



Michigan Agri-Business Association

August 30, 2026

Michigan Department of Agriculture and Rural Development
Michigan Agricultural Processing Act Program
P.O. Box 30017
Lansing, MI 48909

RE: Draft 2027 Generally Accepted Processing Practices for Dust

On behalf of the Michigan Agri-Business Association (MABA), thank you for the opportunity to comment on the proposed 2027 Generally Accepted Processing Practices (GAPPs), particularly the new provisions addressing dust mitigation from agriculture facilities. MABA represents handlers of grains and oilseeds, animal feed ingredients, dry edible beans and other products impacted by these GAPPs changes.

We support the overall goal of incorporating reasonable dust-management practices into the GAPPs. Dust is an unavoidable part of normal agricultural processing, including receiving, cleaning, drying, storing and loading agricultural commodities. Our members have a strong interest in managing dust responsibly and minimizing unreasonable impacts on neighbors. The addition of a dust section to the GAPPs will help provide certainty for the industry. The purpose of our comment is to share technical suggestions that reflect the practical realities and diversity of Michigan agricultural processing.

We took note that many of the dust-control practices in the draft GAPPs align with existing U.S. Environmental Protection Agency guidance for cross-sector fugitive dust control. This often covers agriculture alongside other industries. Due to the seasonality and variability of agricultural processing, broader language could be appropriate in certain sections of the draft GAPPs. Here are items we noted for possible changes to reflect unique factors of the agricultural industry, while still conforming to the spirit of properly implementing dust control mitigation.

1. The draft establishes specific vehicle speeds of 5 mph on unpaved surfaces and 10 mph on paved surfaces. Other states' guidance lists "limiting vehicle speeds" or similar language without naming limits. This leaves facilities with the flexibility to properly manage operational or safety realities on-site. The GAPPs should include vehicle speed control but we recommend avoiding specific limits, or add mention of "wherever feasible" or similar language.
2. The GAPPs recommend wheel-wash stations near every vehicle exit. Wheel washes should be noted as one option within a broader menu of practices to prevent track-out and mitigate fugitive dust. In an instance where a wheel wash is not present at every exit to a facility, but is positioned strategically on a site, the GAPPs should recognize the wash likely achieves the desired outcome.
3. Entry and exit paving may face similar facility-specific circumstances that should be considered.
4. The GAPPs draft is right to identify wind speed and direction as factors facilities should take into account during operations. The GAPPs should ensure firms retain flexibility to continue operations during critical periods for farmers and grain handlers, such as harvest. Limiting receiving or commodity handling may not be operationally feasible during harvest, when farmers and processors must take advantage of narrow windows dictated by crop and weather conditions. During these times, facilities could implement additional measures rather than scaling back or pausing business critical operations.



Michigan Agri-Business Association

5. Firms benefit from recordkeeping to demonstrate GAPPs compliance; however, we encourage MDARD to ensure the recordkeeping processes outlined do not create a parallel or duplicative compliance structure for facilities already complying with air permits or other regulatory requirements. This section would benefit from restating that regulated dust sources remain subject to applicable permits and regulatory requirements, and clarifying that existing records maintained pursuant to those requirements may be used to demonstrate GAPPs conformance.
6. The GAPPs draft does a good job setting the tone that each facility is different. For the benefit of future users of the document, we encourage MDARD to reemphasize the many differences among commodities and processing operations. This is especially important for the *“Dryers, Storage and Machinery”* section which includes a wide range of potential practices. Grain elevators, dry edible bean handlers, feed facilities and other agricultural processors use different equipment and operating practices. Their seasonality and operating conditions vary as well. Specific provisions concerning conveyor speeds, receiving practices, product oiling, dust-control equipment and other measures may be appropriate for some commodities but inappropriate for others. The GAPPs cannot be expected to account for every operational circumstance across the many crops and commodities processed in Michigan, so it is critical that the GAPPs frame these management practices as items that should be considered as part of a suite of options tailored to a facility.

Our shared goal is to provide GAAPs that drive toward outcome-based approaches at each facility. The GAPPs should establish a clear expectation that processors use reasonable measures to minimize unreasonable dust impacts, in line with the realities of each facility. The document should clearly reflect that not every practice would make sense at every facility.

This approach will encourage responsible dust management while preserving the flexibility necessary for the success of Michigan's diverse agricultural processing industry, and the many farmers served by ag processors. It will also ensure that the GAPPs remain a reflection of generally accepted industry practices rather than moving toward a new, or duplicative, regulatory program.

Thank you for considering these comments and for the opportunity to participate in this process.

Sincerely,

Chuck Lippstreu
President, Michigan Agri-Business Association
chuck@miagbiz.org
616-265-4698