



# Texas Cattle Feeders Association

5501 I-40 W. • Amarillo, TX 79106-4617  
(806) 358-3681 • (806) 352-6026  
www.tcfa.org • info@tcfa.org

---

## Dust Talking Points

- In 2006, EPA set a coarse PM (i.e. dust) National Ambient Air Quality Standard (NAAQS) of  $150\mu\text{g}/\text{m}^3$ .
- EPA used the “precautionary principle” to set the standard since the science was inconclusive.
- Rural dust is nothing more than dust kicked up by cars or trucks travelling on dirt roads or a tractor tilling a field, and has long been considered to be of no health concern at ambient levels.
- Under the Clean Air Act, EPA is required to review the dust NAAQS every 5 years.
- EPA is in the process of that next review of the dust NAAQS.
- This time around, EPA has laid the foundation to impose the most stringent regulation of dust in US history.
- The EPA is preparing to propose to regulate dust at a level that is twice as stringent as the current standard!
- The current standard is  $150\mu\text{g}/\text{m}^3$  with a 99<sup>th</sup> percentile form (which allows only one violation per year to still remain in compliance).
- EPA is expected to propose tightening the standard to  $65\text{-}85\mu\text{g}/\text{m}^3$  with a 98<sup>th</sup> percentile form (which allows 7 violations per year to remain in compliance).
- EPA claims these two standards are essentially “equivalent” for health protection.
- So why do it? EPA wants to change to the 98<sup>th</sup> percentile form in an effort to stop from having to take into consideration “spikes” in emissions that put areas into non-attainment if violations occur.
- That’s fine if you live in an urban, essentially dust free, area of the country. But if you live in rural America and produce food for a living it’s not fine. Food production requires tilling soil, harvesting crops, livestock rearing, and traveling on dirt roads, all of which emit dust.
- Dust regulation at a level that is twice as stringent as the current standard would require the designation of many more non-attainment areas than currently exist, and would be economically devastating for agricultural and other resource-based operations in this state.
- We ask you to consider signing onto a Dear Colleague letter currently being circulated by Representatives Noem and Fincher expressing opposition to revising the dust standard.