Data Submitted (UTC 11): 1/3/2018 12:00:00 AM
First name: Anonymous
Last name: Anonymous
Organization:
Title:
Comments: EPA emission inventory for many industrials, companies, and agricultural operations greatly overestimated the emissions and made American companies the prime target. Example of Agricultural bad science and probably the most blatant example of an inaccurate inventory, which would have cost the agricultural industry thousands of dollars, was the initial emission inventory for combustion engines used to drive irrigation pumps. The original inventory estimated nitrogen oxide (NOX) emissions (a precursor of PM) at 626 tons per day from all of the diesel engine pumps in the San Joaquin Valley. This would be the highest emissions category for NOX emissions in the San Joaquin Valley, exceeding all the mobile sources including all cars and trucks, which together only emit 353 tons per day. Driven by agricultural inquiries a new study was commissioned that was based on actual interviews with 360 farmers. The new study determined that the NOX emission for these pumps is only 32 tons per day. EPA looked at oxides of nitrogen (NOX) and ammonia (NH3) from soils as contributors to ambient levels of PM-10. This could mean farmers would also have to address the application of fertilizers and pesticides as an air quality concern, not to mention livestock. Yet, recent studies performed indicate that there is very little NOX or NH3 emissions from the soil. Questions about how much particulate matter is released into the air through natural occurrences, such as high wind or volcanoes also remain to be addressed. The present approach will only serve to put American agriculture at a competitive disadvantage with other countries and put agricultural producers out of work. Because U.S. agricultural commodity prices are tied to world prices, a farmer cannot simply "pass on" the cost of doing business to the consumer. In other words, we are "price takers and not a price makers." Therefore, any increase in operational costs of farming is significant and must be based on accurate information that justifies the expenditures.