This is a critical issue not addressed in the discussion of the rule and should be fully vetted by IDNR staff with the EPC and with the public before the EPC would take any further action on the proposed rules

Second, it is unclear how the HEV and HES would be implemented after plans and programs are developed. For example, assume a facility would be determined to violate the HEV, but not the HES, such as exceeding the HEV 3 times in a year. Is it the IDNR's position that "air pollution controls included in comprehensive plans and programs", as stated in the rule, can be imposed based on a single violation of the HEV? Does the HES have to be violated for plans or programs to be recommended, or is the HES simply viewed by the IDNR as the "trigger" for plans and programs and has no meaning after plans and programs are triggered? Again, this critical issue should be clarified by the IDNR staff for the EPC and the public.

Third, the law states that all best management practices, mechanisms, processes or infrastructure under plans and programs are to be "recommended" by the IDNR. The use of the term "air pollution controls" implies that the IDNR plans and programs will consist of requirements mandated for producers to follow, not recommendations that they can consider and choose from. The IDNR should clarify its intention and apprise the EPC and the regulated industry of its intentions.

Monitoring Sites are to be AT Separated Locations, Not 300 Meters Away and Closer

The IDNR now acknowledges that monitoring locations for purposes of the field study should be at separated locations, not at the fenceline of the livestock facility, if the data from the monitors is to have any use in determining, as required by Iowa law, "to a reasonable degree of scientific certainty . . . airborne pollutants . . . are present at a separated location at levels commonly known to cause a material and verifiable adverse health effect".

As the EPC is aware, there has been a lengthy discussion as to how and where to locate monitors relative to a neighbor's house and relative to the livestock facility or facilities being monitored. Though the law clearly requires monitoring "at" the separated location, and a separated location

Mr. Bryan Bunton
Iowa Department of Natural Resources
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is, for example, a house, and not a yard or field surrounding the house, the regulated industry has readily acknowledged that if this requirement were taken literally, monitoring would not be reliable due to the effect of air dispersion near the house. However, it is also clear that the reason the Legislature adopted and Governor signed a law that requires monitoring "at the separated location" is because producers were required to construct a minimum distance from neighbors, and it would not be fair to producers to find violations in open space closer to the facility than the facility was allowed to be in relation to the neighbors.

Subpart I of the proposed "Iowa Ambient Air Sampling Manual" (Manual) would permit the IDNR to place monitors 300 meters (approximately 900 feet) away from the separated location in any direction, including placement closer to the livestock facility and even inside of the separation distance the producer was required to adhere to when the facility was constructed. For example, a 5,000 head hog finishing facility with an anaerobic lagoon could have been constructed in 1996 with a minimum distance from the lagoon to the nearest neighbor of 1,875 feet. Assume the producer exceeded the requirement by 20% and placed the lagoon 2,250 feet away. Under the IDNR proposal in the Manual, the monitor could be placed as close as 1,350 feet away from the lagoon, 525 feet inside the required separation distance that the producer had to follow. This provision of the Manual must be changed to prohibit this result.

Readings Within the Margin of Error Should be Disregarded

The Manual provides that at 95% probability limits, the accuracy for hydrogen sulfide monitoring should be +/- 20%. The Manual does not rule out using data below or the above the HEV but within the accuracy margin of error. This means that a reading of 16 ppb for an hour might really be a reading of 12-13 ppb. The Manual should be modified to prevent the use of any data with the monitor's margin of error.

Thank you for the opportunity to present these comments to you.

Sincerely,



Mike Blaser

cc: Affected Clients
EPC Members

3/11/04

My name is Dave Deyoe. I operate a family hog operation near Nevada, Iowa.

When I started thinking about coming here, I decided to do some of my own research. I ended up on a website for the "Agency for Toxic Substances and Disease Registry" (ATSDR) a division of the CDC, one particular line caught my eye. Keep in mind we are talking about a DNR proposed of 15 ppb. Here is the quote: "Your body makes small amounts of hydrogen sulfide. In the mouth, air levels between 1 and 100 parts of hydrogen sulfide per billion parts of air have been found." I did brush my teeth before coming here, so I hope I'm not exceeding the limit. If people can produce hydrogen sulfide in amounts exceeding 15 ppb in their mouths, I'm skeptical about the health risks.

The ATSDR also says, "The average levels recorded in intestinal gas have been between 1 and 4 parts per million. That's approximately 100 times the DNR's proposal. You can draw your own conclusions.

If we set the hydrogen sulfide level at 15 PPB, I believe it would send a false message to Iowans that this is a necessary level to protect public health. Most people are not aware they are producing a higher level in their own bodies.

I also found many web sites from around the world touting the healthful benefits of hydrogen sulfide found in hot spring mineral baths. In fact, if you go to the Thermopolis, Wyoming Chamber of Commerce website, they invite people to "visit and play in the hot mineral springs all year long", where they boast the hydrogen sulfide level is 4500 ppb.

I will not deny that the odor of hydrogen sulfide can be annoying, but is ^{it} really a health risk at very low levels?

15 ppb is not ^{only not} sound science, and it's not common sense.

February 22, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road
Urbandale, IA 50322

Dear Mr. Bunton:

I am writing this letter in response to the DNR's air quality standards on 15 ppb for Hydrogen Sulfide. I feel the DNR's position on this issue is way off base. I feel your recommendations are not based on science and are far too conservative for livestock production in our state.

I am also aware that the same recommendations of 15 ppb were rejected in the legislature last year.

I have been in livestock production my entire life. It disappoints me when I think how dedicated I am in the livestock business on protecting the environment in this state to have one of the states top regulating agencies come out with this type of proposal with the total lack of science behind it.

It is vital to for every Iowan to have the environment necessary to maintain a high quality of life and I truly believe in this. I also feel much has been done already to ensure this.

In closing I feel that if the recommendations the DNR are expressing to become the standard of 15 ppb, that livestock production will eventually be forced from this state.

Sincerely,



Dale Pudenz
2413 Sunset Drive
Iowa Falls, IA 50126

RECEIVED

MAR 11 2004

March 10, 2004

Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, Iowa 50322

Re: Air Quality Rule for Hydrogen Sulfide

Dear Mr. Bunton:

I am writing to you about the proposed rule for hydrogen sulfide. I am a resident of a rural county. I believe the proposed air quality rule for hydrogen sulfide is too restrictive and I would like to see the DNR reconsider their proposal.

I wonder why the DNR has proceeded to develop the same rule that was nullified last year? The legislature said that the 15 parts per billion standard was too restrictive, so why would you come back with the same number? Are you trying to prove a problem exists rather than determining if there is an actual health impact? Also, I have read that Iowa State University no longer supports the 15 ppb standard because research shows that the assumption made by the joint university task force was wrong. The department should listen to the scientists who are conducting actual field measurements and not pseudoscience behind parts of the joint university recommendation.

Also, I would like to see the DNR continue its field measurements by following the law and measuring only where people reside. Enough assumptions were made by the joint university task force report. We don't need more assumptions by the DNR.

Sincerely,



Sandra Johnson
2165 360th St.
Earlham, IA 50072

RECEIVED

MAR 11 2004

March 8, 2004

Byran Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road
Urbandale, IA 50322

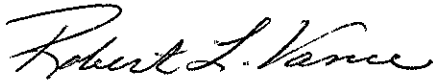
Dear Mr Bunton:

This is the first time I have ever provided public comment to the Iowa Department of Natural Resources. Your proposed air quality standard of 15 ppb for Hydrogen Sulfide is not consistent with even the most conservative levels established by the U.S. Centers for Disease Control. The Centers for Disease Control have set levels of 30 ppb for up to 365 days per year without health risk. I do not understand how you can possibly create a standard for our industry, that could potentially put thousands of Iowan's out of work, without first conducting a thorough study to determine if there is a public health problem, especially a standard as stringent as this seems to be.

From what I have learned, the IDNR is not monitoring air quality at the location designated by Iowa law – at the neighbor's residence. How will we know if the neighbors are impacted if you do not take measurements at their home? I also do not understand the proposed exposure level standard. Once again, this level is not based on science and should be revised. It seems to me that a message is being sent out that there is a critical public health issue being solved by setting this standard, but there is not. What is the underlying purpose of this arbitrary standard ???

It is important to all of us to have good air quality in Iowa. I will support air quality rules for livestock production if the study is completed in compliance with Iowa law and the standards are developed with the support of solid science.

Sincerely,



Bob Vance

RECEIVED

MAR 12 2004

March 8, 2004

Byran Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road
Urbandale, IA 50322

Dear Mr. Bunton:

This letter is in response to the IDNR's proposed hydrogen sulfide rule for livestock production. I do not support the 15 ppb standard, as it is not based on science. It is not even consistent with the U.S. Centers for Disease Control standards. As a livestock producer, I encourage you to reconsider the proposed standard.

Livestock production is important to the State of Iowa and I am disappointed in your actions to unfairly regulate agriculture. The proposed standard is not consistent with the University Report and the proposed duration exposure level is far too conservative. In addition, you have been monitoring at locations other than the neighbor's residence near their home, as required by law. How will we truly know in what ways the neighbors are impacted if you do not take the measurements at their home?

It is important to all of us to have good air quality in Iowa and I would support air quality rules for livestock production, if the study is completed in compliance with Iowa law and if the standards are developed with the support of scientific evidence. Please conduct the monitoring study, determine if a problem exists and then base the standards on good science, not activist group pressure or the agenda of activist university professors.

Sincerely,



Jon Moberg

RECEIVED

MAR 12 2004

3150 INDIAN POINT DRIVE
SUN VALLEY LAKE
ELLSTON, IA 50074

Dear Editor,

We live in a state where even though we know it is immoral to poison your neighbor, it is not illegal.

There are hundreds of studies that have been done on the effects of CAFO's on people and animals over the last 45 years. Ironically, because some studies to set human limits for gases were done on pigs, we know that animals are susceptible to the same diseases from CAFO's as people. There may be an argument about the science of those studies, but there can be no argument about the government's studies culling hospital records, pre- and post-CAFO introduction into a community, which show clearly a tripling of those illnesses generally associated with exposure to hydrogen-sulfide and ammonia. Add to that, records which show human mortality from hydrogen-sulfide four times higher in agriculture than in the wastewater industry, and a need for public health protection from CAFO's becomes obvious.

In logic, there is an argument: if $a=b$ and $b=c$, then $a=c$. If CAFO's and sewer pipes both are closed structures, if they both have fecal waste in them generating the poison gases hydrogen-sulfide and ammonia, if the diseases and deaths from those gasses are the same, if you need constant ventilation to survive in either of them, then CAFO's and sewer pipes are the same. You are essentially eating pork raised in a sewer, and neighbors of CAFO's are living next to an unregulated poison producing technology.

In every sector in America where these conditions exist, except in agriculture, the controlling laws are the federal 'Confined Spaces Regulations'. Since these federal laws already exist, the DNR need only adopt them to protect people in the agricultural/rural sector in Iowa.

Knowing what we know about the dangers associated with sewer pipes and CAFO's, it is unconscionable for opponents of 'air-quality regulation' to take a stance which results in effectively blocking regulations that are to protect the public's health in relation to CAFO's in agriculture.

Bob Watson
2736 Lannon Hill Rd
Decorah, IA 52101
563-382-5848

From: Phyllis J Mains <pmains@juno.com>
To: <Bryan.Bunton@dnr.state.ia.us>
Date: 3/13/04 2:46PM
Subject: Hydrogen Sulfide standards

Dear Mr. Bunton,

We agree with the proposed hydrogen sulfide standard of 15ppb (one hour average) as recommended in the joint Iowa/Iowa State study completed two years ago. The World Health Organization only recommends 5ppb but 15ppb would only adversely affect health of 22 % of humans. Our family lives in rural Iowa and we should not have to suffer from factory farm pollution.

We also support the Joint University study for ammonia and odor standards for factory farms.

Family farms are suffering from special interest protections for factory farms. Some years profits from our 80 acre farms barely made enough money to pay for our health insurance. We should not have to suffer the health risks from the factory farms around us.

Thank you for your consideration.

Sincerely,
Michael and Phyllis Mains
PO Box 169
Van Wert, IA 50262

The best thing to hit the Internet in years - Juno SpeedBand!
Surf the Web up to FIVE TIMES FASTER!
Only \$14.95/ month - visit www.juno.com to sign up today!

From: "Arlyn Van Zante" <arlvanz@netins.net>
To: <bryan.bunton@dnr.state.ia.us>
Date: 3/14/04 9:39PM
Subject: air quality standards

As a farmer I am deeply concerned about the quality of the air we breathe and water we drink. We as farmers are the ones who will be first affected if we are creating hazards to human health.

I do believe any new regulations should be based on sound science and not on emotion or non-verifiable and exaggerated claims by special interest groups who want to move livestock out of Iowa.

The center for Disease Control has set a standard of 70 ppb for hydrogen sulfide, which is well below the proven threshold that would pose a human health risk. It only makes sense to use their recommendation rather than 15 ppb, which even a small feedlot operation like mine, could exceed. Adoption of the 15 ppb standard will only accelerate the trend to either larger concentrations of livestock as they would be the only operations able to justify the cost of complying or the industry will move elsewhere. We have already witnessed the disappearance of hog lots which was brought on largely because of excess regulation and adverse publicity aimed at hog lots. As recently as 10 years ago there were 10 hog lots within a 2-mile radius of my farm, now there are only 2 with one changing to a confinement.

It only seems fair to me to locate air monitors no closer than the required separation distances.

Thanks

Arlyn Van Zante

2749 E 132nd St. S.
Grinnell, Iowa 50112

From: "Frank Hemmelrick" <franh@evertek.net>
To: <bryan.bunton@dnr.state.ia.us>
Date: 3/15/04 10:05AM
Subject: clean air for Iowa

Mr. Bryan Bunton,

I support the DNR's proposed hydrogen sulfide standard of 15 parts per billion, one-hour average, that was recommended in the joint University study. This is a good standard that, once enforced, will help protect our health. The DNR must issue a rule based on this standard!

The DNR also must include an ammonia and odor standard as recommended in the joint University air quality study. Iowans need a limit on the amount of ammonia and odors that come out of factory farms!

The DNR must support the joint University air quality study released in February 2002 that states hydrogen sulfide and ammonia have been measured near factory farms in concentrations that could be harmful to humans. This joint study is based on the best science available, compiled by 27 state university professors, and peer-reviewed by eight international and national experts. We have sound science, now we must use it.

Numerous scientific studies document the health effects associated with factory farm air pollution. For the public health of rural Iowans, factory farms must be required to lower the amount of their emissions.

Sincerely,
Frank and Ann Hemmelrick
1320 190th St
Bradgate, IA 50520

From: "Brian Thilges" <briansue@wctatel.net>
To: <bryan.bunton@dnr.state.ia.us>
Date: 3/15/04 12:07PM
Subject: your H2S myths

It is clear to me the DNR is blindly pushing regulation regardless of public input or real science. DNR should propose air emission standards based upon nationally recognized standards that have some scientific basis with reasonable safety factors that apply to all industries. Then the general public and our elected representatives will support your efforts (after they had to overturn them 2 times in the past) Proposing radical regulation will not achieve the goal of cleaner air. Please note as part of the comment record the following statement:

Below is something of scientific fact that we should highly consider using. We can confidently say the odor threshold (8 - 700 ppb) is what the DNR is inappropriately calling a health effect level

According to the 2 sources, adverse H2S health effects do not occur until concentrations reach 5,000 - 20,000 ppb, so let's suggest that's where we begin with regulations---you are off by a factor of 333 - 1,333

I'm opposed to your illegal and blatantly unscientific regulation of H2S at the 15 ppb "health effects" level

Brian Thilges
155-300th Street
Woden, IA 50484

Source:

www.cdc.gov/nasd/docs/d001501-d001600/d001535/d001535.html

CDC, National Ag Safety Database (NASD) Review: April, 2002

PHYSIOLOGICAL RESPONSE OF ADULT HUMANS TO HYDROGEN SULFIDE **

Effect

Concentration Converted from Mg (H2S)/1 Kg (Air)

To PPB

(mg/kg = ppm 10 mg/kg = 10ppm = 10,000ppb

www.palmetto-grass.com/turfmgt/metric.html)

Least Detectable Odor

10 - 700

Offensive Odor

3,000 - 5,000

Eye Irritation

10,000

Irritation Mucous Membranes

and Lungs

20,000

Irritation of Respiratory Tract

50,000 - 100,000

Olfactory Nerve Paralysis

150,000

Headache, Dizziness

200,000

Nausea, Excitement,
Unconsciousness
500,000 - 600,000

Rapidly Fatal
700,000 - 2,000,000

** Source Nordstron, G A.: J.B. McQuilty: "Manure
Gases in the Animal Environment." University of
Alberta - 1976

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The information and recommendations contained in this publication are believed to be reliable and
representative of contemporary expert opinion on the subject material. The Farm Safety Association does
not guarantee absolute accuracy or sufficiency of subject material, nor can it accept responsibility for
health and safety recommendations that may have been omitted due to particular and exceptional
conditions and circumstances.

Source: World Health Organization, 2003

H2S Exposure (ppb), rounded
Effect/Observation
Reference

8
Odor Threshold
Amoore & Haultala, 1983

2,000

Bronchial constriction in asthmatic individuals
Jappinen et al , 1990

3,600

Eye irritation complaints
Vanhoorne et al , 1995

5,000

Increased blood lactate concentration, decreased skeletal muscle citrate synthase activity, decreased oxygen uptake
Bhambhani & Singh, 1991; Bhambhani et al , 1996b, 1997

20,100

Fatigue, loss of appetite, headache, irritability, poor memory, dizziness
Ahlhorg, 1951

101,000

Olfactory paralysis
Hirsch & Zavala, 1999

403,000

Respiratory distress
Spolyar, 1951

503,000

Death
Beauchamp et al , 1984

CC: <catharine.fitzsimmons@dnr.state.ia.us>

From: "Cheryl Christopherson" <dcsmfarm@lvcta.com>
To: <bryan.bunton@dnr.state.ia.us>
Date: 3/15/04 12:35PM
Subject: Clean air

Dear Mr. Bunton,

I am opposed to the new 15 ppb rule that is proposed by the Iowa DNR.

Farmers do care about clean air but control and rules should be based on sound science. Monitoring should be done at separated locations as proposed by the Iowa legislature.

Thank you,
Donald Christopherson
2667 Samson Ave
Duncombe, Ia 50532
dcsmfarm@lvcta.com

From: "Curtis Evans" <evanscurt@wctatel.net>
To: "Bryan Bunton" <bryan.bunton@dnr.state.ia.us>
Date: 3/15/04 1:21PM
Subject: Please protect our air quality

Bryan Bunton
Iowa DNR
Air Quality Bureau
7900 Hickman Road
Urbandale, IA 50322

Dear Mr. Bunton:

I support the DNR's proposed hydrogen sulfide standard of 15 parts per billion, one-hour average, that was recommended in the joint University study. This is a good standard that, once enforced, will help protect our health. The DNR must issue a rule based on this standard!

The DNR also must include an ammonia and odor standard as recommended in the joint University air quality study. Iowans need a limit on the amount of ammonia and odors that come out of factory farms!

The DNR must support the joint University air quality study released in February 2002 that states hydrogen sulfide and ammonia have been measured near factory farms in concentrations that could be harmful to humans. This joint study is based on the best science available, compiled by 27 state university professors, and peer-reviewed by eight international and national experts. We have sound science, now we must use it.

Numerous scientific studies document the health effects associated with factory farm air pollution. For the public health of rural Iowans, factory farms must be required to lower the amount of their emissions.

Sincerely,

Curt Evans
3833 Dogwood Ave
Joice, IA 50446

From: "Jeff Sackett" <jlsackett@iowatelecom net>
To: <bryan.bunton@dnr.state.ia.us>
Date: 3/15/04 5:13PM
Subject: Public Comment

Dear Mr. Bunton,

I support the rules as set forth by the Iowa State- University of Iowa Cafo Air Quality Study at 15 parts per billion for Hydrogen -sulfide.

It shouldn't be the hydrogen-sulfide threshold that bothers the hog farmers. Family farmers would likely not be affected by 15ppb.

What they need to worry about is Factory Farms like Heartland Pork, Swine Graphics, Iowa Select and others taking away there way of life, if they choose not to be part of their vertical integration plan.

It is a shame how Farm Bureau, NPPC, and Iowa Pork Producers Council has brainwashed producers into thinking that they care about them ,when their only concern is the Factory Farm Producers I mentioned above and themselves

Thank you,

Jeff Sackett
2364 170th st.
Menlo, Ia. 50164
641-743-6633
jlsackett@iowatelecom net

From: Clarence Swartz <cswartz1@direcway.com>
To: <bryan.bunton@dnr.state.ia.us>
Date: 3/15/04 10:47AM
Subject: environment

Iowa must have clean air and clean water if Iowa is going to prosper
Clarence Swartz Orient Iowa

March 8, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

Dear Mr. Bunton:

It is very important to everyone to have good air quality. I am a resident of Iowa and am employed as a pork producer in the state of Iowa. Being involved in the livestock business for a great many years and with a urgent desire to continue my livelihood in such I am compelled to voice my dismay at the IDNR's attempt to implement a 15 ppb hydrogen sulfide level.

From the information I have gathered, this new standard would not be supported by any studies previously done at our two universities, or even the United States Center for Disease Control levels.

Historically the IDNR has made well informed, well researched recommendations for Iowa agriculture, but, this looks like putting the cart in front of the horse before collecting "valid" unbiased data.

We all have families and are trying to be good stewards of land and air but let us not cry wolf when one doesn't exists!

Sincerely,

Scott Kraft
107 E 5th St
Riceville, Iowa 50466

RECEIVED

MAR 15 2004

Dear Sir;

I have read a number of articles on this hydrogen sulfide air quality thing. Never has it been written, just what does this do to our health? or what problems have occurred? I have 3 sons, all love farming, so I want to know what are the health problems?

Then why do you only care about farm people, because you are not testing industries or waste water treatment facilities. People do live near those places also, are they not important? does their health mean nothing to you?

OR do you have another motive - like you want to get rid of livestock?

Our governor, thru the Value's added program is spending big money, trying to bring jobs here to Iowa

They just gave \$60,000 to Eden Farms State Center a pork producer who will hire 3 people. They must have a number of confinements to hire 3 workers.

So I wonder how soon will you tell them to shut down, and all that money is wasted.

RECEIVED

MAR 15 2004

Until you really know what health problems occur, don't you think you need to do more research, therefore work on that first?

I believe all places need to be checked, we hear how smelly the Le Mars waste treatment plant is, if you want clean air for Iowa DO SO FOR EVERYONE

Don't just pick on the family farmers who are having enough problems just trying to survive. If there are health problems, help solve these problems, why destroy their living and cause them to leave the farm. This will hurt the state of Iowa, every farmer, every job lost hurts us all.

A concerned mother

Carol Render
3861 Cleveland Ave.
Hawarden, Iowa
51023

RECEIVED

MAR 15 2004

RECEIVED
MAR 15 2004

March 13, 2004

To: Bryan Benton, Air Quality Bureau Ia. DNR

From: Craig Clemons
578 Redwood Rd.
Walnut, Ia 51577, Shelby County

re: Hydrogen Sulfide Standard for Air Quality Study

Dear Sir,

I am writing this letter to express opposition to the DNR's use of 15 ppb hydrogen sulfide standard in their Air Quality Study. Many regulations and restrictions have already been implemented on Iowa's livestock industry. For many livestock producers, the costs to meet the standards of these regulations is becoming overwhelming.

The research used to set this low standard has been questioned concerning its methodology and assumptions made.

Safe, clean air is important to Iowans, so is the livestock industry. Your Department ~~is charged~~ has a tremendous responsibility to oversee and regulate these two concerns. Please act responsibly, there is plenty of research to discredit this low standard. Don't be used by competing agendas. Use sound science to protect Iowans.

Thank You. Craig Clemons

March 12, 2004

Dear Mr. Bunton,

I was unable to stay through the entire hearing, but was given your address to correspond to.

I doubt there was single Farm Bureau scientist attending the DNR public hearing on **Air Quality** in Mason City, March 3rd. Those special interests who attended only attacked the research the U. of Iowa and ISU's have done regarding CAFO's. The Farm Bureau called for "sound science", and claimed the science that has been done on pollution regarding CAFO's (confined animal feeding operations) is flawed. What the Farm Bureau wants is the *sound of silence*, they really don't care about *science*.

The danger of hydrogen sulfide emissions from confinement operations has not been refuted. The Farm Bureau just doesn't want to believe it. They're against anything that restricts what they believe is their inalienable right to pollute, at any cost to others. And they don't seem to care if a neighbor is affected in *any* way. Shouldn't there be legislation to protect the health of Iowa's rural residents and our environment, and fines adequate to cover negligence and harm done?

If they cannot prove that these huge confinement operations cause *no* harm, maybe we need a moratorium until the science can reach the Farm Bureau standard of *sound science*? Just how much would such a study cost? Would a \$1.00/head cover it? That is only 20 million a year for more research. There is no reason the citizens of Iowa should have to foot the bills for more research, or to clean up after these special interests.

Iowa doesn't need to re-invent the wheel. We are *following* the lead of 27 other states who have adopted hydrogen sulfide standards. The notion of the family farm and rural Iowa has changed...just take a drive through country side. Just as the face of agriculture has changed, the cost of doing 'business as usual' has gone up.

I support implementing the Health Effects Standard at 15ppb. However, I find it rather ludicrous that this standard can be exceeded 7 times a year at separate locations. What's the point? What happens after 7 violations? Are they put out of business? Are they fined? What? I would like you to respond.

Sincerely,

Sioux Lawton
1957 Taft Ave.
Garner, Ia. 50438

RECEIVED

MAR 15 2004

March 8, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

Dear Mr. Bunton:

It is very important to everyone to have good air quality. I am a resident of Iowa and am employed as a pork producer. Being involved in the livestock business for a great many years and with a urgent desire to continue my livelihood in such I am compelled to voice my dismay at the IDNR's attempt to implement a 15 ppb hydrogen sulfide level.

From the information I have gathered, this new standard would not be supported by any studies previously done at our two Universities, or even the United States Center for Disease Control levels.

Historically the IDNR has made well informed, well researched recommendations for Iowa agriculture, but, this looks like putting the cart in front of the horse before collecting "valid" unbiased data.

We all have families and are trying to be good stewards of land and air but let us not cry wolf when one doesn't exists!

Sincerely,

Jim Hemann
2695 Elm Ave.
Chester, Ia 52134

RECEIVED

MAR 15 2004

Dear Mr. Bunton,

I do not agree with the proposed regulation of 15 ppb ~~at~~ for an ambient air standard. Farmers are working for a clean environment and I believe this regulation is going to far.

Sincerely,
Brandt Ferry

RECEIVED
MAR 15 2004

March 11, 2004

Dear Sir

I would like Iowa to keep
Hogs - Cattle - Turkeys - and chickens for
many years to feed the people of the
World.

RECEIVED
MAR 15 2004

Leroy A. Larsen
2030 1300th St.
Harlan, Iowa 51537

3-11-04

Dear Mr. Bunton

I am writing to you in response to proposed rule for hydrogen sulfide. I am a farmer from Shelby County. I have farmed for 30 years and would continue to make my living through agriculture. I believe the proposed air quality rule for Hydrogen Sulfide is too restrictive and I would like to see the DNR reconsider their proposal.

Sincerely,

Baylon Smith

931 Dogwood Rd.

Portsmouth, IA. 51565

RECEIVED

MAR 15 2004

To: Bryan Bunton
Iowa Department of Natural Resources

Dear Sir:

I am a farmer from Shelby County. I am writing to you to encourage livestock production in Iowa. The Hydrogen Sulfide regulations proposed are too restrictive and I would like to see the DNR go slow on their process of coming up with a fair and safe standard. Please consider a standard that can be met and only if years of study prove anything is needed at all.

Thank you,
Bryan D. Greve
Walnut, Iowa

RECEIVED

MAR 15 2004

4-11-04

Dear Mr. Burton,

I am writing to express my opinion about the proposed DNR air quality regulations. I am concerned that the regulations are not based on credible data and would drive the livestock industry from Iowa as a grain farmer I need a market for my grain. Please reconsider your proposal

Mike Fara
Shelby County Iowa

RECEIVED

MAR 15 2004

Dear Mr. Bunton:

I support the DNR's proposed hydrogen sulfide standard of 15 parts per billion, one-hour average, that was recommended in the joint University study. This is a good standard that, once enforced, will help protect our health. The DNR must issue a rule based on this standard! The DNR also must include an ammonia and odor standard as recommended in the joint University air quality study. Iowans need a limit on the amount of ammonia and odors that come out of factory farms! The DNR must support the joint University air quality study released in February 2002 that states hydrogen sulfide and ammonia have been measured near factory farms in concentrations that could be harmful to humans. This joint study is based on the best science available, compiled by 27 state university professors, and peer-reviewed by eight international and national experts. We have sound science, now we must use it. Numerous scientific studies document the health effects associated with factory farm air pollution. For the public health of rural Iowans, factory farms must be required to lower the amount of their emissions.

Sincerely,

Rodney G. Schroeter, 411 West Fifth Street, Atlantic, Iowa 50022

[FREE pop-up blocking with the new MSN Toolbar – get it now!](#)

From: "Randy Schon" <randy_schon@hotmail.com>
To: <bryan.bunton@dnr.state.ia.us>
Date: 3/16/04 10:09AM
Subject: standards

I have been involved with a family farm for over 30 years, and just wanted to say that we have nothing to fear from having air quality standards in Iowa. Farm Bureau certainly does not represent most of its members, but rather large confinement interests. We continue to lose young people who leave Iowa because they can not raise pigs themselves, but only work in a confinement, which is certainly not a pleasant job. Furthermore, people who live next to confinements that violate the law should be able to file nuisance lawsuits. We have nothing to fear from air and water quality standards. When farmers oppose environmental rules, it makes it look like we do not care about the environment or our neighbors, but only about money.

Learn how to help protect your privacy and prevent fraud online at Tech Hacks & Scams <http://special.msn.com/msnbc/techsafety.armx>

From: Paul McClintic <skatergp@dwx.com>
To: <bryan.bunton@dnr.state.ia.us>
Date: 3/16/04 1:01PM
Subject: Air Quality Rules

Bryan Bunton
Iowa DNR
Air Quality Bureau
7900 Hickman Road
Urbandale, IA 50322

Dear Mr. Bunton:

Before going to the University of Iowa, I worked as a secretary for the Department of Environmental Quality. It was my impression that DEQ, and now DNR, are supposed to stand up for Iowa's citizens in protecting our environment rather than caving in to special interest groups like Farm Bureau and the factory farm advocates.

I support the DNR's proposed hydrogen sulfide standard of 15 parts per billion, one-hour average, that was recommended in the joint University study. This is a good standard that, once enforced, will help protect our health. The DNR must issue a rule based on this standard!

The DNR also must include an ammonia and odor standard as recommended in the joint University air quality study. Iowans need a limit on the amount of ammonia and odors that come out of factory farms!

The DNR must support the joint University air quality study released in February 2002 that states hydrogen sulfide and ammonia have been measured near factory farms in concentrations that could be harmful to humans. This joint study is based on the best science available, compiled by 27 state university professors, and peer-reviewed by eight international and national experts. We have sound science, now we must use it.

Numerous scientific studies document the health effects associated with factory farm air pollution. For the public health of rural Iowans, factory farms must be required to lower the amount of their emissions.

I'm now a teacher residing in Stuart, Iowa. My husband and I were extremely worried when factory farms tried to invade our county. At a packed high school auditorium in Greenfield, I listened to a factory farmer trying to defend his practices--and he couldn't. Did that make him listen to the folks who value their clean air and clean water? Not for a second! He was determined to build no matter what the environmental cost and quality of life issues for the rest of us. We are counting on the DNR to stay true to its mission of protecting and preserving environmental quality.

Sincerely,

Gwen Yazel McClintic

From: "Sandi Lawrence" <lwrence@netins.net>
To: <bryan.bunton@dnr.state.ia.us>
Date: 3/16/04 5:53PM

Dear Mr. Bunton:

I support the DNR's proposed hydrogen sulfide standard of 15 parts per billion, one-hour average, that was recommended in the joint University study. This is a good standard that, once enforced, will help protect our health. The DNR must issue a rule based on this standard!

The DNR also must include an ammonia and odor standard as recommended in the joint University air quality study. Iowans need a limit on the amount of ammonia and odors that come out of factory farms!

The DNR must support the joint University air quality study released in February 2002 that states hydrogen sulfide and ammonia have been measured near factory farms in concentrations that could be harmful to humans. This joint study is based on the best science available, compiled by 27 state university professors, and peer-reviewed by eight international and national experts. We have sound science, now we must use it.

Numerous scientific studies document the health effects associated with factory farm air pollution. For the public health of rural Iowans, factory farms must be required to lower the amount of their emissions.

Sincerely,
Larry and Sandi Lawrence

Outgoing mail is certified Virus Free.
Checked by AVG anti-virus system (<http://www.grisoft.com>).
Version: 6.0.620 / Virus Database: 399 - Release Date: 3/13/04

Dear Mr. Bunton:
I support the DNR's proposed hydrogen sulfide standard of 15 parts per billion, one-hour average, that was recommended in the joint University study. This is a good standard that, once enforced, will help protect our health. The DNR must issue a rule based on this standard!

The DNR also must include an ammonia and odor standard as recommended in the joint University air quality study. Iowans need a limit on the amount of ammonia and odors that come out of factory farms!

March 14, 2004

Dear DNR:

We vehemently support strong air quality standards. We would hope that the Iowa Department of Natural Resources would also be for protecting not only the population of Iowa, but would stand firm in trying to protect the natural resources of this state. Relaxing environmental safe guards diminishes not only the state, but the relevance of having a Department of Natural Resources. If the DNR does not stand up for strong air quality standards, then who does? Corporate America? Factory farms? Hog confinements?

The joint University of Iowa and Iowa State University report released in February 2002 states that hydrogen sulfide and ammonia have been measured near factory farms in concentrations that could be extremely harmful to humans. Hog confinement units have constant fans going in the units with a warning system in effect in case the fans shut down to let the curtains down. Hogs will pass out within 20-30 minutes of breathing the stilled air and begin to die at 1 1/2 -2 hours. How then can we possibly believe that hydrogen sulfide and ammonia can not be harmful to people? Let's run a quick test. Anyone not thinking it dangerous could stand in the building with no fans going and the curtains up. After 30 minutes, those who could walk from the building would be able to add a first hand knowledge to the debate that hydrogen sulfide and ammonia were harmless to them.

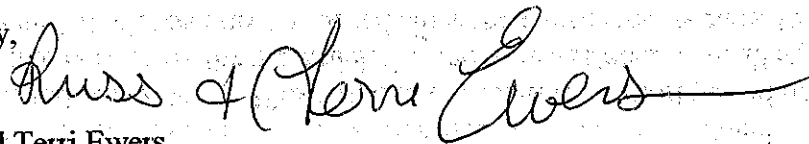
We live two miles from a hog confinement unit. During certain times of the year, the odiferous gasses can become unbearable even at our distance. One of our daughters who was visiting became ill and had to leave. If exposed to the smell for a short period of time, it brings on migraine like headaches for me which the doctor has related to an allergic reaction to the environment (which has only happened since the confinements came to the area 2 1/2 years ago).

We object to the DNR's decision not to include ammonia standards of 150 ppb and odor standards of 7:1 dilution rate in the rules. We need to limit ammonia and noxious odors from factory farms.

We support the air standards proposed by the DNR of 15 parts per billion of hydrogen sulfide for a one hour average. We believe that Iowa should become a place people want to stay, not hurriedly drive through to try to reach one of our neighboring states, who do have strong air quality standards. Don't give a 7 day grace period to corporate (factory) farms to pollute. Should anyone be given a grace period to harm others? All air quality violations effect the health and well being of our state, not just after 7 days of violations does poisonous gasses become a health risk.

We support strong air quality standards. Iowa should again become a place for "a field of dreams" not a nightmare waiting to happen.

Sincerely,

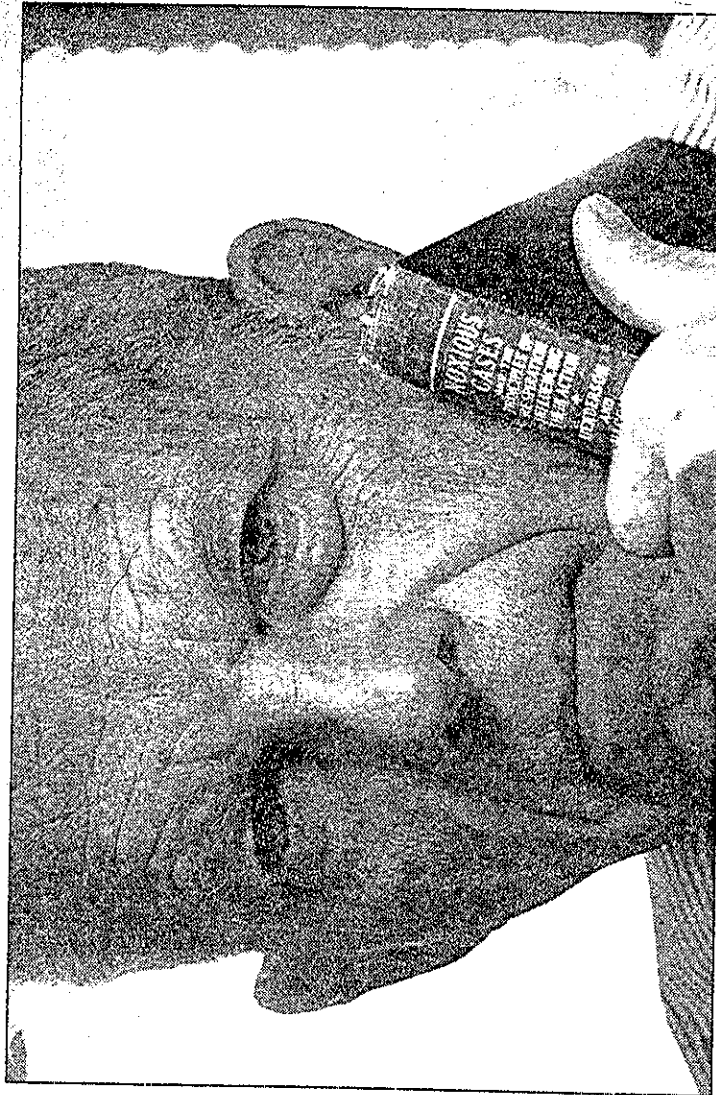


Russ and Terri Ewers
10712 Jonquil Ave
Clear Lake, IA 50428
e-mail: pearl@netins.net

RECEIVED

MAR 16 2004

SPECIAL REPORT



By Rene Macura, AP for USA TODAY

“You’re progressively dehumanized by the dose. The evidence is pretty convincing that whether explosively or insidiously — at low doses — the effects (of hydrogen sulfide) are the same: It’s this progressive loss of brain.”

— Kaye Kilburn,
head of environmental
medicine at the
University of Southern
California

The World Health Organization (WHO) recommends 5 ppb for a 30 minute average as a level that will have minimal to no discomforting health effects (headaches and nausea) on people. Through their research, they determined that hydrogen sulfide at 15 ppb for a 30 minute average had negative impacts on 22% of the population, and at 30 ppb for a 30 minute average had negative impacts on 40% of the population.

Catherine F. —

Bryan Bunton
Iowa DNR
Air Quality Bureau
7900 Hickman Road
Urbandale, IA 50322

Dear Mr. Bunton:

I support the DNR's proposed hydrogen sulfide standard of 15 parts per billion, one-hour average, that was recommended in the joint University study. This is a good standard that, once enforced, will help protect our health. The DNR must issue a rule based on this standard!

The DNR also must include an ammonia and odor standard as recommended in the joint University air quality study. Iowans need a limit on the amount of ammonia and odors that come out of factory farms!

The DNR must support the joint University air quality study released in February 2002 that states hydrogen sulfide and ammonia have been measured near factory farms in concentrations that could be harmful to humans. This joint study is based on the best science available, compiled by 27 state university professors, and peer-reviewed by eight international and national experts. We have sound science, now we must use it.

Numerous scientific studies document the health effects associated with factory farm air pollution. For the public health of rural Iowans, factory farms must be required to lower the amount of their emissions.

Sincerely,

Dan and Sheila Westegard
Bloomfield, IA

[Get tax tips, tools and access to IRS forms – all in one place at MSN Money!](#)

From: "David N Bolin" <dvbolin@butler-bremer.com>
To: <Bryan.Bunton@dnr.state.ia.us>
Date: 3/17/04 10:26AM
Subject: Air Quality standard for H2S

I support the adoption of a hydrogen sulfide standard if it is based on the best available scientific information. The proposed 15 ppb health effects level is not based on the best available information and should be abandoned. The University of Iowa/Iowa State University Report recommendation is outdated and based on flawed assumptions.

I support the rule requiring all measurements be taken within 300 feet of the separated location. If the field study shows there is a health impact from AFOs at a separated location, I would support the development of air quality rules as long as they are in compliance with statutory law and developed with the support of sound science.

Dave Bolin
30707 180th St.
Clarksville, IA 50619-9628
dvbolin@butler-bremer.com

From: "Ryerson Auction Realty, Ltd " <ryerson@goldfieldaccess.net>
To: <bryan.bunton@dnr.state.ia.us>
Date: 3/17/04 12:22PM
Subject: Air quality

Eugene L Ryerson

2761 Country Lane Circle, Eagle Grove, IA 50533-8722

515-448-4269 Home 515-689-3714 Cell

ryerson@goldfieldaccess.net

Bryan Burton

I live ½ mile Northeast of a DeCoster site in Wright County, IA. Somedays the Southwest wind makes life unbearable. The fellow that works with me goes home sick at nights, my grandchildren can't even play in the yard. Iowa needs air quality standards.

I only wish some of you had to live in these conditions. Our family settled here in 1881 and have paid their bills & supported Iowa all this time, but we are now second rate citizens.

Thanks Gene Ryerson

From: "Multi-Rose Jerseys, Inc " <jerseys@svtv.com>
To: <Bryan.Bunton@dnr.state.ia.us>
Date: 3/17/04 7:58PM
Subject: Air Quality Comments

DNR-Bryan Bunton

I support the adoption of a hydrogen sulfide standard if it is based on the best available scientific information. The proposed 15 ppb health effects level is not based on the best available information and should be abandoned. The University of Iowa/Iowa State University Report recommendation is outdated and based on flawed assumptions.

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Sincerely Reed Metzger

March 13, 2004

Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road
Urbandale, IA 50322

Dear Mr. Bunton:

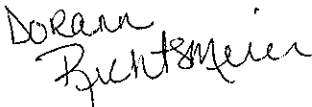
This letter is in regards to the IDNR's proposed hydrogen sulfide rule for livestock production. As I understand the proposed rule, the department is recommending 15 ppb for hydrogen sulfide for only 8 hours a year. Yet, this standard is not consistent with the conservative levels that have been established by the U.S. Centers for Disease Control. The CDC says that even sensitive populations, such as children with asthma, are at a minimal risk being exposed to 30 ppb of hydrogen sulfide of 14 - 365 consecutive days.

The health and well being of Iowans is very important, and livestock producers know this. New rules and regulations must be appropriate, fair, and based on sound science. Right now, you are proposing to use the exact hydrogen sulfide standard that the Legislature nullified, even worse is that is not based on science or even the ISU/U of I literature review. When the Legislature nullified your proposal last year, they requested that the IDNR base its standards on sound science and stay within the boundaries of Iowa law. However, the IDNR continues to monitor hydrogen sulfide at various distances from farming operations rather than at the neighbor's residence, which is clearly defined in the law. All air quality monitoring should be conducted from the separated location. If there is in fact a health impact, the monitoring should be done at the residence to give the health impact credence.

I feel that the best interest of the Iowa taxpayer is not being served. This was opinion was made very clear when the Iowa Legislature nullified the IDNR's air quality standards last year. It seems to me that an incorrect message is being sent to Iowans that this level is necessary to protect public health. I think that this is in fact a political standard, not a health one.

I am very disappointed in your proposed rule and your attempt to over regulate the livestock industry. I strongly encourage you to rethink your actions and complete a scientific study, then determine if there is a public health issue.

Sincerely,



Dorann Richtsmeier

RECEIVED

MAR 17 2004

I am writing to support the proposed standards for hydrogen sulfide for factory farms. Do not let them be weakened by the Iowa Farm Bureau & its factory farms. The DNR must move forward with strong air quality rules that will protect public health.

Thank you

Ruth Lux

RECEIVED

MAR 17 2004



Ruth Lux
PO Box 122
Lidderdale IA 51452-0122

Don Holst

217 E. Parkview Dr. Walcott, Iowa 52773

I am a farmer and I am opposed to the
15 ppt. standard DNR proposed.

From: Jay and Jeanne Hansen <jhansen@forbin.net>
To: <Bryan Bunton@dnr.state.ia.us>
Date: 3/18/04 9:06PM
Subject: Proposed Air Quality standard

I support the adoption of a hydrogen sulfide standard if it is based on the best available scientific information. The proposed 15 ppb health effects level is not based on the best available information and should be abandoned. The University of Iowa/Iowa State University Report recommendation is outdated and based on flawed assumptions.

I support the rule requiring all measurements be taken within 300 feet of the separated location. If the field study shows there is a health impact from AFOs at a separated location, I would support the development of air quality rules as long as they are in compliance with statutory law and developed with the support of sound science.

Thanks for your help.

Jay Hansen, Dairyman
Hudson, Iowa

From: "Kevin Kendra Gilbert" <kgilbert@rconnect.com>
To: <bryan.bunton@dnr.state.ia.us>
Date: 3/18/04 9:39PM
Subject: comments regarding Air Quality

Dear Mr. Bunton,

Nothing is more important than the health and well-being of Iowans. Farmers care about clean air, clean water and public health. Farm families live and work on the land so it's in our best interest to care for the environment as well as the animals we raise. My husband and I raise hogs on our farm. We have recently expanded our business to enable our son to make his living in the agriculture field also. The three of us work inside confinement buildings every day. We raised our family on the farm and everyone did their part to make things work. We are and have always been a healthy family. It seems odd to me that there is so much concern about the health and safety of people who never go in hog buildings.

Iowa is and has always been an agriculture state. We can be very proud of this fact. Iowa is a big part of the national security of the U.S. If we make production agriculture leave the state because of excessive regulations, we will be cutting off our own foot in more ways than one.

New rules regarding air quality proposed by the DNR will send a false message to Iowans that 15 ppb of hydrogen sulfide is the necessary level to protect public health. This level is not consistent with levels established by the U.S. Centers for Disease Control. I support the clean air legislation and ask the legislature and the governor to enact it. The bill requires DNR to finish the remaining year of their field study and gives them authority to adopt regulations for livestock operations IF the data shows violations of the CDC minimal risk levels. The Agency for Toxic Substances & Disease Registry (ATSDR) standards in this bill includes a 30 times safety factor to protect sensitive populations such as those with asthma, children with respiratory problems and the elderly. Let's make laws based on sound science not fear.

Sincerely,

Kendra Gilbert

2681 Hickory Ave

Ionia, IA 50645

Phone # 641-435-2055

From: "Galen & Jeanne Breuer" <breulane@rconnect.com>
To: <Bryan.Bunton@dnr.state.ia.us>
Date: 3/19/04 9:00AM
Subject: Air Standards

Bryan,

I support the adoption of a hydrogen sulfide standard if it is based on the best available scientific information. The proposed 15 ppb health effects level is not based on the best available information and should be abandoned. The University of Iowa/Iowa State University Report recommendation is outdated and based on flawed assumptions.

I support the rule requiring all measurements be taken within 300 feet of the separated location. If the field study shows there is a health impact from AFOs at a separated location, I would support the development of air quality rules as long as they are in compliance with statutory law and developed with the support of sound science.

Sincerely,

Galen Breuer

From: "kim & marsha francisco" <cisco@lucasco.net>
To: <bryan.bunton@dnr.state.ia.us>
Date: 3/19/04 10:27AM
Subject: Air quality proposal

I think, particularly in light of recent Supreme Court gambling decision, that singling out a single industry is not only unfair and punitive to that industry but illegal. The source of a pollutant is irrelevant to its health effects and so a dual standard makes very little sense. Kim Francisco

From: "Hickory Hill Farms, Inc " <moofarm@nethtc.net>
To: <Bryan.Bunton@dnr.state.ia.us>
Date: 3/19/04 4:36PM
Subject: Air Quality Standard

I support the adoption of a hydrogen sulfide standard if it is based on the best available scientific information. The proposed 15 ppb health effects level is not based on the best available information and should be abandoned. The University of Iowa/Iowa State University Report recommendation is outdated and based on flawed assumptions.

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Scott Meissner
President
Hickory Hill Farms, Inc.
Hospers, IA 51041
(712) 737-8680

March 8, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

Dear Mr. Bunton:

It is very important to everyone to have good air quality. I am a resident of Minnesota but am employed as a pork producer in the state of Iowa. Being involved in the livestock business for a great many years and with a urgent desire to continue my livelihood in such I am compelled to voice my dismay at the IDNR's attempt to implement a 15 ppb hydrogen sulfide level.

From the information I have gathered, this new standard would not be supported by any studies previously done at our two universities, or even the United States Center for Disease Control levels.

Historically the IDNR has made well informed, well researched recommendations for Iowa agriculture, but, this looks like putting the cart in front of the horse before collecting "valid" unbiased data.

We all have families and are trying to be good stewards of land and air but let us not cry wolf when one doesn't exist!

Sincerely,



Martin Hoelsing
403 5th St SW
Austin, Mn 55912

RECEIVED
MAR 19 2004

March 8, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

Dear Mr. Bunton:

It is very important to everyone to have good air quality. I am a resident of Minnesota but am employed as a pork producer in the state of Iowa. Being involved in the livestock business for a great many years and with a urgent desire to continue my livelihood in such I am compelled to voice my dismay at the IDNR's attempt to implement a 15 ppb hydrogen sulfide level.

From the information I have gathered, this new standard would not be supported by any studies previously done at our two universities, or even the United States Center for Disease Control levels.

Historically the IDNR has made well informed, well researched recommendations for Iowa agriculture, but, this looks like putting the cart in front of the horse before collecting "valid" unbiased data.

We all have families and are trying to be good stewards of land and air but let us not cry wolf when one doesn't exists!

Sincerely,

Roxanne Dvorak
RR2 Box 269
SpringValley, MN 55975

RECEIVED

MAR 19 2004

March 8, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

Dear Mr. Bunton:

It is very important to everyone to have good air quality. I am a resident of Minnesota but am employed as a pork producer in the state of Iowa. Being involved in the livestock business for a great many years and with a urgent desire to continue my livelihood in such I am compelled to voice my dismay at the IDNR's attempt to implement a 15 ppb hydrogen sulfide level.

From the information I have gathered, this new standard would not be supported by any studies previously done at our two universities, or even the United States Center for Disease Control levels

Historically the IDNR has made well informed, well researched recommendations for Iowa agriculture, but, this looks like putting the cart in front of the horse before collecting "valid" unbiased data

We all have families and are trying to be good stewards of land and air but let us not cry wolf when one doesn't exists!

Sincerely,



Cindy Ziegler
54840 110th Street
Lyle, Mn. 55953

RECEIVED

MAR 19 2004

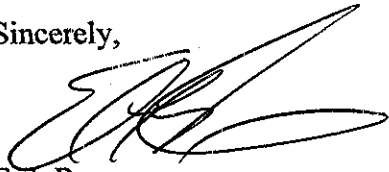
March 7th, 2004

Mr. Bryan Bunton

This letter is the first letter I have sent in response to any issue regarding my chosen career field. Pork production is very important to our state and I am disappointed in your actions to unfairly regulate agriculture. It appears that the DNR has decided to propose an air quality restriction concerning hydrogen sulfide content. This 15 ppb standard is not based on science and is an unfair standard. I encourage you to reconsider your stance on the proposed standard.

It is important to all of us to have good air quality in Iowa. Activist pressure is based on a personal agenda, we are only interested in what is *fair* to agriculture and to the surrounding communities. *Please* conduct the monitoring study, determine *if* a problem exists and then base the standard on good science.

Sincerely,



Erik Rasmussen
312 W 3rd St
Iowa Falls, Iowa, 50126

RECEIVED
MAR 19 2004

Bryan Bunton
Iowa DNR Air Quality Bureau
7900 Hichman Road
Urbandale, Ia ,50322

Dear Sir:

In responce to your ruling on the new health standard for hydrogen sulfide at 15 parts per billion (ppb) I feel this puts an unfair burden to measure hydrogen sulfide on the agriculture.

My wife Bette ran our confinement buildings in the 1980' s and into the 1990's I helped as needed I usually hauled all the manure and it was an asset to our crop farming I'm in my late 60's and my lungs are as good or better than any of my friends from the city My wife was in the builldlings every day feeding, cleaning and checking on the health of the hogs Her lungs are probably better than most

This is not consistant with levels established by the US Center for Disease Control It is a standard that would send a false message to fellow Iowans that this is a necessary level to protect our public health

Our son is now operating our farm. Please do not put unfair rulings on our young people. Large farm con afford to spend the extra to comply to more rules than the smaller farmers.

Livestock is our first farm market for corn and beans raised in our state Don't put this at risk with this unfair ruling Livestock industry generates a lot of income for the local and state businesses.

Axel Larson
Red Oak , Iowa

RECEIVED

MAR 19 2004

From: Kathie & Dave Gerber <kdgerber@dtinspeed.net>
To: <bryan.bunton@dnr.state.ia.us>
Date: 3/20/04 6:54PM
Subject: Hogs

Dear Mr. Bunton. I am adding my voice to those who feel that we must do something to stop the attempt by industrial agriculture to influence agriculture and pollution legislation in a way that would benefit only them and be to the detriment of the majority of Iowans. I know you have read the letter below - but it speaks for me too. Kathie Gerber

Dear Mr. Bunton:

I support the DNR's proposed hydrogen sulfide standard of 15 parts per billion, one-hour average, that was recommended in the joint University study. This is a good standard that, once enforced, will help protect our health. The DNR must issue a rule based on this standard!

The DNR also must include an ammonia and odor standard as recommended in the joint University air quality study. Iowans need a limit on the amount of ammonia and odors that come out of factory farms!

The DNR must support the joint University air quality study released in February 2002 that states hydrogen sulfide and ammonia have been measured near factory farms in concentrations that could be harmful to humans. This joint study is based on the best science available, compiled by 27 state university professors, and peer-reviewed by eight international and national experts. We have sound science, now we must use it.

Numerous scientific studies document the health effects associated with factory farm air pollution. For the public health of rural Iowans, factory farms must be required to lower the amount of their emissions.

Sincerely,

March 9, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

Dear Mr. Bunton:

I am writing you as I've been hearing about the DNR's proposed hydrogen sulfide rule for livestock production. As a livestock producer, I want to convey that this proposal does not base its standard 15 ppb on enough field information or true science. I believe we should do more work to see what levels should be considered a standard before jumping into a number that may not actually represent what levels should be maintained. I hope you feel that we should do more scientific work before setting such a standard.

The proposed standard is not close to the University report and the proposed exposure level is too conservative. Animal production is key to the State of Iowa and I am discouraged that there are actions taking place that unfairly regulate agriculture. Also, you have been monitoring at locations other than the neighbor's residence near their home, as required by law.

I am concerned about good air quality as anyone, for myself, my family and my neighbors. I just ask that we take more time monitoring, studying this topic. If we believe a problem exists, we then can base the standards on good science, not the agenda of activist groups whom themselves need standards and fact based ideas.

Sincerely,



Doug Garrison
601 West Mills
Creston, Ia 50801

RECEIVED

MAR 22 2004

Mr Bryan Banton
Iowa Dept. Of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA. 50322

Dear Mr. Banton

I have worked with livestock for many years now
and it seems that with every year that goes by the
DNR tries to make more rules.

I have kids and I am concerned about clean
air for ~~my~~ everyone but I think that all the bases
need to be covered before we make new laws

I just want all groups and pork producers to
have laws that they both are able to work with
and not at the cost of jobs.

Sincerely

Mike Marshall

205 E Main

Tingley IA 50863

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MAR 22 2004

March 4, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road
Urbandale, IA 50322

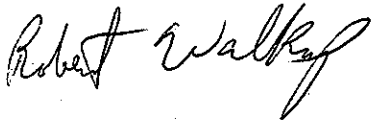
Dear Mr. Bunton,

I am a pork producer writing this letter in response to the DNR's proposed air quality standard of 15 ppb for hydrogen sulfide. I am disappointed with the proposed rule. I encourage you reconsider this proposed regulation.

The livestock industry is valuable to the local economy. It is unfair to the livestock producers to put such strict regulations on the industry. The scientific research on this issue is not supported by scientific research.

I will support rules for livestock production if they are supported by scientific data.

Sincerely,



Robert Walkup
1857 178th st.
Diagonal, IA 50845

RECEIVED

MAR 22 2004

MR. Bryan Bunton
Iowa Dept. of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA, 50322

Dear, Mr. Bunton

I am greatly concerned about the proposed rule of 15 ppb for hydrogen sulfate for only 8 hours a year, as it is not even based on any scientific research. Pork Production is very important to the State of Iowa and if the proposed standard of 15 ppb level becomes a law it will have a negative impact on the pork industry in Iowa. This would be very unfair to pork producers. Clean air is important to everyone in Iowa, but the 15 ppb level would not be acceptable without the proper research or data to determine what is a safe level or even if there is a problem at all. Please reconsider any further actions until the proper research has been completed, and do not make any decisions based on any pressure given by any activist groups.

SINCERELY
Randy Hosfield
1272 110th Street
Diagonl IA.
50845

RECEIVED

MAR 22 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road
Urbandale, IA 50322

Dear Mr. Bunton:

This letter is in regards to the proposed hydrogen sulfide ruling for livestock production. To the best of my knowledge, the proposed 15 ppb standard has no scientific background to substantiate that level.

Before air quality standards are set there should be thorough testing done. This testing needs to be completed at the residences of the neighbors, so the true levels and effects, if any, can be determined.

In closing, while I am in support of clean air standards, these standards must be based on scientific facts after extensive research is completed.

Thank you,

Mike Shields
600 W. Adams St.
Mt. Ayr, Iowa 50854

RECEIVED

MAR 22 2004

March 4, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road
Urbandale, IA 50322

Dear Mr. Bunton,

I am a pork producer and this letter is in response to the DNR's proposed air quality standard of 15 ppb for hydrogen sulfide. I am disappointed with the proposed rule and its unscientific basis. I encourage you reconsider this proposed regulation.

The livestock industry is very important to Iowa and its economy. It is unfair to the livestock producers to put such strict regulations on the industry, especially without the scientific proof. The scientific research on this issue has not been completed and therefore the DNR cannot say what health problems may come to the public.

I will support air quality rules for livestock production if the study is completed in compliance with Iowa law and the standards are developed with the support of scientific data.

Sincerely,



Kari L. Bloom
2026 US Hwy 71
Villisca, IA 50864-7080

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MAR 22 2004

March 4, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road
Urbandale, IA 50322

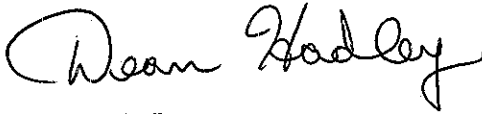
Dear Mr. Bunton,

I am a pork producer writing this letter to express my concern about the proposed air quality standard of 15 ppb for hydrogen sulfide. I can not support air emission standards that are not founded on research. These same hydrogen sulfide standards were nullified by the Iowa Legislature last year.

The livestock industry is a very large and important part of our state. It is unfair that the IDNR is trying to establish rules that single out this very important part of the economy. All parties involved need to work together to develop standards that are practical and obtainable. This needs to be done with scientific research. This research needs follow procedures that can be duplicated in all situations involved. One certain area can not be singled out. We need to make sure that all findings are consistent and can be supported with evidence.

I will support rules that are supported by research. I live and work in Iowa and want to raise my family in a healthy environment. I strongly encourage you to rethink you 15 ppb hydrogen sulfide standard. Rules like this will drive people from the state.

Sincerely,



Dean Hadley
1079 210th Ave
Shannon City, IA 50861

RECEIVED

MAR 22 2004

February 18, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, Ia 50322

Dear Mr. Bunton:

I would like to comment on the proposed air quality standard of 15 ppb for hydrogen sulfide. Last year, Iowa DNR proposed air quality standards for hydrogen sulfide and the Iowa Legislature reversed the rule. Now I understand that you are proposing the exact same hydrogen sulfide standard that was previously nullified! I also understand that the Iowa DNR standard is not based on science or even the findings of ISU and U of I! What I don't understand is how you could create a standard for such an important part of Iowa's economics without conducting a thorough scientific study.

Furthermore, when the legislature repealed your proposal last year, they made their position very clear. They stated that Iowa DNR must base the standards on good science and stay within Iowa law. Are you continuing to monitor hydrogen sulfide at various distances from livestock operations? Or are you following Iowa law by monitoring the levels at the neighbor's residence?

Livestock production is important to the state of Iowa and I am disappointed in your attempt to unfairly regulate it. I encourage you to reconsider the proposed standard. It is important to all of us to have good air quality in Iowa and I challenge you to conduct a scientific study to determine if a problem exists and then base the standards on solid data, not activist pressure. I will support air quality standards for livestock if a study is conducted within Iowa law and the standards are supported by scientific data.

Sincerely,



Julie Crouch
1767 Creamery Road
Afton, Ia 50830

RECEIVED

MAR 22 2004

Dear Sir,

My name is John Fluit Jr.,
I am from Leewood, La in Lyon County,
My wife and I have been married for 15
years and have been blessed with 4 children.
We were both raised farm children and like
the lifestyle. We own and operate a 2500hd
feedlot, which we purchased without any assistance,
even from our parents. We feel like a dog
in a cage some days and everyone who walks
by gives us a jab with a stick. The
latest of which is, the hydrogen sulfide regulations.
Please don't lower the threshold any lower.

Thanks for your time.

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MAR 22 2004

Respectfully,

John, Anita, + family Fluit

March 10 2004

MR Bryan Burton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road
Urbandale IA, 50322

Dear MR Burton

This is the only time I have made comment to the DNR.
Your standards of 15 PPB for Hydrogen Sulfide is
NOT consistent with even the most conservative
levels established by the U.S. Disease Center
I do NOT understand how you can make the standards
for our industry without first making a baseline
study to determine if there is a problem.

I have learned the DNR is NOT monitoring air
at the locations made by law law at residence
How will I know the impact if you the DNR do NOT
do this. Wright

I will support ~~the~~ air quality rules for all livestock
farms if all standards are developed with the support of
solid science

Scott Dard

RECEIVED

MAR 22 2004

Mr. Bunton,

I am responding to the livestock hydrogen sulfide rule. As an Iowa livestock producer, I take pride in raising food for the world.

But as I understand this, the DNR needs to prove their point before moving forward toward an unfair rule. The 15 ppb is not consistent with the CDC.

I am very disappointed in your proposal, and encourage you to rethink your actions and to please do a scientific study to back you up.

Sincerely,
Jay Gosner
2685 270th St,
Afton, IA 50830

RECEIVED

MAR 22 2004

George, Iowa
March 18, 2004

Bryan Bunton
Iowa DNR

Air Quality Bureau
7900 Hickman Rd
Urbandale, Ia 50322

Dear Mr Bunton,

Thank God, the DNR is finally going to do something about the hog smell!

We have farmed for 47 years and have had livestock all those years on our farm yard. Now, when we walk to the end of the driveway to our mailbox, we can count 17 hog buildings within a 3 mile radius of our farm. Three of the buildings have Smithfield hogs in them. The balance of the buildings have Farmland hogs in them. None of the hogs are owned by any local farmers. Five (5) years ago, my neighbor built four 1000 head buildings approximately 1700' south of my home. There are days when we can not stand the smell on our yard. Our drapery sticks like hog manure as we don't even have windows open. In the fall and spring when he opens

RECEIVED

MAR 22 2004

his manure; half the time they spread the manure on top of the ground without turning it in. This is because they have so much manure already on this ground. It is so thick, they cannot disk it in immediately because the disk plugs up. Therefore they leave it dry out or evaporate on top of the ground for several days before they disk it in. Its totally ROTTEN! Can you imagine how the stink is on my yard? There have been mornings when I have lost my breakfast standing by my silo trying to feed my cattle.

Whatever your parts per million are that you are recommending, they are still too high.

Also, we live 9 miles from the Minnesota state line. There are Hog Corporations in Minnesota coming into Iowa and buying land and building Hog houses in Iowa, because they arent allowed to build in the state of Minnesota.

I would like to see a moratorium "No More Hog Buildings In Iowa, unless they are built three miles south of Des Moines where our past Governors & present Governor can smell them

Page Three

Some beautiful summer, spring
or fall right when there is a
nice light south breeze + the humidity
is high, we would like to invite
you and your family for a lovely
picnic supper in our home's front
yard. We would like to see if
you can enjoy it.

Thank you for all your
work in trying to clean up
Iowa.

Dennis D. Wilbanks
Lou Claire M. Wilbanks
2327 Log Avenue
George Iowa 51233

P.S. A family shouldn't have to move
away from the farm space owned for
many years to escape the bad smell

RECEIVED

MAR 22 2004

March 11, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road
Urbandale, IA 50322

Dear Mr. Bunton:

This is the first time I have ever provided public comment to the DNR. Your proposed air quality standard of 15 ppb for Hydrogen Sulfide is not consistent with even the most conservative levels established by the U.S. Centers for Disease Control. I do not understand how you can possibly create a standard for our industry without first conducting a thorough study to determine if there is a public health problem.

From what I have learned, the DNR is not monitoring air quality at the location designated by Iowa law – at the neighbor's residence. How will we know if the neighbors are impacted if you do not take measurements at their home? I also do not understand the proposed exposure level standard. Once again, this level is not based on science and should be revised.

I will support air quality rules for livestock production if the study is completed in compliance with Iowa law and the standards are developed with the support of solid science.

Sincerely,



Jeff Ward
2256 Yellow Rose Ave
Murray, Ia 50174

RECEIVED
MAR 22 2004

Denis Link
404 S CASS
Mt Airy Ia
50854

February 9, 2004

Mr Bryan Bunton
Iowa Dept of NATURAL RESOURCES
Air Quality Bureau
7900 Hickman Road
Urbandale, Ia 50322

Dear Mr Bunton

I have never voiced my opinion on any of these issues but I think its about time people start to stand up for themselves. The proposed 15 ppb for Hydrogen Sulfide needs to be more consistent with conservation levels that was established by the U.S. Centers for Disease Control. I think maybe you need to get more facts before you commit on what you want to do. I have worked & lived on a farm all my life and there will not be any farmers left if you dont start working for people of the state instead of lobbyists.

I think you need to do a better study like around rural residents instead of at the hog sites. I have worked in a hog confinement the last 8 years & my health is better now than when I was farming crops, raising hogs & cattle, and I even have asthma.

RECEIVED

MAR 22 2004

Sincerely
Denis Link

Dear Mr. Bunton,

I have been informed that the air quality standard of 15ppb for Hydrogen Sulfide is not consistent with the Center for Disease Control's standards, (conservative standards). This tells me the DNR is unfairly and unjustly targeting the industry that is thriving in the State of Iowa. Even though it is not the way our fathers or Grandfathers raised hogs it is fastly becoming the norm. To drive this industry away would only hurt our rural communities. Iowa is known for corn and pork production and until there is more information and proof for these steps I urge you to proceed with caution.

Sincerely,

J. Chi-Eckel
S. Chris Eckels

RECEIVED

MAR 22 2004

Balderston Farms, Inc.
3978 Sutton Road
Central City, IA 52214

Randy Balderston, president

Bryan BUNTON
IOWA DNR
7900 HICKMAN RD.
URBANDALE, IA 50322

RECEIVED

MAR 22 2004

Dear Sirs.

I WAS UNABLE TO ATTEND ANY OF THE MEETINGS SINCE THEY WERE A DISTANCE, & QUITE POSSIBLY I WOULD NOT HAVE HAD A CHANCE TO SPEAK ANYWAY, BUT WOULD LIKE TO TAKE THIS CHANCE TO COMMENT. I CANNOT BELIEVE THAT YOUR DEPARTMENT CONTINUES TO PUSH FOR THESE LOW AIR STANDARDS WHEN IOWA STATE ^{UNIVERSITY} HAS REALIZED THAT THE INITIAL DATA WAS FLAWED & URGE YOU TO GO WITH THE NATIONAL STANDARD OF 70 ~~PBB~~. WE LIVE WITHIN 150 FT OF OUR 490 HD SOW UNIT & HAVE FOR NEARLY 30 YEARS. WE'VE HAD NO ILL EFFECTS, (REALLY VERY LITTLE ODOOR). I'M SICK & TIRED OF BEING PUSH AROUND BY ERRONEOUS REGULATIONS, WHEN AGRICULTURE IS THE TRUE ECONOMIC ENGINE IN THIS STATE! WAKE UP BEFORE REGULATIONS FORCE OUR FOOD PRODUCTION TO 3RD WORLD COUNTRIES (WHO WOULD, BY THE WAY, WELCOME THAT.) I WOULD HATE TO SEE MY GRANDCHILDREN AT THE MERLY OF DICTATORS FOR THEIR FOOD. LETS PROMOTE AG & ANIMAL AGRICULTURE!

Sincerely RANDY BALDERSTON, ISU '70

From: "Dan Swann" <swann@fbx.com>
To: <Bryan.Bunton@dnr.state.ia.us>
Date: 3/23/04 10:49PM
Subject: Re: DNR Air Quality Regulations (Re: DNR Air QualityRegulatinos)

Bryan,

I just had a few additional comments on the air quality regs that someone thinks will make Iowa a better place to live

I did not get to speak at Mason City on this important issue.

To start with, has any one thought about the enforcement of the law?????

I can just see some flunky employee sitting in a trailer out in someones field or lawn watching meters 24 hrs. a day possibly taking payoffs from whomever has the most money. I can see someone setting buckets of dung or truckloads of whatever near or on this monitor in the fog or dark, leaving margins of error big enough to drive a slurry tank thru. Who is going to pay for the personel, monitors etc., the owner or the complainer?

I am farmer, just in case you couldn't tell, raise pigs, cattle etc and just about fed up with government. One solution for the farmer is to buy all the building sites that surround him and level them. This does away with the tax base and all complaints from your neighbors. This works well.

I'm at a point in life where if regs get much more strict I'm going to say the hell with it all. That includes over two million in sales from my little podunk operation. I would almost bet 90% of farmers in my age bracket feel the same way. Farmers 55 to 65 probably have 90% of the money in the state. I can see this bill helping the Iowa economy immencely!!!!

If these old bucs quit I think Braazil would be more than happy to take up livestock and help our balance of trade!!!!!! Ha Ha

Please consider that if the livestock leaves the country so will our grain market.

SINCERELY,, Daaniel Swann

To: <swann@fbx.com>

Sent: Monday, March 22, 2004 11:18 PM

Subject: Re: DNR Air Quality Regulations (Re: DNR Air QualityRegulatinos)

Thank you for submitting public comments regarding the DNR's proposed rule to establish an HEV/HES for hydrogen sulfide. The public comment period for this proposed rule ends on April 8, 2004. At that time the department will put together a responsiveness summary which will contain a written response to all comments received. The department may also make changes to the proposed rule based on the comments. I will email you a copy of the responsiveness summary when it is complete (most likely in early May). Thanks again for your comments.

Bryan Bunton
Environmental Specialist
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road Suite 1
Urbandale, IA 50322
515-281-6729
515-242-5094 fax

>>> swann 03/22/04 23:17 >>>

Daniel Swann

March 1, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road Suite 1
Urbandale, IA 50322

Dear Mr. Bunton,

This is a letter regarding the DNR's proposed rule for hydrogen sulfide levels.

We live in an agricultural state, and I am sure the great majority of Iowans are committed to clean air and a quality environment

I would guess the majority of Iowans would agree with me in that the proposed rule of 15 ppb of hydrogen sulfide for eight hours a year is not consistent with the most conservative levels established by the U.S. Centers for Disease Control. We need to base any rule on realistic guidelines. The Iowa DNR should complete their study before they consider making and enforcing rules.

We need to base this rule on fact – not fiction or emotion.

Sincerely,



Fran Foland
1787 Walnut Drive
Geneva, IA 50633

RECEIVED
MAR 23 2004

March 10, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

Dear Mr. Bunton:

As long-time residents of Iowa and having enjoyed both urban and rural living, we support the mission of the DNR in protecting our natural resources. We realize that the threats to clean air and clean water have to be mitigated in order to protect our health and our way of life.

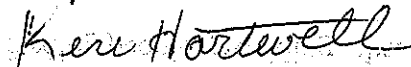
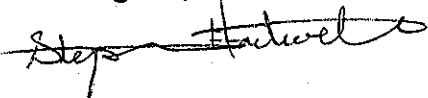
We do however feel that controls, restrictions and regulations that we put upon industry need to be based on sound scientific principles and study. This would include controls placed upon the agricultural industry in our State.

I've had the pleasure of working for a rural agricultural company for the past ten years and I have seen at my company the importance that is placed upon the missions of feeding people, providing jobs, and protecting our natural resources.

It is the opportunity offered by companies like Iowa Select Farms that have enabled us to return to Iowa and to raise a family in the Midwest where we grew up.

We have recently seen news reports suggesting some level of controversy surrounding air quality studies being undertaken by the DNR. We're writing to encourage you to dismiss radicals on both sides of the issue, to resist the temptation to allow politics to enter into decision-making, and to ensure that policies and procedures are based on scientifically-supported studies.

Best regards,



Stephen and Keri Hartwell

404 School Street

Iowa Falls, Iowa 50126

RECEIVED

MAR 23 2004

March 5, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

Dear Mr. Bunton,

I am addressing the Department of Natural Resources on the proposed air quality standard of 15 ppb for hydrogen sulfide.

My understanding is that the legislation being proposed is without thorough scientific study. Living in an agriculture-based State economy, it is important to the entire State of Iowa that the proposal be based on science, not public opinion. This legislation reflects not only on large, corporate producers, but also the small farmer, who is the backbone of our economy.

The DNR must follow the law and monitor the air quality at the neighbor's residence, not at various distances from the operations themselves. I strongly encourage you to re-evaluate the proposed rule, even put it on hold, until a scientific monitoring study can be conducted. Once completed, you can then base the legislation on scientific fact, not public pressure groups or activists.

Sincerely,



Darcy A Hickethier
330 Ohio Avenue
Iowa Falls, Iowa 50126

RECEIVED

MAR 23 2004

March 10, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road
Urbandale, IA 50322

Dear Mr. Bunton:

This is the first time I have ever provided public comment to the DNR. Your proposed air quality standard of 15 ppb for Hydrogen Sulfide is not consistent with even the most conservative levels established by the U.S. Centers for Disease Control. I do not understand how you can possibly create a standard for our industry without first conducting a thorough study to determine if there is a public health problem.

From what I have learned, the DNR is not monitoring air quality at the location designated by Iowa law – at the neighbor's residence. How will we know if the neighbors are impacted if you do not take measurements at their home? I also do not understand the proposed exposure level standard. Once again, this level is not based on science and should be revised.

I will support air quality rules for livestock production if the study is completed in compliance with Iowa law and the standards are developed with the support of solid science.

Sincerely,



Joyce Pohlman
608 15th St. Pl.
Nevada, IA 50201

RECEIVED
MAR 23 2004

February 11, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road
Urbandale, IA 50322


Dear Mr. Bunton:

This is the first time I have ever provided public comment to the DNR. Your proposed air quality standard of 15 ppb for Hydrogen Sulfide is not consistent with even the most conservative levels established by the U.S. Centers for Disease Control. I do not understand how you can possibly create a standard for our industry without first conducting a thorough study to determine if there is a public health problem

From what I have learned, the DNR is not monitoring air quality at the location designated by Iowa law – at the neighbor's residence. How will we know if the neighbors are impacted if you do not take measurements at their home? I also do not understand the proposed exposure level standard. Once again, this level is not based on science and should be revised.

I will support air quality rules for livestock production if the study is completed in compliance with Iowa law and the standards are developed with the support of solid science. I urge you to reconsider and base your findings on solid scientific data and not just emotion.

Sincerely,



Jeff Peters
400 Meadowlake St.
Jewell, IA 50130

RECEIVED

MAR 23 2004

February 28, 2004

Mr Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

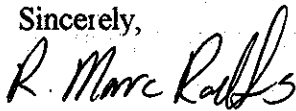
Dear Mr. Bunton,

This letter is in response to the DNR's proposed hydrogen sulfide rule for livestock production. The proposed air quality standard of 15 ppb for hydrogen sulfide is not consistent with even the most conservative levels established by the U.S. Centers for Disease Control. I do not understand how you can possibly create a standard for our industry without first conducting a thorough study to determine if there is a public health problem.

From what I have learned, the DNR is not monitoring air quality at the location designated by Iowa law - at the neighbor's residence. How will we know if the neighbors are impacted if you do not take measurements at their home? I also do not understand the proposed exposure level standard. Once again, this level is not based on science and should be revised.

I will support air quality rules for livestock production if the study is completed in compliance with Iowa law and the standards are developed with the support of solid science.

Sincerely,



R. Marc Roelfs
1018 Main Street
Ackley, IA 50601

RECEIVED

MAR 23 2004

February 25, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road
Urbandale, IA 50322

Dear Mr. Bunton:

It has been brought to my attention that you are trying to once again pass the proposed 15ppb for hydrogen sulfide air quality restrictions. Wasn't this level shot down last year? Have you found new scientific research to back this level? This level still doesn't comply with the most conservative levels established by the U.S. Centers for disease control. Tell me once again where did you get your proposed numbers?

I live here in Iowa and want clean healthy air like all others that live here. I also know that when making laws or rules all must follow guidelines. The first rule is to make sure that proposed rules must be backed by research and facts. It is my opinion that the DNR has overstepped its boundaries on this issue and singled out one industry. Iowa air is not being polluted by one industry there are my things that contribute to air pollution. If all industries are not checked for air pollution it is not fair. There must be more scientific research done to determine what needs to be done with Iowa and it's air pollutants.

At this time I would ask you to reconsider your proposed levels until better research has been performed. We can't keep burdening the livestock industry without proper research being done first. We must all remember the impact the livestock industry has on Iowa's economy and work force while ensuring safety, and a healthy environment for it's people.

Sincerely,

Steve Stocks

2025 150TH ST

CLaion IA

50525

RECEIVED

MAR 23 2004

March 5, 2004

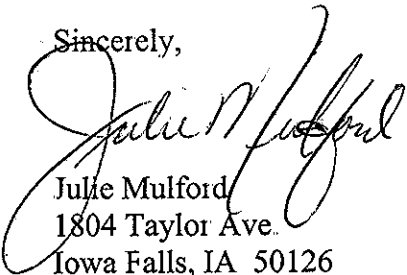
Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road
Urbandale, IA 50322

Dear Mr. Burton:

I am writing in response to the DNR's current proposed air quality standard for hydrogen sulfide and ammonia. In reviewing your proposal, I have some genuine concerns about the 15 ppb for 8 hours standard that your organization is trying to set. It is my understanding that the Iowa Legislature rejected this number last year mainly because it was not based upon any sound science. It is also my understanding that the U.S. Centers for Disease Control, an organization that is considered the eminent protector of human health, has a much more conservative standard at 30 ppb. I am hard pressed to understand why the Iowa DNR feels that this standard should be put in place before you have even finished your field study! I am also concerned with the fact that the monitoring is not being done from the neighbor residences, as clearly defined by the Iowa Legislature, but at various distances from farming operations. How can this possibly give accurate data for the health impact on neighbors?

I am very disappointed in the proposed rule, and your attempt to over regulate the livestock industry. I work for a pork producer that is committed to clean air and a quality environment. We have to live here too! By imposing these unreasonable limits the livestock industry is going beyond the best interests of Iowa and Iowans. I strongly encourage you to rethink your proposal and conduct a study based upon good science to determine if there really is a public health impact at distances prescribed by law.

Sincerely,



Julie Mulford
1804 Taylor Ave.
Iowa Falls, IA 50126

RECEIVED
MAR 23 2004

February 18, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

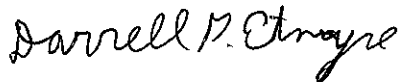
Dear Mr. Bunton:

I am 55 years old and have been involved in the pork industry for most of my life. I cannot understand how you can solve a problem before you have even determined what the true problem is. I can not understand how you can set the level for hydrogen sulfide at 15 ppb for only 8 hours a year when there is no proof or evidence that this is a dangerous level. I am asking you to reconsider this proposed standard and do more research before you impose any air quality standards on Iowa pork producers.

To me the Iowa legislature has made its point quite clear. They asked the IDNR to base their results on the air quality at the neighbor's residence not at the farm. How can you say that 15 ppb for 8 hours per year should be the standard when it has already been proven that children with asthma or the elderly are at a minimal risk being exposed to 30 ppb of hydrogen sulfate for 14 - 365 consecutive days is safe.

Yes, I feel that the DNR is making a great mistake by imposing this unproven level of 15 ppb for hydrogen sulfide on the Iowa pork industry. I would like to see you rethink this and determine if there is an actual health problem here for Iowa agriculture.

Sincerely,



Darrell Etnyre
1326 Washington Ave
Iowa Falls, IA 50126

RECEIVED

MAR 23 2004

March 12, 2004

Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road
Urbandale, IA 50322

Dear Mr. Bunton:

I am employed by an Iowa pork producer and would like to provide you with my comments on the air quality standards you are proposing. First I would like to say that I work in the technology field where I base my decisions from proven scientific facts and standards, not political winds, as logic does not work this way. I am extremely opposed to the proposed air quality standard of 15 ppb for hydrogen sulfide you are supporting. I am opposed to this proposal because it is not based on proven facts from good scientific study. I am aware that the IDNR established air quality standards last year for hydrogen sulfide and the Iowa Legislature nullified them. Now, you are proposing to again use the exact hydrogen sulfide standard that the Legislature nullified, and once again, one that is not based on science.

I find it annoying that the Iowa Legislature dismissed this exact same language last year because it was not founded on good science. Now you are back, once again wasting Iowa tax dollars pushing your agenda; an agenda based not on logic but political whims. I find it amazing that the United States Center for Disease Control has much different standards and acceptable safe levels of exposure than what you are proposing. Does the IDNR know something that the CDC does not? I can answer that question for you, NO! The CDC bases their decisions from sound scientific research, something I urge you and the IDNR to do. If Iowa tax dollars are going to be spent at least spend them researching the situation at hand to make the correct logical decisions.

I support the IDNR in keeping Iowa's lands and waters clean for future generations to enjoy. However, this can only be done by making logical decisions from sound scientific study. I urge you to reconsider your proposal and evaluate your decision making process. Let's make the right decisions for Iowa and Iowa's agriculture industry.

Sincerely,

Brian Dutcher
11584 J Ave
Iowa Falls, IA 50126

RECEIVED

MAR 23 2004

March 8, 2004

Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road
Urbandale, IA 50322

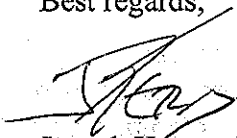
Dear Mr. Bunton:

I am involved in pork production and am an advocate of using science in the decision making process. I am very concerned with the DNR's proposed threshold of 15 ppb for hydrogen sulfide. This value has no technical or scientific merit and is the same level that was dismissed by the legislature last year. Neither the stakeholders in the Iowa pork production industry nor the taxpayers of Iowa are being served by this type of arbitrary mandate from the DNR. I highly encourage you to base your policies on good, sound science when available and establish the proper protocols to assess situations where immediate data is insufficient. This means the placement of monitoring equipment and the evaluation of the subsequent information in a context of statistically valid parameters.

Mr. Bunton, I fully realize your role is to regulate and oversee all industries through the eyes of environmental stewardship. The pork industry has demonstrated both a willingness and ability to exhibit responsible behavior for the best interests of all Iowans. We lead the nation in the production and processing of wholesome and nutritious pork products. Without a scientific foundation, we run the risk of allowing varying personalities and biases to establish shallow policies with fragile footing. This is an area too important to leave to the sway of the prevailing political winds. Iowa needs more than patchwork policies and rhetorical statements. We need to follow the framework established by the CDC and continue to study all facets of input regarding quality of life questions.

I encourage you to exhibit leadership in this arena and base your decisions on science or use scientific methods to find the answer.

Best regards,


Joseph Kerns
3216 Sumac Cir
Ames, IA 50014

RECEIVED

MAR 23 2004

March 5, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Rd, Suite 1
Urbandale, Iowa 50322

Dear Mr. Bunton:

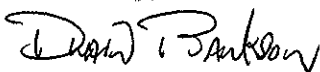
It is appropriate that I respond to the proposed hydrogen sulfide rule for livestock production operations. I have worked in the livestock industry in several capacities for over 30 years. I've watched and participated in industry changes that have been good for the producer, community and the consumer. Therefore, based on my observations and experience, I disagree with your proposed air quality standard of 15 ppb for hydrogen sulfide. This standard has no scientific basis and therefore will not benefit any livestock producer or associate in the state of Iowa.

Before the IDNR jeopardizes the grain and livestock industry of the #1 production state in the Midwest, you need to complete a field study which will help us determine if there is a health risk. Your proposal, as it stands, is honestly not rational and obviously laced with politics and bad, emotional information from special interest groups.

Rural America is still the best place to raise livestock to satisfy a hungry world. Iowa is rural America and has illustrated the balance between livestock, grain and other allied industries have worked for generations. I urge you to follow through with your mandate from Senate File 2293 and complete the study.

To that end, let's be reasonable in your proposed standard and base it on sound science.

Sincerely,



Dwain Bankson
Alden, IA

RECEIVED

MAR 23 2004

February 23, 2004

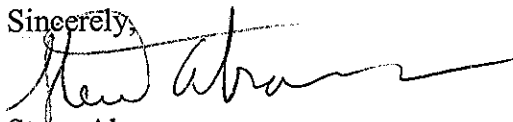
Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road
Urbandale, IA 50322

Dear Mr. Bunton:

I am writing regarding the DNR's Hydrogen Sulfide standard. This is the first time I have ever provided public comment to the DNR. The reason for my writing is concern over the fact that the DNR would step outside their purview and try to force an arbitrary, blatantly political standard on the state of Iowa. I am mystified how the Department of Natural Resources sees its mandate and authority superseding that of the State Legislature and CDC. I believe this is the same concern that led the legislature to rebuff the DNR and nullify its standard. It is my understanding that despite this action by the legislature, the DNR is still pursuing a field study on sulfide emissions. Given, the DNR's attempt to establish political standards without completing a scientific study; I am not surprised that the study would lack even the basics of a scientific approach. The DNR is not even monitoring air quality at the location designated by Iowa law. How would you know health is impacted if you do not take the measurements at the home? Also, what science was used to determine the DNR's exposure level standard? The only justifiable reason for a sulfide standard is the public health, so it seems logical that this question be answered by the governmental agency we tax payers mandate. In case the DNR does not know who that is; it would be the Department of Health and the U.S. Centers for Disease Control.

I will support air quality rules that would apply to all industries if they are in compliance with Iowa law and the standards are developed with the support of solid science.

Sincerely,



Steve Abrams
1410 80th St.
Hampton, IA 50441

RECEIVED

MAR 23 2004

February 23, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

Dear Mr. Bunton:

I am very concerned with the DNR's proposed air quality standard. The 15 ppb standard is not consistent with recommendations established by the US Centers for Disease Control. The Iowa Legislature agreed these were unreasonable standards when they nullified the Iowa DNR's air quality standards last year.

Being a livestock producer in Iowa, I am very concerned that unreasonable standards will only drive our business out of the state. I agree we need standards to protect our environment. These standards must be based on solid science not emotions.

Sincerely,



Brian Qualley
2511 Ellis Ave.
Iowa Falls, IA 50126

RECEIVED

MAR 23 2004

February 21, 2004

**Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322**

Dear Mr. Bunton:

I am responding to the DNR's proposed air quality standard of 15 ppb for Hydrogen Sulfide. I believe these standards are far too strict. They are not consistent with the levels established by the U.S. Centers for Disease Control!

Back in the early 90's, my husband and I moved out of Iowa to find good quality jobs in the livestock industry. A few years later, we had the opportunity to move back to our home state in pursuit of our dream: to be closer to our families and to raise our children in a state where education, family values, and the quality of life is of the up most importance.

These proposed regulations could cause Iowa to lose even more of it's young population as they would be forced to find work in their area out of state.

I believe in consistent air quality control. I also believe this proposal needs more specific scientific study based on scientific fact. This proposal would have detrimental effects on the Iowa economy and the loss of Iowa's most precious resource: the next generation.

Sincerely,

Mary Qualley

**Mary Qualley
2511 Ellis Ave.
Iowa Falls, IA 50126**

**RECEIVED
MAR 23 2004**

Mr. Buntan,

My name is Bret Rice and I am the
the Manager at Sows 1a. For 1a. Select Farms. I am
a Father of 2 and a very close resident (100 yards)
of 1a Select Farms. As employees, Residents of
our Community we all share in concerns that
these issues have brought up. I For one do
not agree with your findings nor do I agree on
how you found them based on your science. I do
agree that we all need to come together + find
a common ground. As a employee of 1a Select
Farms, I'm a 100% committed to what we do! We
provide good Jobs, and we are 100% committed to providing
a safe + healthy environment! We do not need
to be on opposite sides on these issues, we need to
be working together!

Thank you
Bret Rice.

RECEIVED

MAR 23 2004

March 1, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

Dear Mr. Bunton:

With regard to the air quality standard you have set as the "bar" by which hydrogen sulfide will be measured, I feel that because your proposed standard of 15bbp for hydrogen sulfide for only 8 hours a year is not based on science or consistent with even the most conservative levels established by the U.S. Centers for Disease Control that you should first complete the field study before you decide to impose these regulations. I work in the pork industry and am very disturbed that you are attempting to regulate this industry without conducting thorough studies to decide if there even is a health concern or not.

Pork production is very important to this state and it employs a lot of people who are all as concerned about our health and quality of air we breathe as you are. We would be happy to follow and support the rules and regulations you set up provided they are based on substantiated research and the Iowa law rather than the activist groups who oppose pork production in Iowa.

Sincerely,

Lisa Lindaman
20099 270th Street
Hubbard, IA 50122

RECEIVED

MAR 23 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale Ia. 50322

Dear Mr. Bunton

Recently in commentary that I heard on WHO Radio's noon broadcast, Gary Wergin elaborated on the DNR's attempt to "push" new standards for Hydrogen Sulphide levels. The DNR's proposed 15 parts per billion (for 8 hours per year) was "thrown out" by the legislature last year because it was not supported by sound science. The U.S. Center for Disease Control says that even sensitive segments of our population such as children with Asthma and elderly people are at risk being exposed to Hydrogen Sulphide levels at 30 parts per billion for 14-365 consecutive days, not 15 parts per billion for 8 hours as the DNR has proposed. I feel strongly that the DNR should test residences near Production Livestock operations **not** within separation distances already established by the DNR, and then make recommendations to the Legislature based on those findings.

I have been involved in production agriculture most of my adult life and I would support changes in air quality standards for Livestock Production after field studies have been completed based on sound science.

With population in rural Iowa declining, if we force untenable regulations on Livestock Producers in rural Iowa it will negatively affect their ability and desire to stay in business adding to the decline of rural Iowa.

Please don't hesitate to call me with your question.

Sincerely,



Corky Feuerbach
307 Franklin St.
Ackley Ia. 50601
Phone:641-847-2300

RECEIVED
MAR 23 2004

February 18, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

Dear Mr. Bunton:

I tried to understand why you insist on imposing and setting for air quality, your proposed air quality standard of 15 ppb for Hydrogen sulfide, If this standard is not consistent with the most conservative levels established by the U.S. center for Disease Control. For this reason, I think the first step to create a standard for our industry, is conducting a study by science, with a experimental University to determine if there is a public health problem.

Air Quality monitoring should be conducted at separeted location, inclusive at neighbor's residence. The DNR don't have valid information about the level of exposure.

I know that the pork industry follow the rules and regulations all the time, about quality enviroment, and they are based on science and always take into consideration healthy life for lowans.

Standards need to be based on good science, please conduct the monitoring study, determine if a problem exist. The industry is important to the state and over regulation will hurt the industry and state.

Sincerely,



Gustavo A. Alvarez
1222 Water St. Apt. 1
Webster City, IA, 50595

RECEIVED

MAR 23 2004

March 11, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road
Urbandale, IA 50322

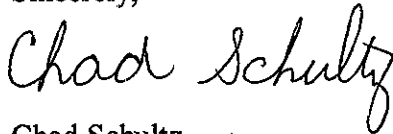
Dear Mr. Bunton:

I have never provided public comment to the DNR before, however I feel that it is necessary to do so now since I oppose the 15 ppb standard. I don't feel that it's consistent with levels established by the U.S. Centers for Disease Control and is more restrictive than other states' regulations that are actually enforced.

Last year the Iowa Legislature made its opinion very clear when it nullified your air quality standards. Yet you continue moving forward. As a pork producer, nothing is more important to me than the health and well being of all Iowans. As a producer, I'm committed to clean air and a quality environment for my friends and family. Your standard sends an incorrect message to all Iowans that this is a necessary level to protect the public health, when in fact we know that this is clearly a political standard, not a health standard.

I strongly encourage you to rethink your actions and request that you complete your field study before you consider imposing air quality standards on Iowa producers. I will also support any rules and regulations that are based on good solid science, not activist group pressure.

Sincerely,



Chad Schultz
1040 Elm Street
Webster City, IA 50595

RECEIVED

MAR 23 2004

March 9, 2004

Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road
Urbandale, Iowa 50322

Dear Mr. Burton:

This letter is in response to the DNR's proposed hydrogen sulfide rule for livestock production. I have worked in the livestock field most of my career and I do not support the 15 ppb standard you propose.

I do support the DNR conducting a field study of livestock air emissions, but request that the DNR complete their field study before deciding to impose more regulations on animal agriculture. The proposed standard of 15 ppb for hydrogen sulfide for 8 hours a year is not consistent with levels established by the U. S. Centers for Disease Control of 30 ppb of hydrogen sulfide for 365 consecutive days. The CDC states that sensitive populations are at minimal risk with their guidelines of 30 ppb of hydrogen sulfide for 365 consecutive days. The proposed standard of 15 ppb for 8 hours per year seems to be a political standard, not a health standard.

I hope that you will reevaluate your current standards for hydrogen sulfide emissions in livestock production. Standards, of which, were nullified by the Iowa Legislature last year. We can both agree that nothing is more important than the health and well being of Iowans. Please consider adopting the emissions guidelines set forth by the Centers for Disease Control. Thank you for your time in considering this very important matter.

Sincerely,



Madeline Bunn
621 16th Street
Nevada, Iowa 50201

RECEIVED

MAR 23 2004

February 23, 2004

Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road
Urbandale, IA 50322

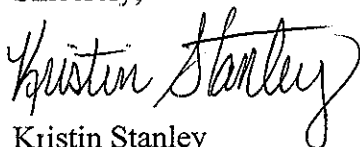
Dear Mr. Bunton:

I am writing this letter in response to the DNR's proposed hydrogen sulfide rule for livestock production. I do not support the 15 ppb standard as it is not based on science.

For as long as I can remember, farming has been a major part of Iowa which is the major reason my family chose this state when relocating from Missouri 6 years ago. Livestock farming is an important part of Iowa's economy, and this is why the proposed standard troubles me. It is not consistent with what the United States Centers for Disease Control states are safe ppb and exposure rates. All that I'm requesting is that tests be ran at these facilities neighbor's residences as mandated by law and that the study be based on science.

As a fellow Iowan, it is as important to me and my family to have good air quality, as it is to anyone. Please conduct the monitoring study, determine if a problem exists and then base the standards on science, not activist group pressure and agendas.

Sincerely,



Kristin Stanley
401 Main St.
Jewell, IA 50130

RECEIVED

MAR 23 2004

Sows04

February 26, 2004

Bryan Buton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road
Urbandale, IA 50322

Dear Mr. Bunton:

I am writing this letter in respose to the DNR new health standard for hydrogen sulfide 15ppb for 8 hours. I feel that there has not been enough scientific study to inact this proposal. Pork production is a big Industry in the state of Iowa and is the livelyhood of many lowans and thier families and supports comminunities in which they live. I feel it is important that lowans have good air quility and a clean enviroment in which to raise thier families. I am in support of regulations, but they need to be backed up with scientific evidence that support the claim.

Sincerely,



Tom Daily
916 3rd street NE
Belmond, IA , 50421

RECEIVED
MAR 23 2004

March 8, 2004

Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road
Urbandale, Iowa 50322

Dear Mr. Bunton,

I was born and raised on a grain/livestock farm in southern Iowa, and have worked in the swine industry for over 25 years, nearly all of that time in Iowa

I have seen over the years how the payroll check from employees and employers in Iowa's swine industry roll over in the small rural towns and even the large cities in this state. Yet time after time the swine industry is under attack by someone attempting to regulate the industry in which I make my living.

I feel the IDNR has not done their homework on the proposed air quality standard of 15 ppb for hydrogen sulfide. I am aware, that last year the Iowa Legislature nullified the IDNR air quality standards for hydrogen sulfide.

I would suggest that the IDNR follow Iowa law and base standards on good science before your department decides to regulate the swine industry. I am also very concerned when the IDNR is proposing a duration exposure level of only 8 hours per year without any justification at all, even when conservative health screening standards call for exposure levels at 30 ppb for up to 365 days per year without health risks.

I urge you to do the research, study the information collected, and determine if there is an air quality problem in our industry, and how we can all work together to improve this situation

Producers are more than happy to change, but trying to regulate our industry without doing the homework would be a very costly mistake to us, as producers, and consumers in this state.

In closing, I suggest that the large regulating bodies in this state do no forget that Iowa was founded because of its' great agricultural value to this country and to the world

Sincerely,



Steven M. Jacobsen
703 5th Avenue NE
Belmond, Iowa 50421

RECEIVED
MAR 23 2004

To Whom it May Concern;

Good air quality in Iowa, is
a very important issue.

The proposed 15 PPD standard
by the DNR, is not truly
based on facts.

More studies need to be
made before any ruling
is made.

Sincerely,

James Nizer
1704 VIOLET AVE.
THAYER, IOWA
50254

RECEIVED

MAR 23 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

Dear Mr. Bunton:

This letter is in response of the DNR's proposed air quality standard of 15 ppb for hydrogen sulfide. I do not support this new standard set by the DNR. There is no scientific backing to even pursue this to the Legislature. If someday the DNR has something to go off of with science backing it may need to have some changes made. If the DNR is here to make Iowa a better place to live, is the DNR going to hire all the people they are trying to put out of work?

The production of livestock in Iowa is one of the leading businesses in Iowa. With out livestock producers here there will be no need for the DNR because most of the people in the state will have moved on to a different state so they came raise livestock the way they know how, and the DNR isn't trying to run them off. There are many hard working families this will affect. If someday you come up with a reasonable Hydrogen sulfide proposal that is with science backing them you can take it to the Legislate.

Sincerely,
Curtis R Widmer
20644 N. 1st ST.
Decatur, IA 50067

RECEIVED

MAR 23 2004

Dear Mr. Buxton

I disagree with the proposed public
air quality standard of 15 ppb. There
is no backing that I am aware of
at this time

Julie Chankulai
1535 115th Av
Murray Ar
50174

RECEIVED

MAR 23 2004

February 25, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

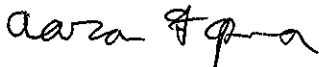
Dear Mr. Bunton:

I am a livestock producer in north central Iowa. I am writing this letter in response to the proposed air quality standards concerning hydrogen sulfide. I do not support the standard of 15 ppb as it is a level that is not based on science. It is not consistent with the levels established by the U.S. Centers for Disease Control.

I have learned that the DNR is not even monitoring for hydrogen sulfide at the neighbor's residence. How will we know if our neighbors are affected when we are not taking measurements near their homes?

As a resident of Iowa and a neighbor to many large hog confinements, air quality is an important concern of mine. I am willing to support air quality rules as long as they are based on a true scientific study and are in compliance with Iowa law.

Sincerely,



Aaron Fopma
2515 165th St
Blairsburg, Ia 50034

RECEIVED

MAR 23 2004

Dear Mr. Buntor:

I am in disagreement with the new air quality propposement.

As a person who has been on the family farm and has work on the factory farm, the quality of air is better on the factory farm. For many years back there has been hogs produced in Iowa. Just now we are concerned about air quality just because a few people out of the city has moved to ~~the country~~ and gripe because it smells.

As a hog producer I don't want to see this proposal go any further.

Sincerely
Todd Raney

Todd Raney
812 2nd St.
Lorimor IA. 50149

RECEIVED

MAR 23 2004

March 9, 2004

Mr. Brian Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, Iowa 50332

Dear Mr. Bunton:

I am writing in regards to the air quality bill that was discussed in a public hearing at the Capitol yesterday. I attended this hearing with some fellow employees and am now writing to voice my opinion and ask that you reassess the proposed standard and base it on scientific studies.

I don't pretend to know much about farming and issues that go on in the agricultural world. I am a pork producer, but work on the accounting end of it. But when Peter Thorne gave the analogy of air pollution to the speed limit (as printed in *The Des Moines Register* this morning), that's not comparing apples to apples and is just an asinine comment—anybody, even me, can see that. Iowa is an agricultural state and always has been. There is livestock here. There are crops here. Do we regulate the acres of corn and beans that we grow because of the pollen count in the air, stating that we're making people with allergies "sick"? No.

I think that air quality is important in Iowa. I have a small child and want her to live and prosper here. Please conduct your study to see if there is a harmful amount of pollutants in the air, but don't base your study on the personal opinions of others, certain support groups, or radical activists. Make it based on science and not a preconceived notion that there is a problem. Thank you for your time.

Sincerely,



Jessica Ouellette
822 Woodland Ave
Iowa Falls, Iowa 50126

RECEIVED

MAR 23 2004

February 20, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road
Urbandale, IA 50322

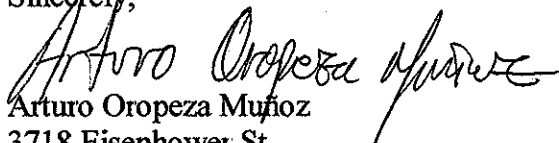
Dear Mr. Bunton:

I need help to understand what is the basis for the standards you are setting for air quality. Your proposed air quality standard of 15 ppb for Hydrogen Sulfide is not consistent with even the most conservative levels established by the U.S. Centers for Disease Control. Creating a standard for our industry without first conducting a thorough study to determine if there is a public health problem is premature and perhaps irresponsible.

Is the air quality being monitored at the neighbor's residence? How will we know if the neighbors are impacted if you do not take measurements at their home? I also do not understand the proposed exposure level standard. This level is not based on science and should be revised.

I would like to see rules in place and I will support air quality rules for livestock production if the study is completed in compliance with Iowa law and the standards are developed with the support of solid science.

Sincerely,


Arturo Oropeza Muñoz
3718 Eisenhower St
Ames Iowa 50010

RECEIVED
MAR 23 2004

March 20, 2004

TO: D. N. R.

We support strong AIR QUALITY STANDARDS. The D N R IS THE ONLY WAY that an individual can get help. The factory farms and corporate agri-business and hog confinements will not.

We are full time farmers and live close to 4 Hog Confinement Sites -- 3 of which touch our land.

The smell stays in our attached garage. When my husband, my son, myself and my daughter-in-law are working the fields - the smell is constant. At meal times - we can't eat our lunches in the tractors -- we get in pickups and drive to another area to get away from the smell.

Can you imagine the smell that stays when they empty their pits? I am a healthy woman but there are times I throw up and I wonder why ---- It has to be the air that affects me.

Ammonia and Hydrogen Sulfide must be dangerous -- Why else are fans running constantly in the confinement buildings?

We are full time farmers and we want agriculture to prosper.

If the surrounding states can have strong air standards -- then why can't Iowa have strong air standards.

We support the air standards proposed by the D N R. Please don't weaken the regulations. What happens to our air will affect the lives of all Iowans -- in town and in the country.

Thank you for reading this.

Sincerely,

Donald D Bonner
Bonnie Bonner

DONALD D. BONNER
BONNIE J. BONNER

10732 -- 170th St. S.
SWALEDALE, IOWA 50477

RECEIVED
MAR 23 2004

February 18, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, Ia 50322

Dear Mr. Bunton:

I am an employee of a pork producer who would like to comment on the proposed air quality standards of hydrogen sulfide. These standards established by the IDNR were thrown out by the Legislature last year, as they apparently were not based on good science.

My concern is that the 15ppb is not consistent with the levels established by CDC, who say that even sensitive populations such as children with asthma are at minimal risk being exposed to 30ppb of hydrogen sulfide for 14-365 consecutive days, not 15ppb for 8 hours per year as proposed by the DNR. Also, this standard proposed by the DNR would send a message to Iowans that is incorrect.

This issue affects not only the physical and financial well being of pork producers, but Iowa as a whole. I urge the DNR to complete their study before imposing more regulations on pork production. We need standards based on good science

Sincerely,



Ron Roach
2629 290th Street
Jewell, Iowa 50130

RECEIVED
MAR 23 2004

February 18, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

Dear Mr. Bunton,

This letter is in response to the DNR's proposed rule for livestock and hydrogen sulfide. I do not support the 15 ppb standard that is being proposed. I encourage the DNR to complete their field study before imposing air quality standards for Iowa livestock producers.

I found an opportunity for myself and my family here in Iowa in the livestock industry. But with the new rules and regulations proposed, this could hurt all producers. Iowa depends on livestock production, it is an important part of the economy. This regulation should be based on a scientific study, not a political statement.

As a pork producer I am committed to clean air for all Iowans. Please conduct the study before imposing rules that could hurt the livestock industry.

Sincerely,

Shawn Chaplin
31565 D Ave
Radcliffe, Iowa 50230

RECEIVED

MAR 23 2004

March 10, 2004

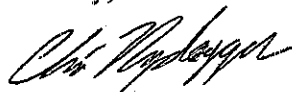
Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, Ia 50322

I am a pork producer that is responding to the DNR's proposed hydrogen sulfide rule for livestock production.

The 15.ppb standard is not based on science and from what I hear you have been monitoring at locations other than the neighbor's home.

I am disappointed in your attempt to unfairly regulate the pork industry in Iowa. It is important to everyone to have good air quality in Iowa, please finish the monitoring study first to see if there is a problem and base the standard on science.

Sincerely,



Chris Nydegger
1404 Union St.
Webster City, Iowa 50595

RECEIVED

MAR 23 2004

February 19, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

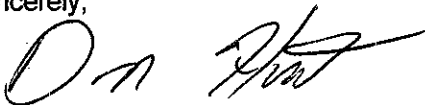
Dear Mr. Bunton:

I am an Iowa pork producer and would like to comment on the proposed air quality standard of 15 ppb for hydrogen sulfide. As a pork producer I would encourage you to reconsider the proposed standard.

I am a livestock producer that grew up in Iowa, but left the state to pursue other opportunities in the pork industry. After several years, I returned to Iowa. I was able to find new opportunity here in the state of Iowa. I am committed to clean air and a quality environment. I support rules and regulations that are based on good science. However, I am disappointed in that you would propose a standard without conducting a thorough study and in compliance with Iowa law.

Animal production is very important to the well being of many Iowa people. We need to base our standards on quality science and thorough studies, before standards are issued.

Sincerely,



Don Hunt
3245 Inkpaduta Ave
Stanhope, IA, 50246

RECEIVED

MAR 23 2004

March 17, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

Dear Mr. Bunton:

I would like to take a moment of your time to present my view on the proposed by DNR air quality standard of 15 ppb of Hydrogen Sulfide. The problem I have with this proposal is that establishing so conservative Hydrogen Sulfide level has no scientific basis. Studies that DNR is basing their opinion on were not conducted properly to make any logic conclusion of possible thread to public health.

In addition, implementing such strict regulation will adversely affect Iowa Pork producers, their families and in effect is going negatively influence global Iowa economy. Last year Iowa Legislature voicing opinion of Iowans refused to incorporate DNR proposal into the law. This year once again using taxpayers' money, DNR attempts to influence legislature and over regulate the pork industry.

It is important to me, my family and all of us to preserve and promote clean air in Iowa. Therefore, I will support Hydrogen Sulfide levels regulation based on sound science and not based on the opinions of politicians and environmentalists. Please reconsider your actions.

Sincerely,



Marek Gotszling
4736 Candlewick Dr
Norwalk, IA 50211

RECEIVED

MAR 23 2004

February 19, 2004

Bryan Bunton
Iowa Department of Natural Resources
7900 Hickman Rd, Suite 1
Urbandale, Ia 50322

Dear Mr. Bunton:

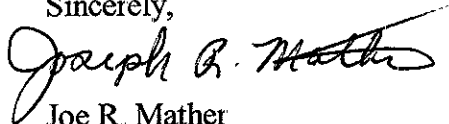
I am a pork and beef producer in central Iowa. This is the first letter I have ever written to anyone in public office or associated with state government.

I am concerned about the new health standards for hydrogen sulfide the DNR is trying to establish. The 15ppb standard is not based on science and has already been turned down by the Iowa Legislature.

The Iowa livestock industry is already the most regulated in the United States. I am concerned about air quality and being a good neighbor, but I feel that any new regulation should be based on sound science.

We are talking about the #1 industry in the State of Iowa. We should impose regulation based on fact, not on political fiction.

Sincerely,



Joe R. Mather
18385 590th ave.
Nevada, Ia 50201

RECEIVED

MAR 23 2004

March 15, 2004

Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road
Urbandale, IA 50322

Dear Mr. Bunton;

I am writing in regards to the "new" health standard for hydrogen sulfide that is being proposed by the DNR. The proposed standard of 15 ppb for hydrogen sulfide for only 8 hours a year is not even consistent with the levels established by the U.S. Centers for Disease Control.

I live, work and am raising a family in a small town. Air quality is important to me, but the standards should be appropriate and based on accurate data that's been gathered fairly. So finish the three-year study and do the monitoring from the neighboring residences before imposing air quality standards on Iowa producers.

Sincerely,

Tatum Swenson
712 Main St.
Iowa Falls, Iowa 50126

RECEIVED

MAR 23 2004

February 20, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
2900 Hickman Road
Urbandale, IA 50322

Dear Mr. Bunton;

As a producer in Iowa, I was amazed at the DNR's proposed rule for 15 ppb. When it is said that it is a "benchmark" to work off of, how can that be? Shouldn't the "benchmark" be established off of scientific studies?

The law states that monitoring should be done at the neighbor's home. The only way anyone would know the exposure level, is to do it at correct locations.

I live in a small community in N.W. Iowa. Air quality is very important to me and my family. Base your study on true and accurate science.

Sincerely,

William H Wurr

416 Radston

Laurens, Iowa

50554

RECEIVED

MAR 23 2004

February 26, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

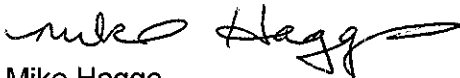
Dear Mr. Bunton:

I am writing in response to the DNR's proposed hydrogen sulfide rule for livestock production.

Livestock production is important to the State of Iowa and I feel you are unfairly regulating agriculture. The proposed standard is inconsistent with the University Report and the proposed duration exposure level is far too conservative. Why are you monitoring at locations other than the neighbor's residence near their home, as required by law?

It is important to all of us to have good air quality in Iowa. Please conduct the monitoring study to determine if a problem exists and then base the standards on good science.

Sincerely,



Mike Hagge
2503 Linden Avenue
Iowa Falls, IA 50126

RECEIVED
MAR 23 2004

To whom It Concerns,

3-11-04

I disagree with the new proposed Standard of hydrogen Sulfide.

This 15ppb is not science.

I am a livestock producer, and livestock for the state of Iowa is very important.

Please reconsider the proposed standard.

Sincerely

Dave Ward

P.O. Box 13 3065th St

Trayer, IA 50254

RECEIVED

MAR 23 2004

2/26/04

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite #1
Urbandale, IA. 50322

Mr. Bunton,

I would like to voice my opinion on the DNR's hydrogen sulfide rule for livestock production. I think the standards need to be reconsidered for the proposed rule. The 15ppb are not based on any studies. A study of air quality needs to be monitored at the location designated by Iowa law. This would be at the neighbor's homes. How can we possibly know if someone is impacted if there are no measurements taken where they live? We need to find out if there is a health problem before we create a standard for the industry. This industry is important to me and to the state of Iowa. I normally would not voice my opinion, but this is where I live, and this is what I do to make a living here in the state of Iowa. I am a livestock producer, and this affects me. I would be in favor of air quality rules for livestock production only if a study is conducted in compliance with Iowa law, and the standards are made with supporting studies that have been conducted. Please take another look at this issue, and do the studies to see if there is a health risk. If we have over regulation on this industry it would be bad for me and for the state of Iowa.

Sincerely,

Mike Murphy
16726 Hwy. D-41
Alden, Iowa, 50006

RECEIVED

MAR 23 2004

February 18, 2004

Mr Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road
Urbandale, Iowa 50322

Dear Mr. Bunton:

This letter is in response to the "new" health standard for Hydrogen Sulfide as proposed by the Iowa Department of Natural Resources.

As a Iowa pork producer I support the states rules and regulations as a guideline to save the environment and the quality of living of all taxpaying citizens. However I do believe that the rules and regulations, must be appropriate, fair and must be based on science. The levels proposed by the DNR fall far short of that criterion.

As a rural resident I would hope that your field of study had a wider range than that of one square mile of a livestock production facility. I'm not sure you can fairly establish standards for the entire livestock industry and assure a quality environment for our rural neighbors.

Please take into consideration to revise your proposal of 15 ppb. Base your decision on scientific studies, monitor your findings and define a problem if one exists?

Sincerely,

Melissa Bates
19071 125th St
Alden, Iowa 50006

RECEIVED

MAR 23 2004

February 24, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road
Urbandale, IA 50322

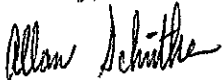
Dear Mr. Bunton:

I would like to take a moment of your time to address the new proposed air quality standard. I feel the proposed standard of 15 ppb for Hydrogen Sulfide for the swine industry is unfair and biased. This standard is not based on any facts, and is not even close to standards set by the U.S. Center for Disease Control.

I am a livestock producer, and a resident in the state of Iowa. The quality of life I enjoy is very important to me in our state. As a producer I work very hard to protect the environment, and abide by the laws established. However, I feel these laws should be fair, and apply to all industry in the state. I would like to see field study conducted, and safe levels confirmed with actual data before laws are imposed.

The livestock industry is the backbone of the state of Iowa. The scope of jobs in this state related back to agriculture is overwhelming. Establishing strict unsubstantiated standards will send the wrong message to Iowans, and outside industry alike that Iowa is not a friendly state to do business in. Please set fair standards that everyone can live with and abide by.

Sincerely,



Allan Schnitker
10736 EE Ave.
Alden, IA, 50006

RECEIVED

MAR 23 2004

February 23, 2004

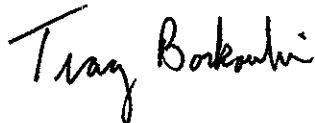
Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road
Urbandale, IA 50322

Dear Mr. Bunton:

I have been working with pigs around 24 years. I have worked on small family type farms and large confinement type farms. It doesn't matter size, pig manure smells. Putting unrealistic standards on hydrogen sulfide would be unfair to all producers. Your proposed air quality standard of 15 ppb for Hydrogen Sulfide is not consistent with even the most conservative levels established by the U.S. Centers for Disease Control. I do not understand how you can possibly create a standard for our industry without first conducting a thorough study to determine if there is a public health problem. Working so closely with pigs for the past 24 years has not caused any health problems to myself or family.

I don't have a problem with rules as long as they are realistic. Rules are in place to protect people and the environment not made in the interests of a few people who don't like the smell of agriculture.

Sincerely,



Tracy Borkowski
20001 135th St.
Iowa Falls, IA 50126

RECEIVED

MAR 23 2004

March 3, 2004

Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road
Urbandale, IA 50322

Dear Mr. Bunton:

I am an Iowa pork producer and would like to comment on the proposed air quality standard of 15 ppb for hydrogen sulfide. I am aware that the IDNR established air quality standards last year for hydrogen sulfide and the Iowa Legislature nullified the rule. Now, you are proposing to use the exact hydrogen sulfide standard that the Legislature nullified. This information is not based on science.

When the Iowa Legislature nullified your proposal last year it made its opinion very clear. They requested the IDNR to base standards on good science and stay within the boundaries of Iowa law. However, the IDNR continues to monitor hydrogen sulfide at various distances from farming operations rather than at the neighbor's residence as stated in the law. The IDNR is also proposing a duration exposure level of only 8 hours per year without any scientific justification, when very conservative health screening standards call for exposure levels at 30 ppb for up to 365 days per year without health risk.

To conclude, I am very disappointed in your proposed rule and your attempt to over regulate our pork industry. I strongly urge you to rethink your actions and conduct a scientific study. Use that information to determine if a public health impact is in fact an issue for Iowa and Iowa agriculture.

Sincerely,



Alesha Whitmore
2416 Tollman Ave.
Blairsburg, IA 50034

RECEIVED

MAR 23 2004

February 27, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

Dear Mr. Bunton:

I am responding to the DNR 's proposal on Hydrogen Sulfide, for the livestock industry. The 15 ppb standard is not practical. The amount of research that has been done regarding this proposal is insufficient. We cannot institute this standard with out intensive research.

I believe we are all steward of the environment, and I work for a company that has worked hard to take care of the environment. The bottom line is that this issue should be based on sound scientific evidence. We also need to keep in mind the consequences these regulations have on animal agriculture; the industry that drives this state.

Sincerely,

Tim Cowser
300 1/2 Anderson Street
Jewell, IA 50130

300 1/2 Anderson Street
Jewell, IA 50130
Tim Cowser

RECEIVED
MAR 23 2004

February 18, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

Dear Mr. Bunton:

I am writing this letter in response to the proposed hydrogen sulfide rule for livestock production. I feel the proposed standard of 15 ppb is not based on science and has no research to support this decision.

I have been involved in agriculture my entire life and feel it has been a very interesting and challenging career. I hope to stay in this career and not be forced into something else because of unfair regulations. I think we all know how important livestock is to the state and that good air quality is needed for our existence. I feel standards need to be based on actual science and the proposal should be based close to the levels set by the US Centers for Disease Control.

I recommend that all the studies be done to determine if there is a problem and then base a decision off the actual data collected from the studies.

Sincerely,



Brian Thiesen
20696 G Ave.
Alden, IA. 50006

RECEIVED

MAR 23 2004

February 18, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

Dear Mr. Bunton:

This letter is in response to the DNR's proposed hydrogen sulfide rule for livestock production. I do not support the 15 ppb standard as it is not based on science. As a livestock producer, I encourage you to reconsider the proposed standard.

I am a livestock producer that grew up in Iowa, but left the state to pursue other opportunities in the livestock industry. However, several years ago I was able to find opportunity within the state and return to Iowa. Livestock production is very important to the State of Iowa and I am disappointed in your actions to unfairly regulate animal agriculture. The proposed standard is not consistent with the University Report and the proposed duration exposure level is far too strict.

It is important to all of us to have good air quality. Standards need to be based on good science, please conduct the monitoring study, determine if a problem exist. The industry is important to the state and over regulation will hurt the industry and state.

Sincerely,

Allen Whiley
Allen Whiley
1601 Hidden Valley Dr.
Iowa Falls, IA, 50126

Faint, illegible text at the bottom of the page, possibly bleed-through from the reverse side.

RECEIVED

MAR 23 2004

February 22, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

Dear Mr. Bunton:

I'm writing this letter concerning the new DNR's proposed hydrogen sulfide rule for livestock. I can not support this rule. I hope that you will reconsider the 15 ppb. I do not think that it is fair, to the livestock producers, for you to enforce this rule when it is not based on science.

My husband and I both worked for a livestock company in a couple of different states. About 5 years ago we moved back to Iowa to raise our kids and found a very good opportunity in a livestock company in this state. Being a livestock producer for 10 years, I feel it is very important to follow the states rules and regulations but to unfairly regulate animal agriculture would hurt a lot of people and a lot of businesses. Most of all it would be damaging to the state of Iowa.

Sincerely,

Jennifer Jessen
206 Amanda St.
Radcliffe Ia 50230

RECEIVED
MAR 23 2004

February 23, 2004

Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road
Urbandale, IA 50322

Dear Mr Bunton:

I'm writing this letter to voice my concern over your proposed health standards of 15 (ppb) on hydrogen sulfide emissions / exposure. I'm a 43 yr. Old pork producer from Wright County. I have been a pork producer for over 25 yrs. Our industry has gone through many changes over the past decade. Our industry is also among the most regulated industry in the nation. I'm committed to clean air and water. I'm also committed to regulations based on scientific fact and studies, not someone's political agenda. Iowa doesn't need to loose more jobs. We are first and foremost an agricultural state. Many of our young people are leaving the farm to pursue other careers in the larger cities. We need to keep the pork industry alive in Iowa and moving forward and not heading for extinction! I'm asking that you complete your field studies before imposing air quality standards on Iowa pork producers. It is the right thing to do!

Sincerely,

Brian Hermann
1421 285th St.
Eagle Grove, IA 50533

02/23/04 10:00 AM
BUNTON, BRYAN
AIR QUALITY BUREAU

RECEIVED

MAR 23 2004

February 18, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

Dear Mr. Bunton:

This letter is in response to your department's proposed hydrogen sulfide rule for livestock production units. I firmly believe that the proposed level of 15 ppb as a standard is a broad use of political liberalism and a narrow use of the science and research resources we have access to. As a livestock producer, I strongly encourage you to evaluate and reconsider this proposal.

As a husband, livestock producer, and taxpayer, living in the state of Iowa, I value the agricultural industry that our state relies heavily upon for financial sustenance. By targeting livestock production with standards that fail to utilize modern science research, we as a state are establishing precedence of public misinformation. How can a group of citizens make a decision on right versus wrong when the "decision makers" fail to follow the guidelines dictated by tests that remain incomplete.

I am proud of my heritage of being a hog producer and as the next generation of producers is being raised, let them know by your actions that Iowa is a state that cares about them as much as we do. Embrace the future of hog production. Work with us, the producers, to see how much we value clean air. Technology and modern science will assist you in justifying the appropriate levels of hydrogen sulfide.

Sincerely,



Jason C. Etnyre
570 Indigo Avenue
Alden, Iowa 50006

RECEIVED

MAR 23 2004

February 20, 2004

Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road
Urbandale, IA 50322

Dear Mr. Bunton:

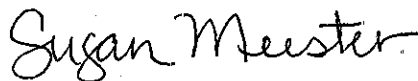
It is with great concern that I would like to address the Department of Natural Resource's proposed hydrogen sulfide rule for livestock production.

As a native Iowan, who grew up on the farm, I feel very fortunate to still be a part of the agricultural sector. I am aware that the DNR established air quality standards that the Iowa Legislature then nullified. At a minimum, I would request that the DNR complete their field study of livestock air emissions before proposing the use of arbitrary hydrogen sulfide levels that were nullified last year by Legislature; because the DNR's position is contrary to that of the CDC and outside the purview of the DNR.

I feel it is necessary for air quality monitoring to be conducted at the residences, therefore we are aware if there is a health impact on neighbors. Monitoring inside this applicable separated distance would not provide valid information.

In closing, I am disappointed in your proposed rule to over regulate the livestock air emissions. I strongly encourage you to rethink your actions and conduct a scientific study, consider the information and determine if a public health issue is in fact an issue for Iowa and Iowa agriculture.

Sincerely,



Susan Meester
408 1/2 2nd Street
Grundy Center, IA 50638

RECEIVED

MAR 23 2004

February 26 2004
Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

Dear Mr. Bunton:

Forty years has changed the swine industry from four to five sows to four to five thousand sows in one spot, from family farms to large corporations, no regulation except keeping them off the road to well everything.

I have been in the swine industry for all these years and I am not surprised of the developments. Some things have improved, some have gotten worse, problems have been solved, and more have risen. So regulation is a necessary evil to keep outsiders happy, and disreputable operations in line.

Now we come to the new regulation for hydrogen sulfide. 15 ppb for 8 hours per year?? What can I say? One potbelly pet pig could break that standard!! Maybe not, but my point is: setting the standard at such a low level prohibits any chance of compliance by anyone, family farms or large corporations. Set the level at the minimal risk of 30 pbb for 14 to 365 consecutive days, a realistic and usable level, then, wait for reliable research and health data before progressing further.



John W G Dickerson
303 North Lee Box 112
Dows Iowa 50071

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MAR 23 2004

March 11, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

Dear Mr. Bunton

This letter is in reards to the DNR's proposed hydrogen sulfide rule for livestock production. I do not see how you can justify the 15 ppb standard when the CDC states that even sensitive populations such as the elderly and even children with asthma at minimal risk after being exposed to 30ppb for 14-365 consecutive days. This is quite a difference from your 15ppb 8 hrs. per year.

Livestock production is important to Iowa's economy and I am worried that if you unfairly regulate agriculture it will not be good for Iowa's economy. Also when you take these readings I understand that the law requires you totake them form the neighbor's residence near their home, which you are not.

Air quality is important to me and I am willing to do my part, as long as the standards set are with good science, not activist group pressure or the agenda of activist university professors.

Sincerely,



Mike Tate
409 W. Kansas
Afton, Ia 50830

RECEIVED
MAR 23 2004

February 25, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road
Urbandale, IA 50322

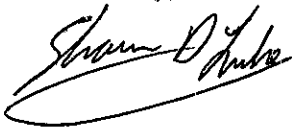
Dear Mr. Bunton:

This letter is in regards to the proposed 15 ppb hydrogen sulfide air levels. Is this the same level that was thrown out last year? Are there any studies that support these levels? These levels seem very low and inconsistent with recommendations in the University Report.

I feel that clean air is very important to my family's well being. I also feel that any rules or laws placed on any industry that are not based on science or research are unfair to that industry. We must all follow guidelines when making proposed rules or regulations. The DNR has not followed those guidelines this time. Lets get more scientific backed research before moving forward on this issue. Let's also not forget what the livestock industry brings to Iowa before trying to force them out with ridiculous laws and rules.

I would at this time like you to reconsider your proposed levels. This could have a very negative effect on Iowa's work force and it's economy. Sometimes we forget how important this industry is to the State of Iowa. Don't make decisions without proper studies done first.

Sincerely,



Shaun D Lukes
416 SE 4th St.
Eagle Grove Ia,
50533

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MAR 23 2004

March 11, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

Dear Mr. Bunton

I do not support your proposed 15ppb of hydrogen sulfide rule. To my understanding this is the exact same law that you tried to pass last year and was nullified.

Iowa livestock production is important to me as this is my job. If you unfairly regulate this it concerns me that not only my job, but the other thousands of livestock production employees across the state may be in jeperody.

I strongly urge you to rethink your proposed law, and use a scientific bases for which you obtain your data. This is something that effects all Iowans.

Sincerely,



Mike Chamberlain
105 5th St.
Murry, IA 50174

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MAR 23 2004

February 19, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

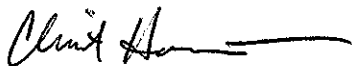
Dear Mr. Bunton:

I am writing in response to the DNR's proposed hydrogen sulfide rule for livestock production. I do not support the 15 ppb standard as it is not based on science. As a livestock producer, I encourage you to reconsider the proposed standard.

Livestock production is important to the State of Iowa and I am disappointed in your actions to unfairly regulate agriculture. The proposed standard is not consistent with the University Report and the proposed duration exposure level is far too conservative. In addition, you have been monitoring at locations other than the neighbor's residence near their home, as required by law.

Nothing is more important than the health and well being of Iowans. Please conduct the monitoring study, determine if a problem exists and then base the standards on good science, not activist group pressure or the agenda of activist university professors.

Sincerely,



Clint Hoversten
405 E. Minnie St.
Radcliffe, IA 50230

RECEIVED
MAR 23 2004

3/23/04

Dear Mr. Burton,

I'm writing to you and the DNR about the livestock ambient air quality. I feel livestock producers need to take proper care of their animals, farms, and facilities. I also feel however, that any air quality standards made should be based on sound scientific testing and not personal opinions and questionnaires.

Agriculture is very important to this state and country. Air quality is also important to everyone but, I hope that any standards fair and just.

Respectfully,

Inaya Marshall
Michael H. Marshall
58253 Quincey rd
Lewis Ia.
51544

Dear Mr. Buntou

Air Quality issues are important to The state, I agree however air quality standards The state has are the ones that should be imposed, not The DNR's who have no scientific proof of health concerns. I also feel that The DNR needs to monitor air quality from locations designated by Iowa Law and not of their choosing.

The DNR should conduct and complete all of their studies before even considering imposing air standards. DNR officials have got to act on what is Law Not on their own policies.

In closing I am a family man with a wife and 2 kids, I live in an area with numerous livestock operations and The air quality is not an issue under current state laws, because you can't even tell that they are there.

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MAR 23 2004

Thank You

Kevin Long
P.O. Box 33
Cylinder IA. 50528

From: "Shirley McIntosh" <bearly@fbx.com>
To: <bryan.bunton@dnr.state.ia.us>
Date: 3/24/04 6:08AM
Subject: Clean Air and Hydrogen sulfide

Subj: Written comments to DNR regarding air quality public hearing held in Mason City, IA on March 3rd

Following are my comments regarding the proposed 15 parts per billion hydrogen sulfide rule. I think DNR is trying to do their job but Farm Bureau is telling its members to fight this issue because Farm Bureau makes big money from these people that have the large feeding lots in the form of big insurance premiums.

Industrialized agriculture is an extraction business that externalizes its social and environmental costs onto communities. Degradation of water quality, air quality and public health results in a diminished quality of life.

CAFOs routinely produce as much waste as a city, yet are not required to treat it. The pollution strength of raw manure is 110 times greater than that of raw municipal sewage. (EPA-821-b-01-001)

When animal waste is treated or stored in large quantities, the decomposing liquid manure releases some 400 volatile organic compounds, including, hydrogen sulfide (H₂S). When gases and toxins are carried by the wind to neighboring homes, the emissions can have detrimental effects on the neighbors' quality of life and their mental and physiological health. (www.chron.com/content/chronicle/nation/h2s/index.html)

Provisions in the Clean Water Act and the Clean Air Act require CAFOs to be regulated and monitored by the state environmental agency. How many National Pollution Discharge Elimination System Permits (NPDES) have been issued to CAFOs in the state? General NPDES permits shouldn't be available for CAFOs meeting the criteria defining concentrated animal feeding operation as they only apply to less than 1000 animal units.

Livestock integrators should be held accountable and legally liable for the environmental damages associated with CAFOs.

23 other states have standards for hydrogen sulfide. There is no reason those states standards and studies could not be used to set reasonable standards in Iowa. By using the data collected in studies conducted at Iowa State University, the University of Iowa in addition to these other state's studies Iowa would not have to expend unnecessary funds to establish guidelines.

DNR is trying to do their job but Farm Bureau and industrialized agriculture are in this to make money without concern for health or environment. They are courting the elected officials by telling them Iowa has to have commercial feeding lots to survive but in fact they do not. The small family farmer has been and is being pushed out of business.

Many of the speakers at the DNR hearings for clean air speak in favor of lenient standards stating they were third and fourth generation farmers but concentrated animal feeding operations only go back a couple of generations - in 20 years it will be too late to fix the problems when now we could help to prevent the problems from occurring. The time to invoke standards for the future is now. Hydrogen sulfide poisons the brain and the poisoning is irreversible.

I feel DNR should pursue the strictest standards they can to protect the environment and peoples health. I live just north of a CAFO and am not happy when the wind comes this way. It gives me respiratory distress and I can not even be outside in my yard or on my property. I can't open my windows without the stench coming in and burning my nostrils and eyes. It can not be healthy. And when I see the dead pigs laying outside the hog confinements I wonder if they didn't die themselves from inhaling the fumes and hydrogen sulfide. I would fully expect that some day people buying the pork in stores will file a class action suite due to the poisons being ingested from the meat that has absorbed them. Now is the time to

stop those problems from manifesting.

Respectively Submitted,

Shirley McIntosh
1731 Warbler Avenue
Dumont, IA 50625

From: "Jan Klahs" <jfklahs@fbx.com>
To: <bryan.bunton@dnr.state.ia.us>
Date: 3/24/04 3:42PM
Subject: Air Quality

Mr. Bryan Bunton,

We support clean air and a thriving livestock industry in Iowa. We are opposed to the ever increasing size of the confinement operations. We need to learn from other disasters that have occurred in the southern US. Hold your ground on the 15 ppb hydrogen sulfide standard! Air quality monitoring needs to stay at 300 meters, not at separated locations. We rely on the DNR to keep the people and the environment in Iowa safe. We don't want things to be lax and then have to try and repair the damages in Iowa.

Thank you,
Jan and Frank Klahs

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MAR 24 2004

1

I found this address in the paper. CAT said to write if you think the DNR are going to fund to put so I thought this is my chance to write. I haven't met a decent DNR yet. They are stupid. I can't believe what they come up with. There are so many other in this town that feel the same way. Never been a good word about them. Or a good thing that they have done for someone.

Some examples, about 2 yrs ago I got a land owners permit to go deer hunting. I lived at home on my dad's farm at the time. I didn't even go deer hunting. A few weeks later a DNR guy called my dad and said I couldn't do that because I didn't own the

land and bla bla bla not for sure all what he said I wasn't there. My dad had a stroke 2 yrs before that. My dad told him I put in the crops and farm the farm. For the fences that the deer stretch. For the trees & suckel blades on the haybarn. Due to the deer antlers. Not saying all the corn they eat & beans they eat. And I couldn't shoot 1 deer with all the deer out there. But I didn't even go deer hunting. And if you shoot a turkey its a wood fire then getting caught with magazine. Horn stupid.

But before all of this happened my dad rented over

2

Other farm house out to a
"DNR person". She did what
ever she wanted to do. Threw
old chairs in a ditch on our
farm. Used my furniture
that I had stored in a room in
the house. I asked her before they
moved in if it would be OK left
in the room or I would take
it out. It was in a bedroom.
There were 3 other bedrooms. She
had no reason or right to
take it out and use it!!!
Just did what ever she wanted
to do. About 2 yrs. later they
moved. About 7 mths after they
moved they came back and
took a tree stand out of a
tree that was on our farm.
With out asking, don't the
trespassing? You would
think the DNR would know

all the rules. They just
always think they can
do what ever they want.
When ever they want.
No matter what. But
for us we always have
to go by the rules.
Well I have said
what I had to say.
I just have no use
for them. Thank you
for your time

February 25, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road
Urbandale, IA 50322

Dear Mr. Bunton:

This letter is in regards to the proposed 15 ppb hydrogen sulfide air levels. Were did the DNR come up with this level for monitoring are quality? It is my understanding that this number was thrown out last year. The reason it was thrown out was because it was not backed by any scientific study. Also this number is not consistent with the most conservative levels established by the U.S. Centers for disease control.

I currently work in the Pork Industry here in Iowa. My family and I feel very strongly that clean air is very important. I would support any laws that are backed by scientific research. I also on the other hand will be against any laws not backed by scientific research that could possibly destroy my livelihood. I understand that a lot of people are against livestock producers for whatever reason. I also know that there are a lot of other pollutants here in Iowa that never get addressed. It is not fair to single out one industry with ridiculous laws or rules that have no scientific research to back them.

Once again I would like you to reconsider your proposed levels. There must be a more scientific study done to determine if there is a problem first. This industry is very important to the State of Iowa. Lets not make decisions without proper studies done first.

Sincerely,



2321 130th St.
Belmond, IA 50421

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MAR 24 2004

February 29, 2004

Mr Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road
Urbandale, Iowa 50322

Dear Mr. Bunton:

I have some comments on the proposed standards for hydrogen sulfide . I think more more field study should be done before any rules are put in place. From what I have been able to find out 15 ppb for 8 hours a year have not been proven to constitute any health risks. All testing should be done at residences to know if there is any impact on these neighbors.

As a pork producer I am committed to clean air and a quality environment but any regulations need to be based on science and facts. Any new regulations should apply to everyone in the state not just one segment of it.

Sincerely,

Harry Sponenburg
1600 Des Moines St.
Webster City, Iowa 50595

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MAR 24 2004

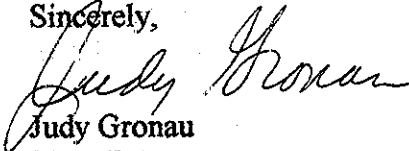
Bryan Bunton
IDNR
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, Iowa 50322

Dear Mr. Bunton:

I am a family farmer from Crawford County and writing to you about my concerns in the proposed hydrogen sulfide rules. The 15 ppb is just too restrictive and needs to be set more in line with levels established by the US Center for Disease Control. The DNR needs to use sound science when making rules as well as being consistent with Iowa laws in regard to the set back rules. The legislature last year indicated that the 15 ppb was not workable and now the DNR is trying to use the same numbers. You need to use sound science when attempting to set rules

Agriculture is a vital part of Iowa's economy and needs to continue to be a part of Iowa's future. One out of every four jobs in Iowa is connected to agriculture and we need those job opportunities. Our son as well as many other young people in Iowa want the opportunity to stay on the farm and continue the business we have taken so many years to establish. Please we ask that you be reasonable when you set rules that we have the opportunity to continue to farm and be an important part of Iowa's future. When given the opportunity farmers are the best stewards of the land and will do what is best for Iowa and the environment. Your rules from the DNR do not use common sense for Iowa and its future.

Sincerely,



Judy Gronau
3245 K Ave,
Vail, Iowa 51465

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MAR 24 2004
MAR 24 2004

Brad Hastings
11402 J Avenue
Iowa Falls, Iowa 50126

March 4, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road
Urbandale, IA 50322

Mr. Bunton:

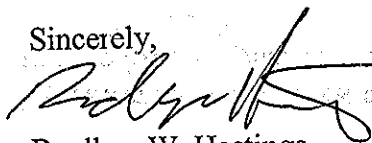
I have never provided public comment to the DNR, but I feel compelled to do so today. Your proposed air quality standard of 15 ppb for Hydrogen Sulfide is not consistent with the levels established by the U.S. Centers for Disease Control nor is it consistent with the recommendations in the report issued by the University of Iowa and Iowa State University committee.

I am aware that the IDNR established air quality standards last year for hydrogen sulfide and the Iowa Legislature nullified the rule. Now, you are proposing to use the exact hydrogen sulfide standard that the Legislature nullified. When the nullification happened they made it clear they wanted the standards based on good science and stay within the boundaries of Iowa law. However, the IDNR continues to monitor hydrogen sulfide at distances other than the neighbor's residence as clearly defined in the law.

The IDNR is also proposing a duration exposure level of only 8 hours per year without any scientific justification. My understanding is that conservative health screening standards allow for exposure levels at 30 ppb for up to 365 days per year without health risk. I do not understand how you can possibly create a standard for our industry without first conducting a thorough study to determine if there is a public health problem.

I am very frustrated with the proposed rules and the apparent attempt to over regulate the pork industry. There is nothing more important than the health and well being of our citizens. However, rules and regulations must be appropriate, fair and based on science. I believe your proposed levels by the IDNR do not meet those criteria.

Sincerely,



Bradley, W. Hastings

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MAR 24 2004

March 5, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

Dear Mr. Bunton:

I am writing in response to the DNR's proposed hydrogen sulfide rule for livestock production. The proposed air quality standard of 15 ppb for hydrogen sulfide is not based on science and is not consistent with even the most conservative levels established by the U.S. Centers for Disease Control.

Many peoples' livelihood depends on livestock production and it is also very important to the State of Iowa. I don't know how you can create a standard for our industry without first conducting a thorough study to determine if there is a public health risk.

The health and well being of myself, my family, and my neighbors is very important to me. However, new rules and regulations must be fair, appropriate, and they must be based on science. The levels proposed by the Iowa DNR fall far short of that criterion. Please conduct the monitoring study, determine if a problem exists and then base the standards on good science not pressure from activist groups.

Sincerely,

Valerie Maas

Valerie Maas
601 Popejoy Ave.
Alden, Iowa 50006

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MAR 24 2004

From: "Joan and Eldon Hoekstra" <ejh@nethtc.net>
To: <bryan.bunton@dnr.state.ia.us>
Date: 3/25/04 4:57PM
Subject: air quality

Bryan

I think it is time we stop letting those who know very little about our industry stop controlling us and our livelihood and future. I have had three sites with 3 to 4 thousand hogs for 12 years and have had no complaints. I think there are lots of things going on to improve things. Such as planting trees around buildings. Feed industry trying to stop odors with feed additives. We have 3 of us involved, myself and 2 boys why do we need to let a few ruin the whole industry?

Thanks
Eldon Shane and Lance Hoekstra

From: "Noel Thompson" <nthomps@netins.net>
To: <bryan.bunton@dnr.state.ia.us>
Date: 3/25/04 7:09PM
Subject: Air Quality Standards Letter

Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, Iowa 50322
FAX (515) 242-5094
bryan.bunton@dnr.state.ia.us

Re: Air Quality Rule for Hydrogen Sulfide

Dear Mr. Bunton:

I am writing in response to proposed rule for hydrogen sulfide. I am a farmer from Hamilton County. I have farmed for 24 years and wish to continue to make my living through agriculture. I believe the proposed air quality rule for Hydrogen Sulfide is too restrictive and I would like to see the DNR reconsider their proposal.

Specifically, I am disappointed that the DNR has proceeded to develop the rule that is the same as the nullified one from last year. The legislature said that the 15 ppb standard was too restrictive, why would you come back with the same number?

If we look at health standards from other national agencies (ASTDA, OSHA, NIOSH, AIHA, AGCIH, and NAS) for Hydrogen Sulfide, we see that their standards and levels established to protect public health range from 70 ppb to 20,000 ppb.

I believe our rules and regulations need to be based on sound science, not on emotional politics.

Sincerely,
Noel Thompson
3065 Ubben Ave
Ellsworth, Iowa 50075
nthomps@netins.net

From: "Sharon Lemkee" <lemkee@awcmail.com>
To: <bryan.bunton@dnr.state.ia.us>
Date: 3/26/04 4:41PM
Subject: proposed clean air rules

I encourage the DNR to keep writing strong rules to protect our air, water, and environment. There are many citizens who support stronger controls. If I can help in any way, please call on me.

Sharon Lemkee
1603 Irvington Road
LuVerne, Iowa 50560

To: Iowa Department of Natural Resources
Air quality Bureau
7900 Hickman Road Suite one.
Urbandale Iowa 50322

My name is Forrest Teig. I live on a farm adjacent to Sunnyside Park inside the city limits of Atlantic, Iowa. After annexation to the city, our address became 1604 Sunnyside Lane.

For over 40 years the livelihood of myself and family has been derived from the successful operation of this grain and livestock farm.

The urbanization of our population that is taking place in what was once rural Iowa, has brought about painful adjustments for many of our smaller towns and cities.

Cattle, hog, and poultry production has been a major industry for Iowa farmers since the time of our pioneer forefathers.

Now we are faced with the conflict of the ever expanding livestock confinement feeding operations and the residential growth at the edge of our towns.

The democracy in which we are so fortunate to live provides laws for the protection of the many from the sometimes selfish ambitions of the few.

After our farm was annexed into the city it became obvious that we could not continue to carry on with a practical livestock operation, and I have a self-imposed limit of one cow per acre of pasture on our

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MAR 26 2004

farm. That number will quite likely be down sized with the projected expansion of our residential neighborhoods.

The Iowa DNR has been presented with one of its biggest challenges right here within the city limits of Atlantic. They have designed and permitted a manure disposal system that will accommodate up to 4500 head of cattle. The system is in compliance with all existing water and air pollution laws.

The city of 8000 people with hopes of attracting business, industry and young families await the successful outcome of this experiment in a feedlot operation located largely inside the city limits.

Myself, my family and my neighbors have a large stake in the successful outcome of this operation.

Respectfully submitted,



Forrest Teig

P.S. Hopefully the Legislature will see fit to allow cities and counties to control the siting of large livestock confinement operations where air and water pollution renders nearby property unfit for human habitation.

Phone 712-243-3209

Forrest Teig
1604 sunnyside Lane
Atlantic, Ia. 50022

RECEIVED
MAR 26 2004

From: "Duane Jones" <dajones@lisco.net>
To: <Bryan.Bunton@dnr.state.ia.us>
Date: 3/27/04 8:23AM
Subject: clean air

Dear Mr Bunton,

My name is Duane Jones. I live near Attica, southeast of Knoxville, Iowa. I have signed a form letter that comes from IFBF concerning air quality now being discussed by Iowa legislators, but feel the need to be more personal in contacting you. I am 70 years old and was raised on a farm, continuing to farm until I retired. I am deeply concerned that all government agencies are straining to choke every business into submission with a bunch of rules and regulations that are perpetrated by a group of environmental know-it-all's.

I watched, some 25 years ago, the demise of the coal industry in southern Iowa. This industry supplied much of the fuel for electrical energy in our state while also providing many with a job (many of them were farmers trying to make enough money in the winter to farm in the summer). This happened by the knee-jerk reaction to global warming causing a need to "correct" emissions caused by high sulfur coal. The rules that emitted from all this came from the feds in general, but it did not take long for all the states to jump onboard. THERE ARE NO COAL MINES IN IOWA NOW.

All of the do-gooders that are for the tight (and unreasonable) rules the state is imposing and proposing, are the ones that claim they want to save the "family farms".

How in the hell do you think a farmer with limited resources as a "family farmer" will be able to abide economically with the rules that are about to be shoved down our throats. I have a dozen near by really small hog farmers feeding out 500 or so, who have quit and destroyed their facilities. These are the "family farmers" that everybody wants to protect.

Incidentally one of them was about 2500 feet from me and in the twenty eight years I have lived here, I probably had to roll my windows shut 4 times to close out the smell. I NEVER WHINED TO PEOPLE LIKE YOU ABOUT THAT. I know I live in farm country and have to bear some "unpleasant" situations. I would not have wanted that farmer to quit raising hogs because he offended me a very few times.

One question, do you really think it is necessary to eliminate the farmers and food production with over-regulation?

Thanks,

Duane Jones
Attica, Ia

March 27, 2004

Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, Iowa 50322
Fax: 515/242-5094

Re: Air Quality Rule for Hydrogen Sulfide

Dear Mr. Bunton:

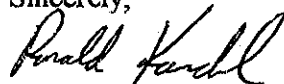
I am writing in response to the proposed rule for hydrogen sulfide. I am a farmer from Scott County. I have farmed for 30 years and wish to continue to make my living through agriculture. I believe the proposed air quality rule for hydrogen sulfide is too restrictive and I would like to see the DNR reconsider their proposal.

Specifically, I am disappointed that the DNR has proceeded to develop the rule that is the same as the nullified one from last year. The legislature said that the 15 ppb standard was too restrictive. Why would you come back with the same number?

If we look at health standards from other national agencies (ASIDA, OSHA, NIOSH, AIHA, AGCIH, and NAS) for hydrogen sulfide, we see that their standards and levels established to protect public health range from 70 ppb to 20,000 ppb

I believe our rules and regulations need to be based on sound science, not on emotional politics.

Sincerely,



Ronald Kardel
22456 90th Ave.
Walcott, Iowa 52773

From: "Ann Wilson" <mwilson@n-connect.net>
To: <bryan.bunton@dnr.state.ia.us>
Date: 3/28/04 10:31PM
Subject: Air Quality Standards

Mr. Bunton,

I am not usually one to speak out but feel it very necessary at this time. My family has farmed for over 100 years and we have followed all the regulations that come our way.

I guess the old saying is true that "the squeaky wheels get the oil". For far too long the farmer has sat back and let a few radical people spread half truths. It is time we stand up and speak out to be heard.

We care about clean air and a quality environment. Our families live and work on the land every day and want to pass it on to our next generation so it is in our best interest to protect the ones we love and the land we serve.

I'm concerned that the 15 ppb standard for hydrogen sulfide is not supported by sound science. I raise 3 small children on a hog/cattle farmstead. I am also a Medical Technologist, ASCP certified. The CDC has set levels of 70 ppb for 1-14 days of continuous exposure and 30 ppb for 15-364 days of continuous exposure. The proposed 15 ppb sends a false message to Iowans that this is the necessary level to protect public health.

There is already separation distance requirements in place so why wouldn't the monitors be placed at the same distance? The air monitors should not be closer to the livestock operation than the residence.

Please review the facts closely and remember that the farmers care more about the air and environment than most people and have a vested interest in protecting it.

Sincerely,

Ann M. Wilson
2319 Omega Rd
Delhi, IA 52223
mwilson@n-connect.net

CC: <gene.tinker@dnr.state.ia.us>

From: "Frank Hemmelrick" <frannh@evertek.net>
To: <bryan.bunton@dnr.state.ia.us>
Date: 3/29/04 7:43AM
Subject: clean air for Iowa

It seems as though the clean air that Gov. Vilsack wants, the House and Senate don't. Aren't these individuals voted in to work for the citizens of Iowa? Who runs Iowa? Big Business or it's citizens? Better yet, who owns the House and the Senate. How many of them have ownership in a "few" factory farms? How many of them live next to a hog confinement? Perhaps they need to try it???

Frank and Ann Hemmelrick
1320 190th St
Bradgate, IA 50520



Bryan Brunton
7900 Hickson Rd Suite

DOUG BECKMAN
55375 26TH ST.
GLENWOOD, IA

①

testimony for DNR

Hydrogen sulfide standard

→ name of state

BASED ON SOUND SCIENCE

SOURCE: OXFORD AMERICAN DICTIONARY

SCIENCE: A BRANCH OF KNOWLEDGE REQUIRING
A SYSTEMATIC STUDY AND METHOD. ESPECIALLY
ONE OF THOSE DEALING WITH SUBSTANCES, ANIMALS
AND VEGETABLE LIFE AND NATURAL LAWS.

SCIENTIFIC: USING CAREFUL AND SYSTEMATIC STUDY,
OBSERVATIONS AND TEST OF CONCLUSIONS

METHOD: A PROCEDURE OR WAY OF DOING SOMETHING

SCIENTIFIC METHOD: PROCESS BY WHICH SCIENTISTS
ENDEAVOR TO CONSTRUCT AN ACCURATE,
RELIABLE, CONSISTENT AND NON-ARBITRARY
REPRESENTATION OF THE WORLD.

THE SCIENTIFIC METHOD HAS FOUR STEPS:

1. MAKE AN OBSERVATION - hydrogen sulfide
is a problem.

{ PUBLIC PERCEPTION }

2. FORM A HYPOTHESIS: In this case, Hydrogen
sulfide at 15 PPB from livestock
confinement is a health hazard to people.
A HYPOTHESIS IS AN UNTESTED OBSERVATION.
It may be correct or may be wrong.

3. DESIGN METHOD TO PROVE HYPOTHESIS:
~~to~~ collecting data must be consistent
and unbiased.

(2)

H. ~~ANALYZE~~ ANALYSIS INFORMATION AND COME TO A CONCLUSION.

- can not be done before multiple tests are done
- conclusion must be based on all information collected.

COMMON ERRORS ARE FAULTY TESTING AND IGNORING DATA THAT DOES NOT SUPPORT THE HYPOTHESIS.

- The scientific method attempts to minimize the personal or cultural beliefs we hold that may influence the outcome of our research.
- a famous scientist once said "Smart people can come up with very good explanations for mistaken points of view"
- The state legislature defined a method of testing and a time period to collect information.
- The proposed 15 PPB rule is flawed because:

(TOO MANY VARIABLE) 1. Data collected so far is coming from inconsistent measurement sources.
2. The standard is set before all data is collected and analyzed.

(3)

- REGULATION IS WARRANTED WHEN THERE IS A PROVEN BASES.
- In words, does this proposed standard have a cultural bias?
 - Is it against livestock producers?
 - Is it against corporate livestock producer?
- If the purpose is to save the family farm the end result will be the opposite. They will be the first to give up or be at a competitive disadvantage.
- If the purpose is to get rid of livestock in Iowa it will have a devastating effect on the state economy.
 - If you think our state finances are in trouble now, it will be in a shambles without the livestock industry.
- If producers of livestock leave Iowa, where will our meat at the grocery be produced?
- Many think it will be South America.
- Will our food be as safe and high quality as it is now?

LETS MAKE RATIONAL DECISIONS BEFORE IRRREPERAL DAMAGE IS DONE TO THE LIVESTOCK INDUSTRY.

Russell Miller
15166 Pinecrest Drive
Council Bluffs, IA 51503

March 25, 2004

Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

Dear Bryan Bunton:

I am writing this letter to oppose the proposed rule for hydrogen sulfide. I do not understand why the Department of Natural Resources is forgoing all documented policy they, along with a body of reputable scientists, developed. This body surely would not have created an index, which allows hydrogen sulfide levels at over four times the level the DNR is now proposing? As a father of small children, I want my children, as well as the public, to be safe and protected from all hazards. However, at this point, there has not been enough research completed to determine what level of hydrogen sulfide is a health concern. I do believe it is imperative that there be more testing. Then, a standard for hydrogen sulfide levels should be set.

I am a fourth generation farmer who has been farming for fourteen years. I see this move by the DNR as unfounded and anti-farm. It looks in my mind as if there has been undue influence by other social groups. The numbers of farmer are dwindling every year and this step will invariably assist the decrease. I am just trying to provide for my family by producing food for the nation's table. Please, do not show favoritism, but rather act on behalf on the total population.

Sincerely,



Russell Miller

RECEIVED

MAR 29 2004

From: "Kathy Frank" <FRANKKM@mercyhealth.com>
To: <bryan.bunton@dnr.state.ia.us>
Date: 3/31/04 11:02AM
Subject: Hi Bryan

Hi Bryan

I might be out of town when there is a meeting regarding hydrogen sulfide health standards at Muse Norris. I'm going to try to be there, but if I am not you can always put my mark on the side of clean air to breathe. We are still sucking plenty of cement dust in Mason City so I feel it is important to continue to WANT CLEAN AIR. I guess the last few weeks we have been drinking dirty water too. The beat goes on, huh? Kathy Frank

PS

I appreciate all you and Pete Hamlin did to help me regarding clean air in the past.

Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, Iowa 50322
FAX (515) 242-5094
bryan.bunton@dnr.state.ia.us

Re: Air Quality Rule for Hydrogen Sulfide

Dear Mr. Bunton:

I am writing in response to proposed rule for hydrogen sulfide. I am a farmer from Henry County. I have farmed for 20 years and wish to continue to make my living through agriculture. I believe the proposed air quality rule for Hydrogen Sulfide is too restrictive and I would like to see the DNR reconsider their proposal.

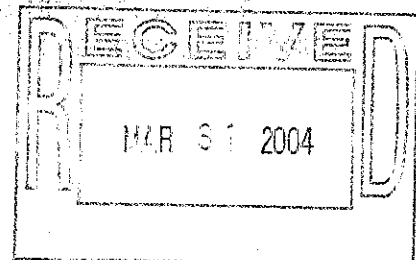
Specifically, I am disappointed that the DNR has proceeded to develop the rule that is the same as the nullified one from last year. The legislature said that the 15 ppb standard was too restrictive, why would you come back with the same number?

If we look at health standards from other national agencies (ASTDA, OSHA, NIOSH, AIHA, AGCIH, and NAS) for Hydrogen Sulfide, we see that their standards and levels established to protect public health range from 70 ppb to 20,000 ppb.

I believe our rules and regulations need to be based on sound science, not on emotional politics.

Sincerely,

Lowell Unruh
1114 Franklin Ave
Wayland, IA
lunruh@farmtel.net



I appreciate the opportunity to comment on this issue that is so important to the health and future of this state.

Nationwide, especially in Iowa, if we want to grow our communities and retain people, especially our young, we need to prioritize some things

Who, rather it's responsible industry, hard working people, or our children, would want to remain or locate in a state where the government doesn't strive to protect the health of it's people and work force? Why not a reputation of a good Quality of life in this state? Shouldn't we start with health first? For the good of Human health and welfare, we need to monitor Hydrogen sulfide and ammonia from Concentrated Animal Feeding operations. This is for health, the risk is very apparent ... so isn't it better to let the process work, and monitor ... than do nothing?! Can anyone predict the consequences of doing-nothing? This is a golden opportunity for every bureaucrat to step up to the plate to put the health of people first! We need economic development in this state ... but we need to prioritize some things!

These Air Quality standards should be based on the recommendations of 27 scientists from U of I and ISU that are experts in public health and animal agriculture – with peer review nationally and internationally. I support the DNR'S hydrogen sulfide standard at 15 parts per billion @ the one hour average recommended by the joint ISU / U of I study

The rules reflect sound science, and with monitoring we will accumulated more information for sound science in the future. Isn't that what we all want? Also, the earliest enforcement of the rules for emissions does not take place until 2007. Wouldn't monitoring help the industry adjust to responsible agriculture? 28 states have standards for Hydrogen sulfide and 11 for Ammonia. ... Why shouldn't Iowa?

This is a very important first step to address the serious health problems associated with large concentrated livestock operations! Especially for the rural residents living near these operations!

Monitoring of Hydrogen sulfide and Ammonia should begin immediately to formulate the intent to protect the health of Iowans. I would hope the DNR, the legislators, and all others concerned feel it is not unreasonable to monitor!

As a small independent pork producer myself, I encourage good decisions on your (DNR) part to protect the health of all people affected by livestock production, including the workers within the industry! We need to put people's health ahead of profits!

We all invested a lot of time the last few years legislatively developing livestock legislation ... let's hope all our work was not in vain ... especially for health!

As an ending thought I would like to quote Jeff Vonk of the DNR last year on this whole process. "This law is not to fine people, but to protect people's health!"... I say... it's only monitoring - so, "Let's do it!"

Chris C Petersen
7645 180th st
Clear Lake IA 50428
1-641-357-4090

March 30, 2004

Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, Iowa 50322
FAX (515) 242-5094
bryan.bunton@dnr.state.ia.us

Re: Air Quality Rule for Hydrogen Sulfide

Dear Mr. Bunton:

I am writing in response to proposed rule for hydrogen sulfide. I am a member of a family farm in Clay County. We have farmed for 40 years and wish to continue to make my living through agriculture. I believe the proposed air quality rule for Hydrogen Sulfide is too restrictive and I would like to see the DNR reconsider their proposal.

Specifically, I am disappointed that the DNR has proceeded to develop the rule that is the same as the nullified one from last year. The legislature said that the 15 ppb standard was too restrictive. Why would you come back with the same number?

If we look at health standards from other national agencies (ASTDA, OSHA, NIOSH, AIHA, AGCIH, and NAS) for Hydrogen Sulfide, we see that their standards and levels established to protect public health range from 70 ppb to 20,000 ppb.

I believe our rules and regulations need to be based on sound science, not on emotional politics.

Sincerely,



Jeannette Raglen
M&C Anderson Pullets, Inc.
4725 225th Ave.
Sioux Rapids, IA 50585
(712) 283-2214 (phone)
(712) 283-2257 (fax)
jraglen@fbx.com (e-mail)

RECEIVED

APR 02 2004

dkruger

From: "dkruger" <dkruger@ncn.net>
To: <bryan.bunton@dnr.state.ia.us>
Sent: Friday, April 02, 2004 1:50 PM
Subject: Air Quality

Dear Mr. Bunton:

Last evening my husband and I, and our ISU freshman son were present at the Air Quality hearing in Mason City. We are against the 15ppb standard as it is not supported by sound science. We know you have heard the facts from the hog producers present. Thank you for that opportunity.

Our story is similar. Our hog and grain operation supports our family. We are co-owners of a sow co-op and finish 4500 hogs a year. Our two 1000 head finishers set only 300 feet from our home. We have 4 children, ages 21, 19, 15, and 13. We are in excellent health and they participate in school sports. Our two sons want to return to the farm. Our two daughters also have enjoyed living on the farm, from entertaining their friends on the farm to showing beef cattle and hogs at the 4-H fair. Our 21 yr. old daughter was 2002 Iowa Pork Queen. We felt it an honor to have her represent and be a spokesperson for a vital and needed industry in Iowa.

Knowing the facts gives little room for fear. Our son has just completed his research paper for his college English class on Fair Legislation- Air Quality. We encouraged him to attend this hearing to learn more. It was encouraging to hear farmers take the stand and be positive about agriculture. This is needed even in Iowa, where you would think that the public would understand its importance to Iowa economy.

Farmers do care about clean air- We inject our manure. My husband is certified to haul manure, another regulation and we have up to date MMR plans. The neighbors have no complaints about the odor.

The 15 ppb is not supported by sound science. It is not consistent with the US centers for Disease Control. Establishing 15 ppb sends a false message to Iowans that this is the necessary level to protect public health.

Monitoring should be done at separated locations. They should not be closer than the required separated distance.

Dennis and Debra Kruger
245 250th St.
Wesley, Iowa 50483
dkruger@ncn.net

4/2/2004

From: "Steve Reedy" <reedy@dtnspeed.net>
To: <bryan.bunton@dnr.state.ia.us>
Date: 4/3/04 4:07PM
Subject: Hydrogen Sulfide HEV Input

Dear Bryan,

It is my opinion that the Hydrogen Sulfide Trigger Threshold Value should be raised to 30 ppb.

I further believe that site monitoring should be done outside the homes of the neighbors registering the complaints. Because that is where the point of long term contact actually exists and adverse health effects may allegedly occur.

I was raised on a livestock farm and am allergic to hog and grain dust. When I was in the barns I was affected, but not otherwise. The smell of wet manure spread on the neighbors field may have been unpleasant, but it certainly did not cause any health problems.

Thank you for your consideration.

Sincerely, Steve Reedy, Hardy Ia

April 7, 2004

Bryan Bunton
515-242-5094

Dear Mr. Bunton

I am opposed to the proposal DNR Air Quality Rule. I am a grain farmer and livestock farmer in southeast Iowa. I have been following the debate from the public hearings and it is clear to me that the vast majority of farmers are also opposed.

It is difficult to get farmers to show up at public events like this but they have been showing up in droves to oppose it.

Farmers support rules and regulations that are based on the best scientific research available. House File 2523 uses the most recent data available from the ATSDR, a division of the U.S. Centers for Disease Control. The Centers for Disease Control are experts in the area of public health.

We want rules and regulations for all aspects of agriculture to be based on sound science. Your proposal fails the test. At every hearing you have heard from farmers from all over the state that are opposed to your rules. The few that support you are from small vocal groups that send the same people to various hearings. They do not represent rural Iowa.

Sincerely



Dick Rickelman
30009 Umber Avenue
Pulaski, IA 52584
641-675-3474
Fax: 641-675-3574

From: "JEANETTE BAUER" <jeanettepb@msn.com>
To: <bryan.bunton@dnr.state.ia.us>
Date: 4/4/04 2:50PM
Subject: clean air

I support clean air. Please support a bill that actually will limit fouling the air and not one that is a farce and lets our air be fouled by hog lots. We need a bill that has real rules, not one that lets things go pretty much the same as the past which has caused the problem. We need solve the problem of clean air-not let the air continues to be fouled. Jeanette Bauer

From: "m mcdowell" <mamcd@rconnect.com>
To: <bryan.bunton@dnr.state.ia.us>
Date: 4/4/04 9:00PM
Subject: Support of 15ppb hydrogen sulfide standard

Dear Sirs,

My name is Mark McDowell I am a hog farmer and the Hardin Regional Chapter president of Iowa Citizens for Community Improvement I am in complete support of the 15 ppb hydrogen sulfide standard recommended by DNR

I believe the joint University of Iowa and Iowa State University is the best science available for the protection of public health in Iowa. This is the objective Governor Villsack had in the first place when he called for the study

I believe the allowance of seven exceedances per year of the standard is too lenient and should be eliminated. What good this allowance do for people forced to live near a cafo against their will?

I don't believe the hydrogen sulfide standard of 15 ppb will drive the hog industry as opponents such as the Farm Bureau have stated. I also think that standards for ammonia and odor should be adopted

From: <Romslofloy@aol.com>
To: <bryan.bunton@dnr.state.ia.us>
Date: 4/5/04 12:09PM
Subject: Support for Air Quality Standards

Thank you very much for your work on behalf of Iowans & our health & well-being & for your efforts to help Iowa to become a more livable state. My husband & I support your hydrogen sulfide standard of 15 ppb & also any ruling on ammonia limitations. I have written to my legislators, to Governor Vilsack, to the Des Moines Register & have attended & also spoke at your Mason City hearing (4/1/04). Please know that you have our active & concerned support. Iowans need to take back Iowa.
Thank you.

Nancy Romslo Royal, Iowa

From: "Sheila Steffen" <tjna1993@sbtek.net>
To: <bryan.bunton@dnr.state.ia.us>
Date: 4/5/04 7:48PM
Subject: HF 2523

Dear Mr. Bunton:

We support the DNR's proposed hydrogen sulfide standard of 15 parts per billion, one-hour average, that was recommended in the joint University study. This is a good standard that, once enforced, will help protect our health. The DNR must issue a rule based on this standard!

The DNR also must include an ammonia and odor standard as recommended in the joint University air quality study. Iowans need a limit on the amount of ammonia and odors that come out of factory farms!

The DNR must support the joint University air quality study released in February 2002 that states hydrogen sulfide and ammonia have been measured near factory farms in concentrations that could be harmful to humans. This joint study is based on the best science available, compiled by 27 state university professors, and peer-reviewed by eight international and national experts. We have sound science, now we must use it.

Numerous scientific studies document the health effects associated with factory farm air pollution. For the public health of rural Iowans, factory farms must be required to lower the amount of their emissions.

Sincerely,

John and Sheila Steffen

April 5, 2004

Mr Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

Dear Mr. Bunton:

This letter is sent in response to the request for public comment by the Iowa Department of Natural Resources (IDNR) as to the proposed administrative rules as set forth in item ARC 3092B in the Iowa Administrative Bulletin dated January 7, 2004

I am a representative of the Sparboe Companies, Inc a Litchfield, MN based family farm corporation involved in egg production, processing and marketing. Sparboe Companies, Inc. operates egg production and processing facilities in several Iowa counties. We have 15 individual Iowa family farmers and one Iowa cooperative producing shell eggs for us under production contract agreements. The impacts of any air quality regulations will fall, not only on Sparboe Companies, Inc. operations, but also on the family farmers and the cooperative that we contract with simply due to the size of their egg production operations.

I have reviewed the science theoretically behind the current proposed rule and have concluded that the proposed rule does not meet the test of sound science. This raises the question as to whether the IDNR is more interested in designing air quality standards for regulatory purposes that challenge CAFO operations and threaten to put them either directly out of business or do so by making the standards economically impossible to attain

The IDNR efforts to date, including this proposed rule, are not "public health concern or public health protection" regulations. The department has established a history of ignoring the requirements placed into Iowa law by Senate File 2293, the so-called "livestock bill". This legislation directed the department to conduct a *study*. If baseline data indicated to a reasonable degree of scientific certainty that airborne pollutants emitted by an animal feeding operation were present at a separated location at levels commonly known to cause a material and verifiable adverse health effect, **then** IDNR *could* develop plans and programs for the abatement, control and prevention of airborne pollutants originating from animal feeding operations. The measurements were to be taken at separated locations.

Instead of following the law, IDNR began putting monitors at places other than separated locations and proposed an ambient air quality standard enforceable December 1, 2004. The result was a legislative veto of the department's actions. This means time and taxpayer dollars have been misappropriated by the department through their apparent desire to ignore the law.

In addition, the department's proposed numbers for hydrogen sulfide appear to remain based on the results of the so-called "University Report". This report incorrectly assumed the presence of hydrogen sulfide and ammonia at equal concentrations at the same times and their presence at all times. It is my understanding that the data collected to date disproves both of these assumptions.

There is no question as to the importance of animal agriculture to Iowa's economy. Even the governor agrees with that. There is also no disagreement as to the importance of a good, clean environment for all of us Iowans. The two are not mutually exclusive.

Animal agriculture has thrived for decades in Iowa, albeit in a much different structural form. It strikes many of us in animal agriculture that the battle brewing in Iowa is not necessarily about environmental concerns, like air quality, as much as it is about the changing structure of the farm community. Unfortunately, it certainly appears through the present rule proposal and other actions that the IDNR has chosen to take the side of those that do not like the changes occurring in animal agriculture and farming in general. IF that is indeed the situation, it is truly a sad day for all Iowans!

We support the air quality legislation pending in the 2004 Iowa Legislature as it is factually a "public health" standard and believe that, if the IDNR is actually for valid air quality regulation that they will put their support behind this legislation. Everybody wins with that legislation.

We also suggest that the IDNR consider reactivating the former Animal Agriculture Consulting Organization (AACO) to allow the animal agriculture industries to work along side with the IDNR to deal with environmental matters as they become known. Those of us in animal agriculture are all for a good, clean Iowa environment. We live in it. Our children live in it. Our grandchildren live in it. I take strong exception to anyone who implies that we in animal agriculture do not care about the environment we spend our lives in on a daily basis. Many of us have spent our entire lives here and do not plan to leave.

It seems logical for the IDNR and the regulated animal agriculture community to work together in devising regulations that will adequately protect the environment for all Iowans while at the same time allowing animal agriculture to reasonably coexist and thrive in Iowa. We would ask the IDNR to consider working with us to find common ground in environmental protection.

Thank you for the opportunity to comment

Mark D. Friedow
Sparboe Companies, Inc.
1213 Rushridge Road
P.O. Box 110
Jefferson, IA 50129-0110
Phone: (515) 386-8580

Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, Iowa 50322

Re: Air Quality Rule for Hydrogen Sulfide

Dear Mr. Bunton:

I am writing to you in regards to setting standards for hydrogen sulfide at 15 PPb which I think is low and restrictive. I am a livestock farmer from Guthrie County and have farmed continuously for over 50 years and plan to continue in the agriculture field.

Am I hearing right, that the standards you want to adopt are the same ones that were nullified last year. I think you need to stop and listen to what the majority speaking at the hearings that have been held are saying and the research submitted so far, 70 PPb would be more realistic and fair.

I believe in clean air, water and environment and it can be achieved if we work together and are reasonable. In short, I say NO to 15 PPb and YES to a figure higher such as 70 PPb.

Sincerely,
Dean Whitehead
2331 Yellow Ave.

RECEIVED

APR 05 2004

From: "Tim, Theresa Hake" <tnthake@rconnect.com>
To: <bryan.bunton@dnr.state.ia.us>
Date: 4/6/04 6:47PM
Subject: air pollution standards for factory farms

Dear Mr. Bunton,

We are writing in support of DNR clean air standards for factory farms. My husband and I own 49.5 acres in Chickasaw County, where we live with our 4 children. We live in a relatively "unspoiled" location from an agricultural point of view, with most of our property being in woods and pasture which we are planting trees. The closest hog confinement is 3 mi. away. Even at that distance, we can smell it in our yard when they do a cleanout at that place. We would hate to think of the health and quality of life consequences for those who live neighbors to factory farms such as that. The odor is terrible even at a distance, or when driving by. We cannot imagine what other rural residents must go through if they are unfortunate enough to live right next door to that odor, fumes, threat of contaminated water, and flies! We have thought how we would feel if something like that was moved in across the road from our place!

And often these places do not have any dwelling or owner living with these animal buildings-- they live far away from this health and environmental hazard and certainly would not want to live with that situation themselves, but rural residents who are neighbors are just stuck with the intolerable odor and health risk.

Thanks for listening to our comments.

Sincerely,

Theresa and Tim Hake
2040 Asherton Ave.
Ionia, Iowa 50645

515-242-5094

Jamie Schmidt**To:** bryan.bunton@dnr.state.ia.us**Subject:** air quality rules

I was in attendance at the hearing in Mason City on March 3rd and signed up to speak, but the meeting was ended before I was given a chance to relay my information. I had other commitments on the April 1st date. Here is what this process is doing to our farming operation. I am a fourth generation farmer on this land; the fifth generation is starting to come back from college and would also like to try to earn a living from the farm. There has always been livestock involved with this operation; more importantly there has been hogs and cattle on this place continually for over 100 years. We have always managed the nutrients from the hogs and cattle in a way that maximizes the value from it in order to gain the most economic gain for the operation, long before we had to use valuable time and fill out mmps. The next set of rules being proposed for air quality standards is having a large impact on our ability to plan for the future. We presently have an off-site nursery and finishers that are relatively new. Our sow breeding and gestation building is also only a few years old, but our farrowing buildings range from 26 to 47 years old and need to be replaced NOW. With these new rules no one knows what will or will not be in compliance. Furthermore, if some other site in the state would not meet the requirements we may be subject to further regulation, even if we are not the ones out of compliance. All of this makes it very hard for us to plan for the future. Do we stop farrowing, telling the young people coming out of college that the State of Iowa makes it impossible to be able to plan, so we can not update facilities and that they should go to some other state and use their skills and raise their family away from ours? Should we tell our full time employees that earn \$35,000 to \$40,000 a year that we can no longer employ them? Should we tell our banker that all the investments that have been made over the past years are now going to set empty and not earn a return because we cannot risk putting more money into the livestock operation for fear that a rule may be made—not on the facts that are out there but on emotion—which we can not plan for. I have lived on this farm my whole life other than when I was at college. I care deeply for the land and my neighbors. My family lives here; my wife and daughters come out to the hog buildings and help whenever I need. I would not expose them or anyone else to a bad environment. I ask you to use standards that are based on research and accepted by the CDC and give us a fair chance of knowing what the rules will mean to us, our operation, and our neighborhood. Thank you.

Jamie and Beth Schmidt
1572 Navy Avenue Gamer, Iowa 50438

4/1/2004

It is a very good idea for the DNR to set air quality standards. Hydrogen sulfide standards should be set at 15 ppb as recommended in the joint university air quality study.

I don't know about all the Farm Bureau's propaganda saying this isn't sound science. I don't know why some of the ISU professor's are no longer standing behind their study. But I do know a couple of things: My son has asthma-like symptoms at different times and there are 2 things that irritate him more than anything and they are cigarette smoke and going into the farrowing house of some friends of ours. It isn't even a confinement--it's just a small operation--about 10 sows. But he coughs and wheezes for a couple days after a visit. He loves the baby pigs but he pays for it with his breathing afterwards. The other thing I know is that my Dad has butchered in a local locker for years. He says he can tell me the minute he cuts into a hog how it was raised. As soon as he sees the lungs it's obvious. The lungs of a confinement raised hog are black. A hog that is raised in the fresh air has pink healthy lungs. These two things alone tell me that air emissions from hogs are a health problem. A lot of farmers say there is no problem. If that is so, then why are they so afraid to have a few standards set. They aren't regulations yet. Just standards so monitoring can be done and the results have some meaning.

Thank you for your consideration.

Dana Dettmer, 511 N Hartwell Ave, New Hampton, IA 50659

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From: "Louie Fallesen" <gunsSmoke@evertex.net>
To: <bryan.bunton@dnr.state.ia.us>
Date: 4/7/04 9:10AM
Subject: air quality regulations

Bryan, I support the proposed standard of 15 parts per billion for hydrogen sulfide, we also need regulations on ammonia and odor based on the joint university study. I had a 4050 head hog factory build about one half mile from my residence last fall. It stunk through the winter, but let me tell you just this morning it is terrible, heavy air and calm wind, you can feel it in your nose and eyes. I have a repair shop here, I can see the worst is to come with warm weather and humidity. I built my home here in 1975, 29 years ago. I did not move in next to the hog factory. Please work hard for rural Iowans who live next to factory farms, pass strong air quality regulations.

thanks, Louie Fallesen
Gilmore City, IA.

From: "Chantal Papousek" <papousek@mchsi.com>
To: <bryan.bunton@dnr.state.ia.us>
Date: 4/7/04 9:30PM
Subject: Bill

I support your proposed standard of 15 parts per billion for hydrogen sulfide but continue to call for an ammonia and odor standard based on the recommendations in the joint University study.
Can you do anything about the stink of AVEKA in Fredericksburg...
please?!?!?!?!

POOP STINKS<
Chantal Paposuek

Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, Iowa 50322

Re: Air Quality Standard for Hydrogen Sulfide

Bryan,

I would like to provide public comment on the proposed air quality standard for hydrogen sulfide

I believe that science based standards should be consistent across the country. Therefore, I feel that any standards established in Iowa should be consistent with national standards such as those established by the national Center for Disease Control for hydrogen sulfide.

I understand that the Iowa DNR has been directed by the Iowa legislature to monitor and test but I believe this testing was directed to be done at the residence and not in front of a grove separating the site and residence and not at the site. Correct testing as mandated by the legislature in conjunction with federal government data provided by the Agency for Toxic Substances and Disease Registry would be a step in the direction of using "sound science "

I am a firm believer that the DNR will be looking out for the interests of all lowans and will want to present a fair representation of this issue to the people of Iowa

I appreciate your time and consideration on this issue and I thank you in advance for your time.

Sincerely,

Kenneth F. Hemesath
Lynch Livestock, Inc.
Waucoma, Iowa 52171

[Persistent heartburn? Check out Digestive Health & Wellness for information and advice.](#)

From: "Tim Mckiernan" <tmckiernan@pocahontascoia.us>
To: <bryan.bunton@dnr.state.ia.us>
Date: 4/8/04 9:30AM
Subject: air quality rules

Dear Mr. Bunton, I am writing to voice my opinion concerning the air quality standards that your agency is considering. I believe that there is a large body of evidence that supports lower emission standards. For years we have heard the livestock industry talk of "sound science". Well now we have just that. Both of our major universities (University of Iowa and Iowa State University) agree that 15 PPB is a level of hydrogen sulfide that should not be exceeded by CAFO's. I am very much in favor of adopting this standard as well as a similar low level of ammonia when that standard is set. There is no reason to allow the livestock industry a free pass in the air quality area when every other industry in the state must meet strict air quality regulations. Iowa needs to begin to take air quality seriously and this is the best step we should take. Thank you for your consideration and hard work in this important matter. Don McLain, Pocahontas, Iowa

From: "Aaron Lorch" <lorchkid1@earthlink.net>
To: <bryan.bunton@dnr.state.ia.us>
Date: 4/8/04 2:32PM
Subject: hydrogen sulfide gas standards

2151 White Ave.
Ocheyedan, IA 51354
April 7, 2004

Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Huckman Rd. 50322

Dear Mr. Bunton,

As the Iowa DNR moves forward in proposing a health standard for hydrogen sulfide gas in the air in rural Iowa, we need to be careful not to overly burden our livestock industry. Iowa has always had a lot of livestock on its farms. Economic forces have driven the industry to less livestock farms with more animals on each farm.

These livestock farms feed roughly 80% of the corn that our fields grow. Soybean meal processed from the soybeans we raise is also fed to the animals we raise locally. Several of our small and medium sized farmers rely on livestock contracting for family income. The manure provides fertilizers for their crops.

The livestock farms drive the feed mills of this state and the people that work there. New businesses such as pressure washing and manure applicators have sprung up. Old businesses such as veterinarians, electricians, plumbers, service stations, and tire salesmen are all helped by the livestock industry. Also cement plants, lumber yards, carpenters, and the list goes on. Our county governments assess taxes on livestock facilities to help pay each county's expenses.

We do know of some large operations being built too close to residents, churches, schools, and other public facilities. However, these are in the minority. The greatest share of our livestock farmers are responsible, hard-working people, who keep the economy rolling in Iowa.

Sincerely,
Bruce A. Lorch

From: "Marian Kuper" <mkuper@mycns.net>
To: "Bryan Bunton" <Bryan.Bunton@dnr.state.ia.us>
Date: 4/8/04 4:58PM
Subject: H2S comment

Dear Bryan,

I am already on record as a supporter of the DNR's proposed hydrogen sulfide standard (15 ppb, one hour average, based on the joint ISU/UI study) via my spoken comments at the Mason City public hearing on April 1, 2004, but I also wanted to provide you with additional reasons for my support. While I applaud the DNR's generosity in holding the hearings in the first place (something that I understand was never required of the Department), it was evident at that hearing that many of the attendees felt constrained by the 3-minute-per-speaker time allotment. This is an issue of great importance to Iowans across the state, so I hope you will hear me out.

I attended "Environmental Health Impacts of CAFOs: Anticipating Hazards--Searching for Solutions" sponsored by the University of Iowa Environmental Health Sciences Research Center on March 29, 2004. The EHSRC is one of 21 university-based Environmental Health Core Centers funded by the National Institute of Environmental Health Sciences (NIEHS), an institute within the National Institutes of Health. It is also the only NIEHS-supported center in the rural Midwest and the only center to focus on rural environmental exposures and related injury and diseases. This conference offered the opportunity to listen to some of the world's top scientists on topics of great personal interest to me. Farming and animal husbandry were essential to my mother's family for generations, and remain essential to my husband's extended family and our nuclear family in north central Iowa. We, as well as many people we know, have personal experience with some of the disruptions brought about by consolidation in the swine industry and the related concentration trends that have affected rural Hardin County over the last dozen years. We joined Iowa Citizens for Community Improvement in the mid-nineties because it seemed to us to be the only organization willing to agitate for rural Iowans' right to exercise some control over these disruptions that, so far as we could determine, were far more the result of policy design and political agendas than mere consequences of inevitable economic change.

While the conference was essentially a public health conference, Dr. William Weida, director of the GRACE Factory Farm Campaign and Senior Status Professor of Economics and Business at Colorado College, who specializes in the regional economic impact of large projects, presented a paper entitled "Considering the Rationales for Factory Farming." This paper details a series of 19 claims that he alleges are used by proponents of factory farming to justify CAFOs from an economic point of view. For each claim, Dr. Weida lists one or more 'Necessary Assumptions' that, in his view, underlie the relevant claim, and then goes on to assert 'Reality' and 'Result' sections wherein he attempts to dismantle the particular CAFO justification in question and offer his views on the economic actuality. The paper is viewable at http://www.factoryfarm.org/docs/Foundations_of_Sand.pdf and is extensively footnoted. I was particularly interested in the discussions attending the #2 and #12 claims, centering on ideas that a) many costs of CAFOs are shifted to their neighbors and their host regions via air and water pollution and b) corporate agricultural interests, in order to reduce operating costs associated with CAFOs, exert pressure upon public regulatory agencies in ways that diminish those agencies' ability to protect public health and well-being. David Osterberg, associate clinical professor in the Department of Occupational and Environmental Health at the University of Iowa, responded to Dr. Weida's presentation, citing the many thwarted attempts by individuals and lower levels of government in the state to address CAFO environmental concerns. His implication was that, because these problems remain effectively under-addressed at higher levels of state government, 14 nuisance lawsuits are being fought in Iowa over CAFO environmental concerns. I certainly cannot imagine a less efficient way to address these problems.

I feel that the opponents to the DNR's proposed hydrogen sulfide standard are attempting to retain the ability to shift the cost of some of the CAFO-produced pollution to, as Dr. Weida suggests, neighbors and host regions of CAFOs doing the polluting. Further, as evidenced by many of the speakers at the two Mason City hearings I attended, these same interests support certain proposed so-called air-quality legislation that would effectively weaken the DNR's hand and significantly raise H2S standards so much that Dr. James Merchant, Associate Director of EHSRC and Dean of the College of Public Health at the University of Iowa testified last month before the Iowa House Committee on Agriculture that this legislation "would result in no regulation of animal feeding operations in Iowa. Rather it would encourage widespread air pollution from animal feeding operations. There is good reason to be concerned about low-level

emissions of hydrogen sulfide, ammonia and odor from animal feeding operations " I think it's also worth noting that Dr Merchant is a nationally recognized expert on occupational and environmental health and public health policy, and that he also currently serves as a consultant member of the Advisory Committee to the Director for the Centers for Disease Control (CDC) and in fact used to direct the National Institute for Occupational Safety and Health (NIOSH) which is a part of the CDC. So, when opponents of the proposed DNR H2S standard argued that they instead supported "the CDC standard," implying that somehow the proposed legislation had federally-backed scientific legitimacy, I would counter that Dr Merchant's dim view of that same legislation carries far more weight

Thanks, Bryan, for giving me the opportunity to vent a little on this very important issue. I look forward to our next Technical Advisory Group meeting on April 15

Sincerely,
Marian Kuper
10749 Co Hwy. S-55
Ackley, IA 50601

From: "Marvin Holtkamp" <msholt@iowaTelecom.net>
To: <bryan.bunton@dnr.state.ia.us>
Date: 4/8/04 10:56PM
Subject: Public comments - Air Quality Standards

Dear Sir: I oppose the proposed DNR air quality standards. I am a pork producer and I support regulations based on sound science.

To reduce emissions on my farm, I have planted shelter belts, have concrete storage pits and use phytase to reduce emissions.

Thank you for your conversations. Marv Holtkamp Lee County Farmer

April 8, 2004

Iowa DNR
Attn: Bryan Burton
Air Quality Bureau
7900 Hickman Rd
Urbandale IA 50322

Dear Bryan Burton,

This is in response to the DNR's recent proposal concerning 15 ppb (parts per billion) air quality standards.

We are small livestock producers finishing annually 140-160 head of cattle and run 40 cow/calf pairs. Our cattle are finished in an open lot with a deep bedded method with corn and bean straw.

We feel the 15 ppb standard would affect cattle producers of all sizes and is NOT supported by sound science. Does the DNR really believe it knows and understands our industry better than ISU and CDC? Has the DNR contemplated the long term impact of these regulations and their impact on the Iowa economy?

What would be the impact on other industries if environmental groups sued Iowa to enforce them on other industries as well? Iowa already suffers from an anti-ag, anti-business, pro-regulatory image. We don't need baseless and mindless rules compounding the current problem!

Therefore, we are opposed to the unscientific 15 ppb standard and urge the DNR to work with ISU and CDC for a common sense standard and a positive result.

Concerned farmers,

Kirk and Tracy Nosbisch

Kirk Nosbisch
Tracy Nosbisch



Iowa Department of Public Health

Thomas J. Vilsack
Governor

Sally J. Pederson
Lt. Governor

Mary Mincer Hansen, R.N., Ph.D.
Director

RECEIVED
APR 08 2004
Director's Office

April 7, 2004

Jeffrey Vonk
Director
Iowa Department of Natural Resources
Wallace Building
Des Moines, IA 50319

Dear Jeff:

As per your request, I recently asked my staff from the Division of Health Protection and Environmental Health to evaluate the Department of Natural Resources' (DNR) Air Quality Bureau proposed health effects standard for Hydrogen Sulfide (H₂S) that is going through the administrative rules process. This evaluation included a review of existing literature and an assessment of what other states have done to address this contaminant.

The Department of Public Health (DPH) recognizes the sensitivity in rural Iowa regarding the issue of air quality around confined animal feeding operations. Additionally, I commend your staff and the authors of the joint university report for their hard work on this issue and commitment to protecting the health of rural Iowans. The mission of DPH is *to promote and protect the health of Iowans*; therefore, I would like to provide you with the recommendation of our scientists.

The joint university report advanced the numerical standard of 15ppb/60 minutes average for H₂S, allowing for seven exceedences of this level on an annual basis. This value is reflected in DNR's current proposed rules. While this value is clearly protective of public health, my scientists have recommended that DNR consider adjusting their proposed health effects standard for H₂S to 30ppb/60 minutes average, allowing for seven exceedences on an annual basis. Given the absence of consistent empirical data on the health effects of exposure to H₂S and still recognizing that symptomology is occurring among the neighbors of confinement operations, DPH feels that 30ppb would be an appropriate health effects standard at this time. The DPH proposal is relatively consistent with the standards adopted by our neighboring states of Minnesota and Missouri.

If you have any questions or would like to discuss this further, please do not hesitate to contact me.

Sincerely,

Mary Mincer Hansen, R.N., Ph.D.
Director

Promoting and protecting the health of Iowans



IOWA FARM BUREAU FEDERATION

5400 University Avenue, West Des Moines, Iowa 50266-5997 / (515) 225-5400

April 8, 2004

Bryan Bunton
Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

RE: ARC 3092B, Hydrogen Sulfide Health Effects Value

Dear Mr. Bunton:

I am writing this letter on behalf of the Iowa Farm Bureau Federation, the state's largest general farm organization with approximately 153,000 members. Thank you for the opportunity to provide public comment on the department's proposed animal feeding operation's health effects value and standard for hydrogen sulfide. The farming community has come out overwhelmingly in opposition to this proposed rule with a margin of 4:1 in opposition to the rule at the public hearings and about 1800 individuals provided public comment against the proposed rule. Like the Governor requested of the legislature on the school funding issue, we hope that the department listens to this public comment and begins to sit down with the regulated community to develop standards that are protective of public health without the goal of creating violations of the standard in order to authorize plans and programs

We welcome the opportunity to continue discussions with the department about the adverse health effect level. We continue to support the establishment of "levels commonly known to cause a material and verifiable adverse health effect" in order to compare them against the monitoring data collected at separated locations. However, we are greatly concerned about the negative implications of the proposed rule for the citizens of Iowa and do not believe that the proposed rule meets the statutory standard in Iowa Code section 459.207.

The basis for the department's rulemaking is Iowa Code section 459.207.¹ The rule's preamble represents that the purpose of the rule is to establish the "bar" for evaluating field study data and as a threshold for determining if the department has authority to

¹ The preamble to the rule cites both Iowa Code sections 455B.133 and 459.207 as authorizing the adoption of the proposed rule. IAB Vol. XXVI, No. 14 (1/7/04) p 1175, ARC 3092B. To the extent that the proposed rule is inconsistent with Iowa Code section 459.207, it is our position that the department's general rulemaking authority under Iowa Code section 455B.133 does not remedy the inconsistency. The specific provisions of Iowa Code section 459.207 prevail over the general provisions of Iowa Code section 455B.133 in the event of a conflict. Further, the later adoption of the provisions in Iowa Code section 459.207 prevail over the provisions of section 455B.133. See Iowa Code sections 4.7, 4.8 (2003 Code Supp.)

establish air quality regulations on animal feeding operations. There is a misperception in the media and the public that the health effect value and health effect standard are only to be used for the field study. The proposed rule would make these standards permanent and applicable to other future rulemakings. The department needs to make this clear in the final adoption to the public and the EPC. But, if this is not the department's intent, the language should be amended to clarify that the standards only apply for the field study data comparisons. Iowa Code section 459.207(3)(a) says in part:

“The comprehensive plans and programs may be developed if the baseline data from the field study demonstrates to a reasonable degree of scientific certainty that airborne pollutants emitted by an animal feeding operation are present at a separated location at levels commonly known to cause a material and verifiable adverse health effect.”

In accordance with this section, the department does not have authority to even develop plans and programs until “levels commonly known to cause a material and verifiable adverse health effect” are exceeded “to a reasonable degree of scientific certainty” at a separated location.

Item 1. Definitions.

The definition of “health effects value” is identical to the statutory language in Iowa Code section 459.207 of “levels commonly known to cause a material and verifiable adverse health effect.” The rule then proceeds to say that the “health effects standard,” not the “health effects value,” is the trigger for DNR authority to develop plans and programs. The definitions themselves are in conflict with the statute. According to the statute, the trigger level would be what the proposed rule says is the “health effects value,” not the “health effects standard.” Yet, the proposed rule says that the “health effects standard” triggers DNR's authority, not the “health effects value.” As currently proposed, the rule, read in conjunction with the statute, creates inconsistency and confusion about whether the statutory trigger to develop plans and programs is either (1) More than 15 ppb for one hour; or, (2) More than 15 ppb for one hour exceeded more than seven times in a year.

Another misperception in the media and the public is that these proposed levels only apply to the largest operations in the state. While they are applicable to the largest operations, they are also applicable to every operation in the state that has a required separation distance from a separated location. The DNR chose to monitor only the largest operations in the state as a “worst-case scenario.” They were not required to do so by Iowa law. Therefore, we ask that the department clarify in its response to public comment if it intends to only regulate operations of the size and type it is monitoring or if it plans to extrapolate the results of the study to the broader base of regulated livestock operations.

Additionally, having two separate terms of “health effect value” and “health effects standard” adds another level of confusion about the practical distinction and need for two definitions and thresholds. Iowa Code section 459.207 requires one level to be set, not

two, to meet the statutory trigger to develop plans and programs. That level is the “level commonly known to cause a material and adverse health effect.” The DNR’s proposed rule is inconsistent with the statute; therefore, we recommend that the DNR consolidate the two definitions into one term that mirrors the statutory language.

We support the DNR’s description of “separated location” in the preamble to the proposed rule and agree that it is consistent with the intent of the legislation; however, this description was not carried forward to the proposed rule language. The specifications for the separated location as described in the preamble should be included in the rule or sampling manual in order to clarify the interpretation of the statute, especially in consideration of the DNR’s previous interpretations of this term.

The definition of separated location as interpreted in the rule-referenced document entitled “Iowa Air Sampling Manual” proposed rule is also inconsistent with Iowa Code section 459.207. The statute is very clear and does not provide for locating monitors 100 to 300 meters away from a separated location. While there may be a legal argument that the department may conduct the field study at any location, only data from monitors located **at** separated locations may be used to determine if the statutory trigger authorizing the development of plans and programs is met². While as an organization representing farmers and as a member of the Iowa Air Quality Coalition, we might support legislative changes to provide more flexibility in monitor location, the authorizing statute does not provide such flexibility. The department’s rule by including this provision in the “Iowa Air Sampling Manual” is contrary to Iowa law.

Item 2, Proposed Rule 32.1 Health Effects Value for Hydrogen Sulfide

The proposed rule sets a “health effects value” of “15 ppb, daily maximum one-hour average as measured near a separated location.” It also sets a “health effects standard” that allows the “health effects value” to be exceeded 7 times a year. These standards, as do all air quality standards, include a concentration dose and duration of time to determine the exposure level. The preamble to the rule says that these standards will be reviewed every five years; however, the proposed rule does not require or indicate that such a review will take place. If the department is going to review the standard in five years should be in the regulation. Otherwise the claim of a having a five-year review is not binding or certain.

Neither the “health effects value” nor the “health effects standard” meet the requirement of Iowa Code section 459.207(3) that requires the use of “levels commonly known to cause a material and verifiable adverse health effect” as the legal threshold that authorizes the department to develop plans and programs. While at some level hydrogen sulfide can cause an adverse health effect, this level is not at 15 ppb concentration dose over a one-hour average exposure duration.

² See Iowa Code section 459.207(3) (2003) which says in addition to the excerpt cited on page 1 that “Any air quality standard established by the department for animal feeding operations shall be based on and enforced at distances measured from a confinement feeding operation structure to a separated location.”

The 15 ppb, one-hour standard, for hydrogen sulfide has not been represented in peer-reviewed published research to cause a "material and verifiable adverse health effect." The preamble to the rule makes an assertion that the health effects value is "based on commonly known and accepted health risk data,"³ but it fails to provide any citation to the source of the data. The department has not responded to requests for scientific references to data or peer-reviewed published studies showing a material and verifiable adverse health effect at 15 ppb over a one-hour average.⁴ In fact, existing relevant peer-reviewed, published literature shows no adverse health effect from hydrogen sulfide at a concentration dose of 15 ppb for a one-hour duration.

On July 21, 2003, department staff provided a handout to the Environmental Protection Commission outlining the options for establishing air quality standards. The handout included an option 5 which was presented as follows:

"Request that the legislature adopt new legislation clarifying that formulation of any Iowa Ambient Quality Standard must conform to the Clean Air Act requirements including an adequate margin of safety in setting health standards for ambient air, and that human welfare also be allowed as a basis for setting ambient air quality standards."⁵

The handout also lists as an example in its options for establishing standards that hydrogen sulfide may be measured as a "substitute for odor."⁶ Iowa Code section 459.207 does not include language that is included in the Clean Air Act which allows standards to be set more restrictive to allow for "an adequate margin of safety" or for "public welfare from any known or anticipated adverse effects" as is included in the provisions authorizing national primary ambient air quality standards in the Clean Air Act.⁷ The statutorily required level in Iowa Code section 459.207 also does not include subjective allowances for "public welfare" as allowed in Iowa Code section 455B.133(3) which is DNR's general rulemaking authority for ambient air standards.

The statute requires the levels to be those that cause material and verifiable adverse health effects. The statute does not include a margin of safety, does not account for nuisance or odor effects within a hydrogen sulfide standard, and does not take into account public welfare from anticipated adverse effects. To the extent that the department or the University Report recommendation included any of these factors in

³ IAB Vol. XXVI, No. 14 (1/7/04) p. 1176, ARC 3092B

⁴ On March 3, 2004, Bryan Bunton was interviewed on KIMI television and was quoted saying the following: "If someone's exposed to 15 parts per billion over extended period of time, they could encounter some unwanted health effects. It's a respiratory ailment, so it could affect the lungs and the brain." After several phone calls requesting the source of this assertion, the request to identify the research that supported this statement was put in writing on March 9, 2004 by the undersigned to Bryan Bunton. To this date, no response has been provided to the request.

⁵ Environmental Protection Commission Meeting Handout, "Options for Establishing Air Standards for Hydrogen Sulfide, Ammonia and Odors," July 21, 2003, p. 2.

⁶ *Id.* at p. 4.

⁷ 42 U.S.C. 7409(b).

making its decision on the proposed standard, it is inconsistent with Iowa law.⁸ While as an organization we may support a level that is more protective of public health than the actual health effect level, the statute does not provide the department with this flexibility. The minimal risk levels included in House File 2523 provide greater protection for public health than the current statute authorized the department to adopt.

The only basis provided by DNR for the proposed standard is a recommendation contained in a literature review conducted by the University of Iowa and Iowa State University over a few months in late 2001 and early 2002.⁹ The goal of the report was to “ensure that rural ambient air is as free of risk as possible in order to protect health and the quality of life at the highest possible level.”¹⁰ This is a different goal than the legislative directive in Iowa Code section 459.207. The University Report was not written within the statutory mandate of determining a material and verifiable adverse health effect; and, clearly was intended to go beyond protection from adverse health effects.

Many of the individuals providing public comment seemed to believe that the regulation of hydrogen sulfide was the same as regulating odor. While hydrogen sulfide has an odor and can be detected once the level reaches approximately 8 ppb, there is no statistical correlation between hydrogen sulfide and odor. Hydrogen sulfide is not an indicator gas for odor concentrations.¹¹ The Iowa Department of Public Health summarized this in a position paper saying “While odors from pork operations may occasionally be distracting or irritating, they do not directly pose a physical health risk.”¹² Smelling a livestock operation does not mean there are adverse health effects. We ask the department to clarify in its responsiveness summary that this regulation does not address odor, only adverse health effects from hydrogen sulfide exposures. Reducing the health effect level

⁸ For example, several commenters referenced other state standards such as Minnesota and Missouri in their public comment. According to the July 21, 2003 handout, both of these state standards are based on nuisance considerations and were not health-based standards. See *Id.* note 4, p. 9-10. See also, handout provided by DNR staff during the June 25, 2002 Air Quality Monitoring Technical Advisory Committee meeting entitled “Table 10 1: Summary of State H₂S/IRS Standards”. However, note that we were unable to confirm the standards in the state’s applicable administrative rules for the states represented in these two handouts in some cases and found contradictory information in other cases. The Minnesota and Missouri standards were confirmed to be represented correctly in the two handouts. Because we do not know the basis for many of the other state’s standards, the margin of safety applied or other considerations used in reaching those standards, they should not be used as a justification for the Iowa hydrogen sulfide standard. Further, other states authorizing legislation is different than Iowa law; and, therefore the resulting standards cannot be used as a basis for comparison in establishing Iowa’s standard.

⁹ Iowa Concentrated Animal Feeding Operations Air Quality Study (Final Report) February 2002. (Hereinafter University Report)

¹⁰ University Report at p. 4.

¹¹ See National Center for Manure and Animal Waste Management, *Odor Mitigation for Concentrated Animal Feeding Operations*, October 1, 2001 at 7; *Detection Threshold Determination for Hydrogen Sulfide*, S. Hoff & D. Bundy, ASAE Paper No. MC02-404, April 12-13, 2002, (“Using ammonia or hydrogen sulfide as surrogate measurement for odor are not appropriate. Hydrogen sulfide and ammonia have suggested ambient air quality limits from a human health perspective, such as those given in Table 1 (ATSDR) and these should not be adjusted for use as an indicator of odor nuisance.”).

¹² *Risks from Large-scale Livestock Operations in Iowa*, Iowa Department of Public Health, January 2001, p. 14.

for hydrogen sulfide in an attempt to address odor concerns is not appropriate scientifically. Odor should be addressed as a separate issue from a hydrogen sulfide adverse health effect level.

The University Report recommended a level of 15 ppb over a one-hour time weighted average for hydrogen sulfide. However, this recommendation was not based on peer-reviewed, published research indicating that "material and verifiable adverse health effects" occur at this level from exposure to hydrogen sulfide. Further, the report states "There has been no published literature on dose-response relationship of CAFO emissions and life quality or chronic health effects among community residents."¹³ Both Universities have concurred in correspondence to the department since the report was released that the recommended levels were based on health-based limits by the Agency for Toxic Substances and Disease Registry (ATSDR), an agency of the U.S. Centers for Disease Control.¹⁴ ATSDR is an internationally recognized, reputable public health agency whose recommendations were the starting point for the recommendation in the University Report. The University Report states that the ATSDR "MRLs are set to protect sensitive individuals, and that there is a safety factor built in as they are set below levels that might cause adverse health effects."¹⁵ "Exposure to a level above the MRL does not mean that adverse health effects will occur."¹⁶ In accordance with the earlier discussion, even the MRLs are below levels that cause adverse health effects and therefore are below the levels that were intended by Iowa Code section 459.207 when it uses the terms "commonly known to cause material and verifiable adverse health effects."

In addition to its failure to meet the statutory standard, the University Report recommendation is no longer supported because of at least two key assumptions made when modifying the ATSDR MRLs.

The University Report's recommendation halved the intermediate (15-364 days of exposure) ATSDR level of 30 ppb "due to assumed synergistic responses to simultaneous exposure of hydrogen sulfide and ammonia"¹⁷ In public presentations on results from their monitoring, DNR staff has said and shown through charts that their monitoring data shows that the two compounds do not appear simultaneously.¹⁸ Iowa State University has confirmed this finding stating "The maximum hydrogen sulfide and ammonia levels

¹³ University Report at p. 176.

¹⁴ Dr. James Merchant correspondence to DNR Director Jeff Vonk dated September 8, 2003; Public Comment provided by Iowa State University Air Quality Research Group dated January 6, 2003; Correspondence and attachments from Dr. Catherine Woteki to DNR Director Jeff Vonk dated November 14, 2003.

¹⁵ University Report at p. 176.

¹⁶ Toxicological Profile of Hydrogen Sulfide; <http://www.atsdr.cdc.gov/toxprofiles/tp114.html>

¹⁷ Public Comment provided by Iowa State University Air Quality Research Group dated January 6, 2003. See also University Report at 8 ("The U.S. EPA has determined that simultaneous exposure of two substances such as hydrogen sulfide and ammonia (both pulmonary irritants) results in an additive effect. Thus, in order to protect against the adverse effects of such binary mixtures, the exposure limit for each should be reduced accordingly.")

¹⁸ Presentation given by Catharine Fitzsimmons, August 15, 2003, Governor's Public Health Conference; Presentation given by Sean Fitzsimmons, August 18, 2003, Environmental Protection Commission

do not typically peak at the same hour of the day or day of the year at swine sites.”¹⁹ Couple this finding with the fact that a standard for ammonia is not proposed by DNR and the justification for the department halving the ATSDR standards no longer exists. If only one gas is being measured, there is little basis for regulating according to double exposure especially when the department’s field study data shows that they are not simultaneously present.

Iowa State University has recognized this fact and has communicated this to the department several times over the past fifteen months. The Iowa State University Air Quality Research Group in its January 6, 2003 public comment on the department’s previous rule-making, stated that this very practice of halving the dose level to 15 ppb is “an unfair practice for instances where hydrogen sulfide and ammonia do not occur simultaneously.” The University followed up in a November 14, 2003 correspondence to Director Vonk stating “We view it as a mistake to arbitrarily reduce by half the ATSDR recommendations.” Additionally, Dr. Wendy Wintersteen, testified to the EPC at its December 15, 2003 meeting that Iowa State University no longer supported the University Report recommendations in part because of this issue.²⁰ She said in part that:

“We strongly encourage following Federal established guidelines of ambient air quality levels published by the Agency of Toxic Substances and Disease Registry (ATSDR). . . . Based upon the data collected by the University of Iowa Hygienic Laboratory, setting the limit for hydrogen sulfide at 15 ppb with no more than 7 time of 1-hr exceedance is too restrictive and is not consistent with the MRL’s presented by ATSDR.”

The Joint University Report also assumed that neighbors to livestock operations were exposed to hydrogen sulfide and ammonia for long-term durations. The University Report states that:

“While emissions from CAFOs fluctuate over time, they produce chronic rather than acute exposures. Rather than representing single doses, these exposures are recurring and may persist for days with each episode.”²¹

The University of Iowa has also stated in correspondence to Director Vonk that the community is “exposed to air emissions 24 hours a day, seven days a week over a period of years.”²² Again, an evaluation of DNR monitoring data from the field study demonstrates that this is not the case. If there was an exposure at the monitors over the 15 ppb, 1 hour average, the 2003 data didn’t show it occurring for any longer than 1-3 hours. If the University Reports hypothesis were true, the DNR’s summary of 2003 Hourly Data should show an average exposure over 15 ppb. Two sites showed an average of zero, three sites show an average of 1 ppb and one site located approximately

¹⁹ Public Comment provided by Dr. Wendy Wintersteen, Environmental Protection Commission Meeting minutes, December 15, 2003, p. 33-34.

²⁰ *Id.*

²¹ University Report at p. 8

²² James Merchant correspondence to DNR Director Jeff Vonk dated September 8, 2003

300 feet from the lagoon of the largest confinement facility in the state had an average exposure of 9 ppb. The field study shows that the University Report recommendation chose an inappropriate value to represent the duration of exposure that is actually occurring in rural Iowa. Since the exposure is acute (short term), not chronic, the acute ATSDR MRL would have been more appropriate. Iowa State University has stated officially "An evaluation of the data shows that the duration of exposure is more consistent with an acute exposure (exposure of 1 to 14 days)."²³ Additionally, the one-hour averaging time is not appropriate since it does not match the acute or intermediate durations represented by ATSDR. The acute duration is 1-14 days of exposure and the intermediate duration is 15-364 days of exposure.

The University Report recommendation is no longer a valid basis for the proposed hydrogen sulfide standard of 15 ppb over a one-hour average for many reasons. First, the recommendations were not based on the statutory standard but a more stringent goal. Second, the University Report reduced the intermediate ATSDR MRLs to reach the 15 ppb over a one-hour average as an acute value when the justifications for those reductions have been shown to be invalid by DNR's own monitoring data. Exposures to hydrogen sulfide to neighbors of livestock operations are for a sub-acute duration (1-3 hours), not for intermediate or chronic durations. It is inappropriate to use an intermediate MRL to measure acute exposures. It is also inappropriate to use a one-hour average, which is a sub-acute duration, to represent an ATSDR acute duration of 1-14 days of exposure. Further, it is inappropriate to halve the intermediate ATSDR value for binary exposures when only one gas is being regulated and when exposures to hydrogen sulfide and ammonia are not binary. While the University Report does describe some of the available scientific literature, the department should abandon the Report's public policy recommendation on a hydrogen sulfide standard.

The University Report does cite to literature on health effects from hydrogen sulfide.²⁴ It concludes "These experimental studies indicate consistent patterns of adverse health effects after short, low concentrations of exposure to hydrogen sulfide." To view this conclusion in context, the department should investigate what the report meant by "low concentrations." Most of the studies presented by the University Report were those outlined in the ATSDR's toxicological analysis of hydrogen sulfide as studies investigating public and are consolidated in Table 1. The lowest level in the ATSDR peer-reviewed studies show to cause an adverse health effect was 2000 ppb exposure for 30 minutes in asthmatics. The University Report did not conclude that the studies showed health effects from hydrogen sulfide after exposures at 15 ppb for a one hour average.

The University Report also cites to epidemiological studies of the impact of hydrogen sulfide on community residents; however, also noting their limitations that "these are invariable mixed exposures to hydrogen sulfide and other chemicals, some of which may contribute to the adverse health effects described in these studies."²⁵

²³ Environmental Protection Commission meeting minutes, December 15, 2003, p. 34.

²⁴ University Report at p. 124-126.

²⁵ *Id.* at p. 126.

As described earlier in this letter, Iowa Code section 459.207 requires the level to be “commonly known to cause a material and verifiable adverse health effect.” The basis for the 15 ppb, one-hour average, was reduced from ATSDR MRLs. “MRLs are derived when the ATSDR determines there is sufficient data to determine specific and sensitive health effects for a specific duration.”²⁶ The acute and intermediate MRLs for hydrogen sulfide contain a 30 times safety factor to account for variability among sensitive populations.²⁷ ATSDR based its MRLs on peer-reviewed scientific research which indicates what health effects occur at what levels of exposure.

Table 1: Levels of Significant Exposure to Hydrogen Sulfide-Inhalation in Humans

Source: Agency for Toxic Substances and Disease Registry, 1999²⁸

Exposure Duration	System	NOAEL* (ppb)	LOAEL** (ppb)	Notes	Reference
>16 min	Respiratory	5000			Bhambhani and Singh, 1991
	Cardio	5000			Bhambhani et al. 1994
	Metabolic	2000	5000	Increased blood lactate during exercise	
30 min	Respiratory	5000			
	Cardio	5000			Bhambhani et al 1996a
15 min	Respiratory	10000			
2 x 30 min	Musc/skel		5000	Decrease in citrate synthase when exercising at 50% maximum aerobic power	Bhambhani et al. 1996b
2 x 30 min	Cardio	10000			Bhambhani et al. 1997
	Metabolic		10000	Increase in blood lactate and decrease in oxygen uptake	Jappinen et al 1990
30 min	Respiratory		2000	Bronchial obstruction in 2/10 asthmatics	

* No observed adverse effect level

** Lowest observed adverse effect level

The health effect levels utilized by ATSDR in setting their MRLs showed a “no observed adverse effect level” (NOAEL) to the respiratory system at 5000 ppb. It also showed a “lowest observed adverse effect level” in two out of ten asthmatics at 2000 ppb. These levels are far higher than the proposed level of 15 ppb, which indicates an arbitrary reduction in the actual verifiable adverse health effect level.

The two universities found it important to base their recommendations on federally determined levels and specifically the levels recommended by ATSDR. Iowa State

²⁶ University Report at p. 176

²⁷ Toxicological Profile of Hydrogen Sulfide; <http://www.atsdr.cdc.gov/toxprofiles/tp114.html>

²⁸ *Id*

University stated in its November 14, 2003 correspondence to Director Jeff Vonk that “it is so important to base an Iowa ambient air standard on federally determined levels.”²⁹ There are many other federally determined levels that are instructive for these discussions are contained in Table 2.

Table 2: Nationally Recognized Standards for Hydrogen Sulfide³⁰

Agency	Level	Averaging Period
OSHA	20,000 ppb	8-hour exposure
NIOSH	10,000 ppb	8-hour exposure
AGCIH	10,000 ppb	8-hour average
AIHA	100 ppb	8-hour average
ASTDR (CDC)	70 ppb	1-14 days of continuous exposure
ASTDR (CDC)	30 ppb	15-364 days of continuous exposure
EPA	7 ppb ^{*31}	70 years of 24/7 continuous exposure

Additionally, the World Health Organization (WHO) has adopted a standard for hydrogen sulfide that could be examined to determine an appropriate acute exposure level. The WHO has adopted a hydrogen sulfide standard of 107.9 ppb over a 24 hour average.³² Although it does not represent the decisions or policy of the WHO, a WHO published report also contains recommendations for hydrogen sulfide exposures.³³ It recommends a concentration dose of 72 ppb for a duration of 1-14 days with an uncertainty factor of 30. The report relied on the same study as ATSDR in arriving at its recommendation for the short-term tolerable concentration.

The WHO report also recommended a medium term tolerable concentration of 14.4 ppb for a 90-day exposure. An uncertainty factor of 30 was applied to arrive at the value. The value was based on a no observed adverse health effect level result from a study of nasal lesions in rats. Even if the DNR was to consider using the WHO medium term value as the level that is commonly known to cause material and adverse health effects, it would need to adjust the value to be consistent with Iowa law. It would have to use the appropriate duration of exposure of 90 days and would have to back out the 30 times safety factor since the statute does not allow for this accommodation in the field study. Table 3 represents the report findings of the international panel of experts of relevant studies indicating human health effects from exposure to hydrogen sulfide.

²⁹ Correspondence and attachments from Dr. Catherine Woteki to DNR Director Jeff Vonk dated November 14, 2003; attachment dated October 27, 2003

³⁰ OSHA (U.S. Occupational Safety and Health Administration); NIOSH (The National Institute for Occupational Health and Safety); ASTDR (U.S. Agency for Toxic Substances and Disease Registry); AIHA (American Industrial Hygiene Association); AGCIH (American Conference of Governmental Industrial Hygienists); EPA (U.S. Environmental Protection Agency)

³¹ Contains a safety factor of 1000 times

³² *Air Quality Guidelines for Europe, 2nd ed.*, Copenhagen, World Health Organization Regional Publications, European Series.

³³ Concise International Chemical Assessment Document 53, *Hydrogen Sulfide. Human Health Aspects*, World Health Organization, 2003.

The National Academy of Sciences also has commented on the levels at which health effects occur from exposure to hydrogen sulfide.³⁴ No human studies were listed for chronic exposures to hydrogen sulfide, but several human studies for acute exposures were acknowledged. The NOAEL for respiratory, cardiovascular and metabolic effects on humans ranged from 2000 to 10,000 ppb for one exposure of 15 minute to two exposures of 30 minutes each. Headaches were reported in 3 out of 10 asthmatics exposed to 2000 ppb for 30 minutes. The preamble to the proposed rule states "This rulemaking is consistent with the recommendation for hydrogen sulfide found in the NAS Report."³⁵ Contrary to this assertion, the NAS report does not make a recommendation on what is the appropriate regulatory adverse health effect level and in fact does not make any conclusions about a recommended adverse health effect level. In fact it says "[T]here is little scientific evidence that exposure of humans outside the AFOs themselves has significant effects on human health because the concentrations are usually below threshold levels."³⁶ Again, like other nationally recognized public health expert reports, none of the human health effect levels reported by the National Academy of Sciences are at 15 ppb over a 1 hour average exposure duration.

Table 3: Human Health Effects at Various Hydrogen Sulfide Concentrations

Source: World Health Organization, 2003

Exposure (ppb)	Effect/Observation	Reference
8	Odor Threshold	Amoore & Haultala, 1983
2,014	Bronchial constriction in asthmatic individuals	Jappinen et al., 1990 ³⁷
3,596	Increased eye complaints	Vanhoorne et al., 1995
5,034	Increased blood lactate concentration, decreased skeletal muscle citrate synthase activity, decreased oxygen uptake	Bhambhani & Singh, 1991; Bhambhani et al., 1996b, 1997
3,596	Eye irritation	IPCS, 1981
20,135	Fatigue, loss of appetite, headache, irritability, poor memory, dizziness	Ahlborg, 1951
100,676	Olfactory paralysis	Hirsch & Zavala, 1999
402,704	Respiratory distress	Spolyar, 1951
503,380	Death	Beauchamp et al., 1984

Public comment on this rulemaking was made regarding a WHO recommended level of 5 ppb over a 30 minutes average.³⁸ This is reported in the criteria document as a nuisance level, not a public health level. The public health level reported in the criteria was 7000 ppb for an 8-hour average and 10,000 ppb for a 10-minute duration.

³⁴ Air Emissions from Animal Feeding Operations: Current Knowledge, Future Needs, National Academy of Sciences, 2003, p. 67. (Hereinafter NAS Report)

³⁵ IAB Vol. XXVI, No. 14 (1/7/04) p. 1178, ARC 3092B

³⁶ NAS Report, p. 66.

³⁷ Jappinen P, Vilkkä V, Marttilä O, et al. 1990 Exposure to hydrogen sulphide and respiratory function. Br J Ind Med 190:3-16.

³⁸ Environmental Health Criteria 19, Hydrogen Sulfide, World Health Organization, 1981

Public comment was also made regarding a study out of Dakota City and South Sioux City, Nebraska.³⁹ The study did not involve any residents living near animal feeding operations, but a beef slaughter plant, leather tanning facility, wastewater lagoon for a truck wash and a municipal wastewater treatment facility. The public comments made do not reflect the entire picture of the study results and its limitations.

There are many limitations to the applicability of the South Sioux City findings. The study indicates that it based its comparisons of hospital records from zip codes. It did not correlate a hospital visit to an exceedance at a particular monitor because it did not have the addresses of the persons who made the hospital visits. Persons may not have been exposed to hydrogen sulfide at the time one of the monitors showed an exceedance of the 30-minute average. The study was also skewed because it did not count days with incomplete data where the values were less than 30 ppb but counted incomplete days where the values were over 30 ppb.

Additionally, while the South Sioux City study chose a threshold value of 30 ppb, it did not correlate the amount of the exceedance over 30 ppb or the total duration of the exceedance to hospital visits. If there was one reading over 30 ppb for a 30-minute period, it was registered as a high level. ATSDR monitoring in the area shows chronic exposures at levels higher than 30 ppb. For example, a person may have been exposed for 364 days at 40 ppb and the study would not have made a distinction between that person and someone who has only been exposed for 30 minutes at 31 ppb. This is important because it means that the only thing the study shows is that for some duration at some value over 30 ppb, hydrogen sulfide caused an increase in health effects to asthmatic individuals. The study does not show that health effects occur from exposures to hydrogen sulfide at 30 ppb over a 30-minute average. To further add to the discussion, ATSDR does not consider the results of the study to be conclusive.⁴⁰

Public comments were also provided concerning asthma as a health effect from hydrogen sulfide referencing a University of Iowa study of Keokuk County, Iowa. The study did not take readings of levels of hydrogen sulfide or any other gas so it cannot be used as a determinant of whether hydrogen sulfide exposures, if any, to Keokuk County children caused asthma. The study did say "the probability of being given a diagnosis of asthma and of having severe symptoms was equivalent for farm and nonfarm residents"⁴¹

Dr. Merchant has also commented about the limitations of the Keokuk County study. In a letter to the editor of the Des Moines Register, Dr. James Merchant said, "The Register story also used inappropriate comparison data to make the point that Keokuk county Rural Health Study asthma prevalence appeared to be much higher than either cited national or state figures. Clinically based data cannot be used to make such comparisons

³⁹ Campagna D, Kathman SJ, Pierson R, Inserra SG, Phifer BL, Middleton DC, Zarus GM, White MC. *Ambient hydrogen sulfide, total reduced sulfur, and hospital visits for respiratory diseases in northeast Nebraska, 1998-2000*. Journal of Exposure Analysis and Environmental Epidemiology 14: 180-187, 2004

⁴⁰ M. Kavar, *Study unable to find effects from gas levels*, Omaha World Herald, September 12, 2002.

⁴¹ Chrischilles E, Ahrens R, Kuehl A, Kelly K, Thorne P, Burmeister L, Merchant J, *Asthma prevalence and morbidity among rural Iowa schoolchildren*. Journal of Allergy and Clinical Immunology 113: 66-77 (2004).

⁴² In the same letter he also said that the study “did not address whether asthma risk extends to children or others living in proximity to such farms.” In a Feedstuffs article, Dr. Merchant was directly quoted as saying that “Extrapolation of increased risk of asthma to children who live on hog farms was a misrepresentation of the study, which is very unfortunate.”⁴³ The article also went on to say that Dr. Merchant said that they can’t answer the question about whether concentrated animal feeding operations result in an increased risk of childhood asthma in Iowa because the study did not address it. Any attempt to extrapolate the findings of the Keokuk County asthma study to mean that animal feeding operations cause increases in childhood asthma is inappropriate.

To summarize, Iowa Code section 459.207 requires that the level be a level that is “commonly known to cause a material and verifiable adverse health effect.” The peer-reviewed relevant research does not demonstrate that 15 ppb over a one-hour average meets this statutory standard.

Item 2, Proposed Rule 32.2, Implementation of the Standard

Proposed rule 32.2 addresses implementation issues associated with plans and programs that may be developed dependent on the field study results. Proposed rule 32.2(1) says that “for purposes of the field study” plans and programs may be developed. This is a misstatement of Iowa Code section 459.207(3) which says that

“After the completion of the field study, the department may develop comprehensive plans and programs for the abatement, control, and prevention of airborne pollutants originating from animal feeding operations in accordance with this section. The comprehensive plans and programs may be developed if the baseline data from the field study demonstrates to a reasonable degree of scientific certainty that airborne pollutants emitted by an animal feeding operation are present at a separated location at levels commonly known to cause a material and verifiable adverse health effect. The department may adopt any comprehensive plans or programs in accordance with chapter 17A prior to implementation or enforcement of an air quality standard but in no event shall the plans and programs provide for the enforcement of an air quality standard prior to December 1, 2004.”⁴⁴

However, the proposed rule language is more consistent with the present approach of the department. We have concerns with how the provisions of the statute are being interpreted and implemented by the department. The department has been developing plans and programs before the completion of the field study and before the field study results show adverse health effects at separated locations from animal feeding operations. We believe this is contrary to Iowa law. The preamble to the proposed rule states:

“If conditions that would trigger the development of plans and programs are met, development of best management practices, mechanisms, processes, or

⁴² Des Moines Register, November 16, 2003

⁴³ M. Howie, *Hog Industry Insider*, Feedstuffs, November 10, 2003 at 30.

⁴⁴ Iowa Code section 459.207(3)(a)(emphasis added)

infrastructure will initially be completed through consultation with work groups. The Department plans to convene several work groups to solicit input from technical experts in the areas of dispersion modeling, emission characterizations, and best management practices.”⁴⁵

During the September 15, 2003 Environmental Protection Commission meeting, Mr. Wayne Gieselman presented agenda item 15 that stated in part:

“As the dialogue concerning standards continues, we believe it is prudent to begin work to determine a set of reasonably available control technologies, acceptable dispersion models and emissions estimations techniques applicable to animal feeding operations. Toward this end, the department intends to convene several technical advisory groups consisting of stakeholders and technical experts in order to develop consensus on these essential elements required to implement a regulatory program for confinement animal feeding operations.”⁴⁶

The meeting minutes also reflect that Mr. Gieselman verbally informed the commission about the department’s plans for the formation of technical advisory groups to look at “dispersion modeling, emission characteristics and best management practices.”⁴⁷ On several other occasions, in meetings or conversations with department staff at which the undersigned was present, the department indicated its intent to utilize work groups to assist in the development of plans and programs.⁴⁸

A letter was received in early January by the undersigned from Director Jeff Vonk inviting the Iowa Farm Bureau to participate in the work groups.⁴⁹ The letter states that “The Iowa Department of Natural Resources is in the process of establishing technical work groups to assist with determining best management practices, ambient air modeling methodology and air emissions characterization that may be used in the future development of plans and programs related to air emissions from animal feeding operations.” The described work groups met on February 5, 2004 and March 4, 2004.

First, the Code clearly requires that the field study be completed before the Department develops any plans and programs. Initiating development of the plans and programs is premature as a matter of law when the field study is not yet completed. Further, the formation and meeting of working groups is the development of plans and programs.

Second, the Code clearly states that plans and programs may only be developed if the data from the field study shows to a reasonable degree of scientific certainty that airborne pollutants emitted by an animal feeding operation are present at a separated location “at levels commonly know to cause a material and verifiable adverse health effect.” From

⁴⁵ IAB Vol. XXVI, No. 14 (1/7/04) p 1178, ARC 3092B

⁴⁶ Environmental Protection Commission Minutes, September 15, 2003, p 18 (*emphasis added*).

⁴⁷ *Id*

⁴⁸ Meetings include but are not limited to those that occurred on August 13, 2003, December 12, 2003, and January 6, 2004

⁴⁹ Correspondence dated January 8, 2004 to Christina Gruenhagen from Director Vonk.

the information made available from the Department at this time, it is clear that more monitoring data is needed due to the improper location of many stationary monitors collecting data on hydrogen sulfide and ammonia. It is our understanding that these monitors have been or will be relocated to comply with the requirements of separated locations under Iowa Code section 459.207. Much more data from properly located monitors is essential before plans and programs may be developed.

Work on "air emission characterization", "ambient air modeling methodology" and "best management practices" has been ongoing for years at many land grant universities, including Iowa State University. Best management practices are routinely evaluated at Iowa State University, the University of Purdue and North Carolina State University, among others. Air modeling methodology and air emission characterization research has been and is ongoing at Iowa State University, the USDA's National Soil Tilth Laboratory in Ames, and at many other research institutions, often funded in whole or in part by Iowa's agricultural organizations and Iowa's livestock producers. Research papers resulting from these activities are published, and the results are communicated through the trade associations. Many livestock producers have already adopted best management practices to address odor and quality of life issues because of these efforts. If the intent of the department in forming these work groups is to have more producers voluntarily adopt recommended practices,⁵⁰ there are more appropriate forums in which to do it than the DNR regulatory process, such as the Iowa Manure Management Action Group, Iowa State Extension or communications through the agricultural associations.

We continue to welcome participation in work groups at the appropriate time to assist the department in developing plans and programs. However, we are sincerely concerned about the legality of the timing and formation of these working groups, as the Department has proposed. Therefore, we and the other Iowa Air Quality Coalition members decided not to participate in the work groups, but to continue to inform and educate producers about recommended practices and to invest in solutions to solve the problems in rural Iowa. If proposed rule 32.2(1) were to mirror the statutory language we would be supportive of the language, but we have concerns with how it is being implemented and interpreted by the department.

Proposed rule 32.2(2) also misstates current Iowa law. It says that the air pollution controls cannot be implemented prior to December 1, 2004. Current Iowa law actually says that enforcement of an air quality standard cannot occur before December 1, 2004.⁵¹ Further, it is unclear whether "air pollution controls" would be mandated practices or recommendations as allowed and required by Iowa Code section 459.207(3)(c).

Item 2, Proposed Rule 32.3 Iowa Air Sampling Manual

Proposed Rule 32.3 references the Iowa Air Sampling Manual which in turn references the Quality Assurance Project Plans and Standard Operating Procedures. We have several concerns with the sampling manual.

⁵⁰ Correspondence from Wayne Gieselmann to Christina Gruenhagen dated February 2, 2004.

⁵¹ Iowa Code section 459.207(3)(a) (2003)

In the first section of the sampling manual entitled "Monitor Siting Requirements" we have previously expressed concerns, both in this public comment and over the past few years in meetings with DNR staff and Environmental Protection Commissioners, about the monitor location in relation to a separated location. The sampling manual allows monitors to be placed up to 300 meters away from a residence. This is especially concerning when the monitor may be closer to the livestock operation than the residence. Iowa Code section 459.207 requires the monitors to be located **at** separated locations to be considered for the plans and programs trigger. While we are supportive of a legislative change as detailed in House File 2523 to provide more flexibility for the department in locating monitors within EPA monitoring protocols, we do not support allowing monitors to be placed 100 to 300 meters away from the residence and the current statute does not allow it. It is important to determine whether there are adverse health impacts at separated locations, not at a location that is 984 feet away from the residence where the neighbors aren't residing.

Paragraph 2 of the first section in the sampling manual discussed flow obstructions. We are concerned that in the effort to comply with EPA monitoring protocol, the monitor location will avoid or minimize emission abatement techniques such as trees. The data should reflect actual conditions as much as possible.

The siting requirements also require the monitors to be set back from a road in order to avoid collection of data from vehicle emissions of hydrogen sulfide. It is curious that emissions from vehicles are high enough to be of concern and to have an impact on the data collection. It leads us to question the potential health impacts of vehicle hydrogen sulfide emissions on residents near more traveled roadways.

We have major concerns with the department's calculations for determining there has been a day of exposure. The computations are not consistent with ATSDR's requirements for acute or intermediate exposure durations of 1-14 or 15-364 days of continuous exposure. The computation results in the maximum hourly average counting as if it were the exposure for an entire day. Combined with the data completeness requirements of only needing 45 minutes of data to count as 60 minutes, the computations would represent that 6 hours of intermittent exposure throughout the year could cause a health effect at 15 ppb. It is inappropriate to compare an acute exposure of six hours over a year to an intermediate health level to determine whether there is a potential for an adverse health impact. This is compounded when the 75% data threshold is not met and there is one hour of exceedance. The sampling manual allows for data to count even if there isn't 18 hours of data collected if there is an exceedance during one hour. We do not support the department's computation methodology as it compounds the issue of establishing an inappropriate adverse health effect level.

The most current Quality Assurance Project Plans and Standard Operating Procedures need to be made available to the public. Not including these documents as rule-referenced documents will allow for changes to the monitoring protocols without public input or knowledge of the changes. We suggest that these documents also be rule-

referenced documents or at a minimum be made accessible to the public so that they know when changes are made and can access the most recent version of these documents.

Iowa Farm Bureau also has concerns with the reliability and accuracy of the equipment DNR is proposing to use to determine whether there are violations of the health effect level and health effect standard. The National Academy of Sciences has questioned the accuracy of the available equipment. Its report on livestock emissions stated "The consistency and accuracy of H₂S analyzers have to be better understood, and proper usage and calibration procedures must be developed."⁵² It also said "Scientifically sound and practical protocols for measuring air concentrations, emission rates, and fates are needed for various elements (nitrogen, carbon, sulfur), compounds (e.g. ammonia [NH₃], [methane] CH₄, [hydrogen sulfide] H₂S), and particulate matter."⁵³ This concern is magnified with the proposed requirements for accuracy and precision. There is only a requirement of 95% probability that the precision be ± 15% and the accuracy be ± 20%. This brings into serious question the accuracy of any of the DNR data collected within this large margin of error allowance. If the department is going to allow such a margin of error, any reading within it should not be counted as being over the health effects value. Otherwise, the accuracy of the data collection is open to challenge by the farming community.

The Iowa Farm Bureau appreciates the department making the data from its monitoring stations available to the public; however, we have concerns about the availability of the data on the web site from locations that are not locations that should be compared against the health effects value for purposes of the statutory trigger. The continued display on the web site of the data from these locations leaves a false impression with the public that the proposed health effect value should be compared against this data. Iowa State University has also expressed its concern about the perception given to the public by this data being presented in this manner in public forums as representative of exceedances of the University Report recommendation.⁵⁴ We respectfully request that the department not represent data collected at locations other than at separated locations as being in violation of the health effects value or the University Report recommended levels. We also ask that this information continue to be available to the public with a disclaimer that it should not be compared against the health effects value or that it not be made available on the DNR's web site.

Conclusion

While the Iowa Farm Bureau supports establishing a level for hydrogen sulfide "commonly known to cause material and verifiable adverse health effect", it does not support the proposed "health effects value" or "health effects standard" because they are not based on the best scientific information available and because they are not consistent with Iowa law. The University Report is not appropriately relied upon to set the value of 15 ppb over a one-hour average because the report clearly is no longer a consensus report

⁵² NAS Report, p. 82

⁵³ NAS Report, pp. 8, 96, 172

⁵⁴ Correspondence and attachments from Dr. Catherine Woteki to DNR Director Jeff Vonk dated November 14, 2003; attachment dated October 27, 2003

and was not originally established to meet the statutory requirements. We support the hydrogen sulfide minimal risk levels specified in House File 2523 and by ATSDR as being protective of public health. House File 2523 provides greater public health protection by allowing for a 30 times safety factor which current law does not accommodate.

We also continue to have concerns with the monitor locations. Iowa Farm Bureau has repeatedly raised this issue since the June 2002 technical advisory group meetings, but the department has not moved the monitors. Over a year ago, Director Vonk committed to our elected president and the undersigned that the monitors would be placed at separated locations.⁵⁵ Today, the monitors are still not located at separated locations and the proposed rule still does not require them to be placed at separated locations. It is important to learn whether there are concentrations that could cause adverse health effects at people's homes, not up to 984 feet away from a home. The monitor siting requirements in House File 2523 provide greater flexibility to the department than current law by allowing monitors to be located up to 300 feet away from a residence. Current law requires monitors to be located at separated locations. We are encouraged that the department has indicated it will move these monitors to separated locations. We urge the department to do so as soon as possible.

Clouding this entire process is an issue raised by many of our members about the constitutionality of only applying the "health effect value" and "health effect standard" to animal feeding operations. Iowa has many other sources of hydrogen sulfide, some of which may have higher emission rates and exposures to neighboring populations than animal feeding operations. The statute and the proposed regulation may very well be a violation of the equal protection clause and unconstitutional.

We appreciate the professionalism of the DNR staff that moderated the public hearings. They were at several long evenings listening to the concerns of many Iowa citizens about the proposed regulations. We also appreciate the department holding a second hearing in Mason City to accommodate those citizens who were not allowed to speak at the first Mason City hearing. We welcome the opportunity to discuss our comments with DNR staff in the near future.

Sincerely,



Christina L. Gruenhagen
Public Affairs Counsel

⁵⁵ Meeting held at the Wallace Building on March 19, 2003.

DNR
04/05/04

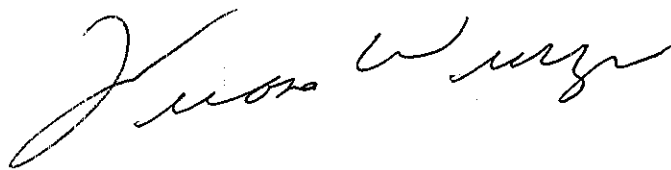
My name is Duane Wurzer. I live on a small farrow to finish hog farm in Chickasaw County. I have raised hogs on this farm for 35 years. I have 120 sows and my family and I do all the work on the farm.

The farm just south of me was sold. Within six months time of the sale a corporate owned, 4,000 head hog finisher was built a quarter mile south of my home. When the wind blows from the south the stink from the CAFO is so bad that I can't even smell my own hogs. I know what hog manure smells like, and it does not bother me or my family. The smell that comes from these buildings does not smell like hog manure. The stink is making us sick.

Before the matrix was implemented, 99% of the CAFO's were constructed. Many more were built before HF519, so vast numbers of the CAFO's were built anyplace so that the owners or investors did not have to smell or live by them. If these CAFO's are to be grandfathered in they should be under strict air quality rules.

I support 15 parts per billion.

Thank you for your time,
Duane Wurzer



RECEIVED
APR 08 2004

Duane & JoAnn Wurzer
2971 220th St.
Lawler, IA 52154
563-238-5571



Iowa
Cattlemen's
Association

April 7, 2004

Mr. Bryan Button
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

Dear Mr. Button:

The Iowa Cattlemen's Association, representing 10,300 cattle producers across the state, wishes to provide comments to the proposed administrative rules on air quality.

The Iowa Cattlemen's Association members believe that the numbers proposed for a health effects value and a health effect standard do not represent sound science. The standard of 15 parts per billion (ppb) of hydrogen sulfide for one hour is not considered harmful by the Centers for Disease Control, and we believe will place an undue burden on Iowa's livestock producers without providing a health benefit to Iowans.

Currently, there is no health risk data on which to propose the standard of 15 ppb of hydrogen sulfide for one hour exposure. The ATSDR, a group within the Centers for Disease Control, has set the level for human health effects at 70 ppb. We feel this is a number supported by sound science, and believe the DNR should change its recommendation to this number.

In addition, we would like clarification that in the future, all DNR monitoring will be done at separated locations from feeding facilities rather than at the fence line of the property. We would also like the rules to state that whatever the rule determines as the number believed to cause an adverse health effect, that mandates for controls for operations only be placed on particular operations that can be shown to be the source of the offending pollutants. It has come to our attention that DNR believes it could regulate all producers of a similar facility if a violation were found at only one facility of that type. We disagree with this interpretation.

Air quality is an important issue to our producers, since, as cattle producers, we live at our feedlot locations. Most producers work hard at being good neighbors and reducing pollutants as much as possible. However, if the DNR insists on enforcing unreasonable standards that are based on a prejudice against the livestock industry rather than sound science, we have no choice but to argue against these rules. We believe the state of Iowa needs the economic impact created by its livestock industry. Regulations must represent true measures of real health risks, not simply a number where violations can be enforced and operations shut down.

Thank you for the opportunity to comment on these rules.

Bob Johnson

Sincerely,
Bob Johnson, President
Iowa Cattlemen's Association

Mr. Bryan Bunton
 Iowa Department of Natural Resources
 Air Quality Bureau
 7900 Hickman Road, Suite 1
 Urbandale, IA 50322

Dear Mr. Bunton:

These comments are in response to the Iowa Department of Natural Resources proposed administrative rules set forth in item ARC 3092B as published in the Iowa Administrative Bulletin on January 7, 2004. They are provided on behalf of the Iowa Pork Producers Association (IPPA).

The basis for DNR regulations on air quality was clearly set forth in Senate File 2293 and signed into law in 2002. The basic framework established in that bill called for the IDNR to:

*Conduct a comprehensive field study to monitor the level of air borne pollutants emitted from animal feeding operations in this state, including but not limited to each type of confinement feeding operation structure.

****If*** the study found baseline data which demonstrated to a reasonable degree of scientific certainty that airborne pollutants emitted by an animal feeding operations are present at a separated location at levels commonly known to cause a material and verifiable adverse health effect, ***then*** IDNR could develop plans and programs for the abatement, control and prevention of airborne pollutants originating from animal feeding operations.

*The measurements were to be taken at "separated locations" (i.e. locations for which a separation distance applied) and any standards developed were to be based on and enforced at distances measured to a separated location.

As previously noted, Iowa Code section 459.207 requires the threshold to be: **"commonly known to cause a material and verifiable adverse health effect."** The proposed 15 ppb health effects standard (HES)(daily maximum one-hour average not to be exceeded more than 7 times per year) does not meet this standard established by the Iowa Legislature.

As with prior rulemaking, the department is relying on the report issued by the University of Iowa and Iowa State University in February 2002. The Report, which was based on a review of existing information and not the objective collection of Iowa data, included a recommendation of 15 ppb at a residence or public use area. Since the Report was released, the department's monitoring data has shown that two key assumptions in the Report were incorrect. First, it was stated on page 8 of the Report that *"The U.S. EPA has determined that simultaneous exposure of two substances such as hydrogen sulfide and ammonia (both pulmonary irritants) results in an additive effect. Thus, in order to protect against the adverse effects of such binary mixtures the exposure limit for each should be reduced accordingly."* Currently available monitoring data for animal feeding operations shows that hydrogen sulfide and ammonia do not occur simultaneously and therefore it is inappropriate to reduce the level for hydrogen sulfide by 50%. Secondly, it was also stated on page 8 of the Report that *"While emissions*

from CAFOs fluctuate over time, they produce chronic rather than acute exposures. Rather than representing single doses, these exposures are recurring and may persist for days with each episode.” Currently available monitoring data shows that hydrogen sulfide exposures from animal feeding operations occur over the short-term (acute) and not long-term (chronic). Thus, it is inappropriate to use the ATSDR based long-term exposure level of 30 ppb for short-term exposures.

The placement of monitors to collect data is another problematic area. While the department in this proposed rule now agrees with the Iowa Code which requires placement monitors at separated locations, the department’s placement criteria as set forth in Subpart I of its proposed “Iowa Ambient Air Sampling Manual” would permit the placement of a monitor up to 300 meters (approximately 900 feet) away from separated locations. The placement could be in any direction which means it could be approximately 900 feet closer to an animal facility than the separation distance required for the facility. This clearly conflicts with Iowa Code section 459.207

Another area of concern is that the sampling manual does not prohibit the use of data above/below the proposed HEV but within the department’s accuracy margin of error (+/- 20%). This means a reading of 16 ppb might, in reality, be as low as 12-13 ppb. Thus a violation of the value/standard could be counted when in fact it had not occurred.

In the Air Sampling Manual the department is also proposing the following methodology for calculating Valid Monitoring Days:

“At a given monitoring site, a day of continuous monitoring data is valid if: at least 75 percent (%) (18 hours) of valid hourly averages have been recorded, or fewer than 18 valid hourly averages have been recorded, but the maximum hourly average of the available data exceeds 15 ppb. (i.e., a maximum hourly average of 16 ppb or greater).” (underline emphasis added)

However, any day for which there is less than 18 hours of valid hourly averages should not be used as a valid monitoring day. Accordingly, the portion of the department’s proposal allowing for less than an 18-hour valid sampling day must be stricken.

Finally, the department is also proposing in the Iowa Ambient Air Sampling Manual that “The HES represents the trigger level for the development of plans and programs to mitigate emissions from animal feeding operations.” Apparently, DNR is proposing that if the field study shows the HES is exceeded, plans and programs would be developed requiring all animal feeding operations in Iowa to implement practices to “mitigate emissions.” However, this approach does not meet Iowa Code section 459.207”3”b” which provides that in enforcing air quality standards, the department shall take all initial measurements at the separated location and if a violation exists, conduct an investigation to trace the source of the airborne pollutant. Clearly, the Iowa Legislature intended that enforcement of air quality standards occur only after it has been determined that a violation has occurred at the specific operation. The department has no authority under Iowa Code section 459.207 to “enforce” air quality standards by extrapolating readings from one operation to another.

Thank you for the opportunity to provide these comments.

Sincerely,

Sam Carney
President
Iowa Pork Producers Association

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

Dear Mr. Bunton:

These comments are in response to the Iowa Department of Natural Resources proposed administrative rules set forth in item ARC 3092B as published in the Iowa Administrative Bulletin on January 7, 2004. They are provided on behalf of the Iowa Corn Growers Association (ICGA).

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Thank you for the opportunity to provide these comments.

Sincerely,

David Sieck
President
Iowa Corn Growers Association

Comments on proposed Hydrogen Sulfide standard

I am writing as a member of the Iowa Sierra Club to express support for the proposed one-hour average hydrogen sulfide standard of 15 ppb from factory farms. We believe that this standard, as recommended by the joint university study, is based on the most current and objective science, "sound science" as non-scientists have taken to calling it, and that this standard is a good first step that Iowa needs to take in order to protect public health in rural communities.

We've all heard the arguments for protecting polluters and ignoring the health threat that unregulated hydrogen sulfide emissions pose – we've all been subject to fear mongering in the form of threats that the sky is falling, that the slightest move towards holding these industrial facilities responsible for their impacts on rural communities will "run agriculture out of Iowa." Anyone with the audacity and utter contempt for Iowa's rural citizens to say that the proposed hydrogen sulfide standard would run agriculture out of Iowa needs a reality check. So does anyone who believes them.

This standard would allow 7 exceedences every year with no fines or other consequences and would exist primarily as a benchmark for monitoring efforts. Monitors would be focused on the state's largest facilities, rather than family farmers whose farms would not exceed the standard anyways. The opponents of air quality protections are terrified of anyone having the ability to quantify how serious our CAFO emissions problems are, because they know it is agribusiness, not agriculture – animal factories, not family farms – that will be impacted if Iowa begins taking this public health threat seriously. Those who threaten we will run agribusiness out of the state are fully aware that states do not come much more agribusiness-friendly than Iowa – livestock production isn't going anywhere, so we need to make it take a form that Iowans can live with.

Now we're hearing that the Joint University study isn't based on "sound science." I have to ask – what exactly is "sound" science, if it isn't the most current, consensus based, research based, peer-reviewed science available? Apparently, sound science is limited to whatever the industry wants to hear. This is nothing new. This industry has demonstrated time and time again that it will fight *any* regulation, whether it is intended to protect public health, the environment, or the free market. Last year the air quality rules were too broad, this year we hear they're too narrow. Sound science has never been the industry's bottom line – profit is their bottom line. And profits go up when costs – like air pollution – are externalized. These businesses are in the business of making money and do not care about the soundness of the science behind the joint university study or any of the many other studies showing the harmful effects of hydrogen sulfide, ammonia or odors. And unfortunately, many of these "farmers" have shown the same contempt for their neighbors' health and quality of life as they have for mounting scientific evidence. That contempt is why this issue has become so controversial and divisive in Iowa.

Animal factory operators want to be treated like farmers – they want massive subsidies and exemption from regulations not needed for traditional farms, and they wish to be grand-fathered into the culture of respect that traditional family farming has fostered –

the respect accorded to farmers who are good neighbors, good stewards of the land, and active members of and contributors to their communities. But these largest livestock confinements are not farms – they're industrial facilities that produce industrial waste and toxic air emissions, they all too often are not good neighbors or good stewards of the land, and they deserve to be regulated, just as other industrial polluters are.

There is no reason to back off from the recommendations of the Joint University study, which include setting standards for ammonia and odors as well as hydrogen sulfide. Please move ahead with these air quality rules to monitor Iowa's largest livestock confinements. It is clear that when an industry amasses the influence to pressure a University into condemning its own research and the legislature into attempting to strip the DNR of its rightful authority to set protective standards, that we have allowed that industry too much self-regulation. Rural Iowans support the standard DNR has proposed – please don't be swayed from good judgment and good science to accommodate an industry that constitutes a very vocal minority used to getting its way, and that doesn't want to share the countryside with citizens who have far more than profit to lose.

Please consider this an official comment.

Sincerely,
Tarah Heinzen
Sierra Club Conservation Organizer

From: "Phillip & Carol Hemesath" <hemesath@acegroup.cc>
To: <bryan.bunton@dnr.state.ia.us>
Date: 4/9/04 7:10AM
Subject: air quality

Dear Mr. Bunton,

I am commenting on the 15ppb Hydrogen Sulfide level that is being proposed for the Air Quality Rule

It is obviously too restrictive in light of recent information from national agencies such as ASTDA, OSHA, NIOSH, AIHA, AGCIH and NAS whose standards are set at 70ppb and above. There is no scientific support for such the 15ppb standard. It sends the wrong message to the public sector and is indefensible in regard to detrimental impacts on the health of individuals at the present separation distances.

The Iowa legislature negated this standard last year and now your agency brings it back. Why?

I support clean air, as we all do, but, please, let's do it responsibly. There is no crisis here. There is time to do a sound, comprehensive, accurate study before we charge ahead and do something detrimental to our vital livestock industry to satisfy a small group of malcontents.

Sincerely,

Phil Hemesath
2226 155th St.
Calmar, Ia 52132

Insist on local control

By TOM KENNISON
Orchard

On March 4, the Globe Gazette published comments made at the Department of Natural Resources hearing on hydrogen sulfide emission standards at the Mason City Public Library on March 3

Todd Stowater, an Algona attorney and district director of the Iowa Cattleman's Association, was quoted as saying, "It's an effort to take everybody prisoner." "The rule is an attempt to drive livestock producers out of Iowa." "The producers don't have a problem with reasonable rules." Lastly, this is an effort for neighbors to "run over producers."

If the judge is a corporate producer and the jury displays an "owned by Farm Bureau smile" on their face, you might enter these facts in a court of law and win. If the 85 percent plus of the second-, third- and fourth-generation pork producers who no longer are in the business testify, you will find who is taking who prisoner, who drove them out of business, and whether they quit because their neighbors ran over them as producers.

Realize that Farm Bureau and the absentee pork producers don't want any regulation; it will have to be imposed on them as on any other industry. They don't have a place at a negotiating table. Their actions indicate that they as a group are willing to subsidize their corporate buddies and peers with this

state's air and water (oops, sorry about that).

Todd conveyed the group's message well when he said, "If they (meaning the neighbors) don't like it, they should move."

Time to wake up and get this behind us. Support the DNR and Gov. Vilsack, on this issue. Insist on local control with publicly announced public hearings.

I have enclosed a copy of an article which I placed in the Mason City Globe Gazette on March 12.

I encourage Governor Vilsack and the DNR to continue in the direction that they are attempting to go. The livestock industry in Iowa needs protection from it's self, which they understandably will not administrate. It has to be imposed. The independent producer is drawing his last breath, while blindly defending the cause of his problem. Thank You

Tom Kennison

Tom Kennison

2605 110th St.

Orchard Ia

50460

tkennison@omnitelcom.com

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APR 09 2004

April 2, 2004

RE: Proposed Rules


Mr. Bryan Bunton
Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

Dear Mr. Bunton,

I am involved in a family livestock operation in Cerro Gordo County. I am strongly **opposed** to the proposed rules for health effects value and health effects standard for animal feeding operations. I believe the proposed measurement of 15 ppb of hydrogen sulfide is far too restrictive as it is based on a very controversial study. We are also concerned about air quality for us and neighboring residents but feel the standard at a neighboring residence should be at least 70 ppb or higher for hydrogen sulfide allowed for at least 14 days.

Thank you for your consideration.

Sincerely,



Clay Weaver

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APR 09 2004

April 2, 2004

RE: Proposed Rules

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Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

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Thank you for your consideration.

Sincerely,



Tom Weaver

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APR 09 2004

April 2, 2004

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Mr. Bryan Bunton
Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

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Thank you for your consideration.

Sincerely,



Cory Weaver

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APR 09 2004

April 6, 2004

RE: Proposed Rules

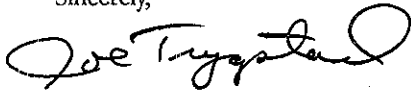
Mr. Bryan Bunton
Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

Dear Mr. Bunton,

I work as a Pork Production Specialist for Land O'Lakes Feed. I travel an eight county area in north central Iowa calling on several small and large swine operations. I believe all producers that I work with do a very good job showing concern for the health and well being of their neighbors. I am strongly **opposed** to the proposed rules for health effects value and health effects standard for animal feeding operations. I believe the proposed measurement of 15 ppb of hydrogen sulfide is far too restrictive as it is based on a study that many instructors and professors at ISU find to be controversial. I believe the measurement for a neighboring residence should be at least 70 ppb or higher for hydrogen sulfide allowed for at least 14 days.

Thank you for your consideration.

Sincerely,


Joe Trygstad

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APR 08 2004



**Iowa Poultry
ASSOCIATION**

April 8, 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

Dear Mr. Bunton:

These comments are in response to the Iowa Department of Natural Resources proposed administrative rules set forth in item ARC 3092B as published in the Iowa Administrative Bulletin on January 7, 2004. They are provided on behalf of the Iowa Poultry Association (IPA). IPA is a voluntary statewide trade association representing competing firms involved in all aspects of poultry and egg production in Iowa.

In our view, the mechanism for determining the need for regulations like the current proposal was clearly set forth in Senate File 2293 as signed into Iowa in 2002. The basic framework established in that bill called for the IDNR to:

1. Conduct a comprehensive field study to monitor the level of air borne pollutants emitted from animal feeding operations in Iowa, including but not limited to each type of confinement feeding operation structure.
2. **If** the study found baseline data which demonstrated to a reasonable degree of scientific certainty that airborne pollutants emitted by an animal feeding operation were present at a separated location at levels commonly known to cause a material and verifiable adverse health effect, **then** IDNR could develop plans and programs for the abatement, control and prevention of airborne pollutants originating from animal feeding operations.
3. The measurements were to be taken at "separated locations" (i.e. locations for which a separation distance existed, like a home or church) and any standards developed were to be based on and enforced at distances measured to a separated location (i.e. **not** at the CAFO property line).

Unfortunately, in response, IDNR instead chose to:

1. Put monitors at CAFO Property lines or closer than separated location distances.
2. Propose an "ambient air quality standard" of 150 ppb for ammonia and 15 ppb for hydrogen sulfide as part of a rule which would have been enforceable December 1, 2004.



8515 Douglas Avenue, Suite 9
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Tel. 515.727.4701
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www.iowapoultry.com

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APR 09 2004

Mr. Bryan Bunton
Iowa Department of Natural Resources
April 8, 2004
Page 2

Both of these actions were in direct conflict with the Iowa law established in SF 2293 and resulted in the Iowa legislature appropriately vetoing these rules during the 2003 legislative session.

Now the Department proposes a new "Health Effects Standard" and "Health Effects Value" of 15 parts-per-billion (ppb) for a one-hour time weighted average as measured near a "separated location". In doing so, the department holds this level out to be the following:

1. A level commonly known to cause material and verifiable adverse health effects,
2. A level at which the department would initiate plans and programs to mitigate emissions, and,
3. Based on commonly known and accepted health risk data.

As with the prior rulemaking, the department is relying on the report issued by the University of Iowa and Iowa State University in response to questions asked by Governor Vilsack and Director Vonk. The report, which was based on a review of existing information and not the objective collection of Iowa data, included a recommendation of 15 ppb at a residence or public use area.

However, this recommendation was based on at least two flawed assumptions which the department's own monitoring show to be incorrect. The first flawed assumption is that the compounds were present together at equal concentrations at all times. The second is they were present at all times. Current monitoring data shows this to not be the case.

The placement of monitors to collect data is another problematic area. The department, we believe, now finally agrees with the clearly stated legislative intent which called for their placement at separated locations. The result has been the inefficient expenditure of Iowa tax payer's dollars in times when budgets are extremely tight. Such actions by the department call in to question its analysis of the methods needed to deal with the health of Iowans and their ability to efficiently utilize Iowan's tax dollars.

Unfortunately, the department has, again, clearly failed to meet the criteria set forth by the legislature in Iowa law in proposing this rule. The department's placement criteria as set forth in Subpart I of its proposed "Iowa Ambient Air Sampling Manual" would permit the placement of a monitor up to 300 meters (approximately 900 feet) away from separated locations. The placement could be in any direction which means it could be

Mr. Bryan Bunton
Iowa Department of Natural Resources
April 8, 2004
Page 3

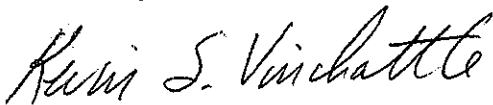
approximately 900 feet closer to an animal facility than the separation distance required for the facility. Again, an item which clearly flies in the face of Iowa law.

The sampling manual does not prohibit the use of data above/below the proposed HEV but within the department's accuracy margin of error (+/- 20%). This means a reading of 16 ppb might, in reality, be as low as 12-13 ppb. Thus a violation of the value/standard could be counted when in fact it had not occurred.

In the final analysis of this rule, it is clear the department has, again, failed to fulfill the mission created by the Iowa legislature in Iowa law. The department should rescind the current rulemaking and call for the Governor's signature on House File 2523.

Thank you for the opportunity to provide these comments. Please feel free to contact me if you wish to discuss anything.

Sincerely,



Kevin S. Vinchattle
Chief Executive Officer

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APR 09 2004



April 8, 2004

VIA EMAIL, FAX [(515) 242-5094] AND U.S. MAIL

Mr. Bryan Bunton
DNR Air Quality Bureau
7900 Hickman Road
Suite 1
Urbandale, IA 50322

Re: Proposed Health Effects Standard for Hydrogen Sulfide

Dear Mr. Bunton:

I am writing on behalf of Golden Oval Eggs to provide comments on the Notice of Intended Action of the Environmental Protection Commission (EPC) to establish by rule a Health Effects Standard (HES) of 15 parts per billion (ppb), daily maximum one-hour average, for hydrogen sulfide at a separated location from an animal feeding operation.

Golden Oval Eggs is a farmer-owned, value-added cooperative that produces eggs and egg products. We have facilities in Renville, Minnesota and Thompson, Iowa that produce a total of over 1.3 billion eggs per year. Our cooperative has over 400 members in Minnesota, and nearly 300 Iowa members. We also take our commitment to environmental protection very seriously.

Golden Oval is familiar with standards for hydrogen sulfide because Minnesota has had an ambient hydrogen sulfide standard measured at the property line in effect for many years. In addition, Minnesota recently established a Health Risk Value (HRV) for hydrogen sulfide through a rule making process.

We have reviewed the final report of the Iowa State University and University of Iowa study group entitled "Iowa Concentrated Animal Feeding Operations Air Quality Study" (Study), as well as the EPC's Notice, and have the following comments:

- 1. Measurement at Separated Locations.** Golden Oval supports the Commission's proposal that the standard should be measured only at separated locations, rather than at the property line. Measurement at the property line does not provide a good indication of potential health impacts on residences or public use areas. However, community-based monitoring also makes it harder to determine the specific source of the air pollution in agricultural areas where many potential sources are present. We request that the rule be modified to include a method for determining the source or sources of exceedences of the standard.

Operations Office:

1800 Park Avenue East, P.O. Box 615
Renville, Minnesota 56284
320-329-3341
320-329-3276 (fax)
Website: www.goldenovaleggs.com

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APR 12 2004

A Division of Midwest Investors

2. **Proposed HES.** Golden Oval is very concerned that the proposed HES of 15 ppb, measured on a daily maximum one-hour average, is more restrictive than those adopted by other states, such as Minnesota. Although Minnesota did not establish an acute HRV for hydrogen sulfide, measured on a maximum daily one-hour average, it did establish a subchronic HRV of 10 ppb, measured on a 13-week average. In addition, Minnesota has established an ambient standard, measured at the property line, based on a half-hour average, of 50 ppb, not to be exceeded over two times per year, and 30 ppb, not to be exceeded more than twice in five consecutive days. Minnesota's ambient standard, measured on a *half-hour* average, is at least twice the proposed EPC standard measured on an *hourly* average. The HRV, measured on a *13-week* average is only five ppb less than the proposed HES, measured on an *hourly* average. We believe the proposed HES, which was derived from the Study, lacks good scientific support. This lack of good science has led to an artificially low standard.

Iowa's lack of consistency with standards with other states will create confusion and will negatively affect the state's agricultural business climate. Therefore, we also request that the proposed hydrogen sulfide standard be reevaluated to be more consistent with standards in other states.

4. **Proposed Seven-Day Exceedance Exception.** Golden Oval also sees a significant problem with the limitation of exceedance exceptions to only seven days per year. In Minnesota, under Minn. Stat. §116.0713, livestock production facilities are exempt from state ambient air quality standards while manure is being removed, and for seven days after manure is removed from barns or manure storage facilities. Production facilities having greater than 300 animal units are limited to 21 calendar days for the removal process, and the facility must first notify the state prior to removal. The Minnesota approach is much more acceptable to Golden Oval because it allows for a realistic time period for manure removal. Golden Oval's manure removal process can take anywhere from 10 to 21 calendar days. It cannot be done within the seven days proposed by the EPC. Therefore, we would request that the EPC strongly consider adopting an exceedance exception approach similar to that adopted in Minnesota.

Thank you for this opportunity to provide our comments on this important matter. If you have any questions, please contact me at 320-329-8182.

Sincerely,



Dana Persson
CEO

cc: Kevin Johnson, Lindquist & Vennum

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APR 12 2004