



Agribusiness Association of Iowa

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June 4, 2014

Environmental Protection Commission
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324

Re: Rulemaking for Grain Vacuuming at Grain Elevators

Dear Environmental Protection Commission:

Thank you for this opportunity to comment on the proposed rulemaking to amend Chapter 22 of Iowa Code section 455B.133 to establish best management practices (BMPs) for grain vacuuming operations at small grain elevators in Iowa.

On behalf of the Agribusiness Association of Iowa (AAI), which consists of over 1,100 business locations across the state that supply feed, seed, crop protection chemicals, grain, fertilizer, equipment and additional products and services that benefit agriculture, we are writing to express our **strong support** for the adoption of these proposed Grain Vac BMPs.

AAI's members are committed to protecting the environment through reasonable operational improvements that benefit and protect the communities that we work and live in. We commend the Iowa Department of Natural Resources for convening the Grain Vac Workgroup in 2011 that led to these rules being proposed.

By including AAI members that are employed by grain elevators and grain vac manufacturers and representatives from the Iowa Department of Agriculture and Land Stewardship, the work group has created BMPs that are practical activities that owners and operators may use at grain elevators to minimize dust and possible air quality impacts in our state's communities. We urge you to adopt these amendments as written.

We thank you for providing the opportunity to comment on this important rulemaking.

Sincerely,

Joel Brinkmeyer, CEO
Agribusiness Association of Iowa

Tracy Gathman, Grain Committee Chair
Agribusiness Association of Iowa