



April 30, 2020

Alyssa Fizel
Environmental Specialist
Iowa Department of Natural Resources
502 E 9th St
Des Moines, IA 50319

Dear Ms. Fizel:

Thank you very much for the opportunity to comment on the Department of Natural Resources Air Quality Bureau proposal for updating dispersion modeling guidance. The Iowa Association of Business and Industry (ABI) represents 1,500 members companies from all corners of the state. ABI members represent industries from insurance and banking to manufacturing and construction. With a diverse range of members, ABI has a vested interest in the policies that the Department and Bureau implement.

As way of background, ABI and a diverse group of members in 2014-2015 spent months reviewing and providing recommendations regarding the modeling policies of the Bureau and how they differentiated from the federal requirements. As a result of those meetings some progress was made in the Department's approach to modeling. We have continued to monitor and receive feedback from ABI members since this time about areas for improvement for industry.

We appreciate DNR's statement in the initial release that EPA's and DNR's modeling guidance will align and therefore not result in new or increased modeling requirements for Iowa industry. Historically that has not always been the case and we are supportive of this change.

Second, we respectfully request that DNR not initiate modeling without first discussing the determination to require modeling with the facility and providing them with an opportunity to respond.

Finally, we suggest that the guidance be changed to say the MD form is no longer required by industry but DNR may use this to determine if modeling is required. An applicant can choose to submit this form to ensure information is accurately captured.

ABI members are required to comply with numerous state and federal statutes, regulations, policies and guidance and the recommended changes to the guidance and Iowa following EPA's guidelines will help industry operate in a more predictable and sound manner.



*Iowa Association of
Business and Industry*

ABI staff and members have a valuable, working relationship with the Department and the Bureau. We appreciate the opportunity to provide feedback on issues that affect Iowa's business climate. Thank you for the opportunity to comment.

Regards,

A handwritten signature in black ink that reads 'Brad Hartkopf'. The signature is written in a cursive, slightly slanted style.

Brad Hartkopf