



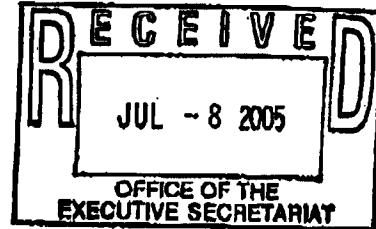
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United States Department of Agriculture

Office of the Secretary
Washington, D.C. 20260

JUL - 7 2005

The Honorable Stephen L. Johnson
Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20520



Dear Mr. Johnson:

Agriculture is committed to protecting the health of all families, workers, and communities by complying with standards that are appropriate and necessary. However, issues addressed in the Environmental Protection Agency's (EPA) second draft Staff Paper on Particulate Matter have serious implications for agriculture. The Department of Agriculture is concerned that a coarse Particulate Matter standard might be issued in the absence of sound science and will result in ineffective, unfair, and unnecessary controls.

At my request, the Agricultural Air Quality Task Force (AAQTF) has carefully reviewed the relevant EPA documents and strongly recommends that the proposed PM_{10-2.5} standard not be promulgated unless and until sufficient research findings justify a standard. In addition, the AAQTF recommends that EPA address the sampler bias issues associated with ambient concentration measurements using Federal Reference Method samplers and that National Ambient Air Quality Standards should not be used as a "concentration not to be exceeded" at the property line for permitting and enforcement of PM emissions from agricultural sources. I fully support the recommendations of the AAQTF. The recommendations and supporting details are outlined in the enclosed document.

Again, let me reiterate that agriculture is committed to protecting the health of all families, workers, and communities by complying with standards that are appropriate and necessary. However, the standards must be based on sound science in order to be effective and fair. Should you wish further information on these recommendations, please do not hesitate to contact me.

Sincerely,

Mike Johanns
Secretary

Enclosure