



May 2, 2020

Via email to: bhartkopf@iowaabi.org

Brad Hartkopf
Director, Public Policy
ABI
400 E Court Ave, Ste 100
Des Moines, IA 50309

RE: Response to ABI's Comments Concerning the *Five-year Air Monitoring Network Assessment*

Dear Mr. Hartkopf:

Thank you for your letter of April 28, 2020, commenting on the Department's *Five-year Air Monitoring Network Assessment* on behalf of the Iowa Association of Business and Industry (ABI).

We appreciate and share your belief that the placement of monitors in the network should result in an accurate and objective picture of the State as a whole. In particular, you indicate "If there is state interest in an emitter where monitoring data is necessary, then do not factor it in to overall state levels of emissions, as it would likely unfairly weight the average." We agree that near source monitors should be excluded when averaging over the network to calculate a state-wide background.

You encourage us to continue to carefully evaluate the need to replace monitors and eliminate them if they are unnecessary. Consistent with this goal, and as we indicated in our assessment, over the next five years we will propose to discontinue some SO₂ monitors at locations where industrial facilities have made a permanent switch from coal to natural gas and sulfur dioxide levels have fallen.

You suggest that we "potentially request proposals from private companies to see if the costs of monitoring can be reduced as a means of encouraging efficiencies". The ambient monitoring program has made significant cuts in recent years, and while we appreciate this suggestion to seek outside help to generate additional cost-savings, we will not adopt it at this time.

You also indicate that it is your belief that "funding for air monitoring should come from the State of Iowa General fund and not from the business community at large". In Iowa, ambient air monitoring is funded through a mix of sources, including Title V fees, EPA grants, State "Environment First" and State General fund appropriations. We appreciate your desire to lower fees for the business community, and encourage ABI's continued involvement in our budgeting process.

We hope we have provided adequate answers to ABI's questions. The Department does not intend to modify the Assessment based on ABI's comments.

Sincerely,

Sean Fitzsimmons
Lead Worker, Ambient Air Monitoring Group
Air Quality Bureau, Iowa Department of Natural Resources

Cc: Jim McGraw, Brian Hutchins, Catharine Fitzsimmons