



October 19, 2021

To: Environmental Protection Commission Members

CC: Matthew Johnson, DNR

From: Nicole Crain, Executive Vice President  
Brad Hartkopf, Director, Public Policy

RE: Item 12 - State Implementation Plan Revision for Sulfur Dioxide in Muscatine

On behalf of the Iowa Association of Business and Industry (ABI), we write in support of agenda item 12, regarding the approval of the State Implementation Plan (SIP) for SO<sub>2</sub> in Muscatine. ABI represents approximately 1,500 member companies who employ 330,000 hardworking Iowans. Thank you for the opportunity to comment and for your service to the state.

Almost half of ABI's membership is comprised of manufacturers. Those companies are critical to the products people all over the world use in their everyday lives and consume in food. ABI members work hard to protect their employees and the citizens of the state by implementing safeguards to protect the environment. ABI appreciates the work of DNR and industry in Muscatine to ensure attainment for SO<sub>2</sub> and we support the recommendation of DNR to move forward with approval of the SIP. The approval is good for the economy and Iowa's position as a manufacturing leader, but more importantly is based on sound science and data to protect Iowans. Specifically:

1. Substantial actual reductions occurred in the Muscatine area with the shutdown of SO<sub>2</sub> emitting units at Grain Processing.
2. These reductions are demonstrated in the actual monitoring data which shows substantial and real reductions
3. The reductions are permanent and the Department's plan assures that the reductions and attainment status will be maintained.
4. Comments from certain groups raise issues related to the Department's approach to permitting of SO<sub>2</sub> sources. However, the Department is using conservative assumptions in its permitting decisions which are intended to maintain the attainment status in accordance with Iowa's permitting rules and requirements. These conservative permitting approaches are reflected in the monitoring data.

In summary, the actual data shows the substantial improvement in Muscatine air quality. The Department's plan is designed to maintain this improved air quality and should be approved. We respectfully request your support of Item 12.