

Comments Provided for Consideration to the SAB Animal Feeding Operations Emission Review Panel for the March 14-16, 2012 Meeting that will Review EPA's February 2012 draft reports: a) Development of Emissions Estimating Methodologies for Broiler Animal Feeding Operations; and b) Development of Emissions Estimating Methodologies for Lagoons and Basins at Swine and Dairy Animal Feeding Operations

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I support EPA's efforts to select the very best scientists and engineers for this Science Advisory Board (SAB). Individuals who work and support families with income derived from Animal Feeding Operations are impacted by EPA enforcement actions. The goal of any enforcement action should be that it is justified based upon protecting public health and welfare. Enforcement actions by State Air Pollution Regulatory Agencies (SAPRAs) and EPA must be warranted and based upon sound science. No one wants to see another "Buckeye Egg" where EPA used emissions data that were incorrect to force a company to spend more than \$1.4 M. The EPA justification for that the enforcement action was that Buckeye did not have Title v permits. This conclusion was based upon flawed PM concentrations measurements, ventilation fan assumptions, and calculations of annual emission rates of PM. Ideally, the Board's work will result in more accurate emission factors for CAFOs that will help but if the regulators assume that the flow rates of fans used in laying hen operations do not change with ambient temperature, inappropriate regulatory actions can and will result. The regulation of emissions of air pollutants from agricultural operations (cattle feeding, dairies, swine, and poultry) is dependent upon accurate emissions factors. Emission factors are derived from accurate emissions data. The panel's work must include the protocol for deriving accurate emission factors from accurate emissions data. Regulating air pollution emitted by agricultural operations is and will continue to be significantly impacted by EPA. It is my sincere hope that the work-product of this Board will be based upon sound science and will prevent inappropriate regulation of Animal Feeding Operations.