

# What They Are Saying

## **Chris Morris, National Association of Manufacturers**

“Stricter air quality standards will result in significant portions of our country’s population being in nonattainment areas. Companies investing in new projects in these areas would be required to purchase expensive emission offsets—if offsets are available at all. Federally supported highway and transit projects could not proceed unless the state demonstrates the project will not increase PM2.5 emissions. Even if areas are in nonattainment only briefly, they still must continue to submit complex maintenance plans listing numerous long-lasting control measures. Taken together, these costs would further undermine the competitiveness of American manufacturing.”

02/22/2023

## **The Ohio Manufacturers’ Association**

“Our association represents manufacturers of all sizes in every subsector of the industry. Manufacturing is Ohio’s largest economic sector, employing more than 695,000 Ohioans and contributing more than \$130 billion annually to the economy. ... When the U.S. doesn’t manufacture, capital investment shifts to other countries that do not have the same commitment to environmental stewardship as the U.S.”

02/17/2023

## **Joseph Unger, West Virginia Manufacturers Association**

“Regulations like these [PM2.5 rule proposal] place West Virginia in a negative position when it comes to attracting capital-intensive investments and retaining companies that require a high degree of capital-intensive investments, like manufacturers. Proposals like these will make it hard for our members to maintain operations that succeed at producing American-made products.”

02/23/2023

## **Unions for Jobs & Environmental Progress**

“We view the RIA data as strongly supporting the choice of a 10 ug/m3 standard with no change to the 24-hour 35 ug/m3 standard. We are concerned that a lower annual standard of 8 or 9 ug/m3 would create extensive new areas of nonattainment in the industrialized eastern United States, potentially impeding many of the thousands of projects to be developed with the support of the bipartisan Infrastructure [Investment] and Jobs Act.”

02/15/2023

## **Joseph Stanko, NAAQS Regulatory Review and Rulemaking Coalition**

“If the EPA proceeds with this reconsideration, it will burden states, undermine the ability of businesses to create needed jobs and generate local tax revenue funding critical services, including educators, health care and first responders. The increased costs will promote more offshoring of jobs and manufacturing.”

02/21/2023

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## **Louis Baer, Portland Cement Association**

“According to our own PCA economic analysis, PCA estimates that lowering the primary PM2.5 standard to 10 could result in \$124.2 million in capital expenditures and an increase of \$40.3 million in additional annual operating expenses. The cement industry has experienced tight market supply conditions for the past several years. The cement supply gap has increasingly been filled by imports often in countries with less stringent environmental regulations. Costly new regulations do nothing to relieve these market realities.”

02/22/2023

## **Nick Goldstein, American Road & Transportation Builders Association**

“Altering the particulate matter standards now would have negative effects on both employment and development for the most impacted counties where transportation improvements are delayed or cancelled. In many instances, these federal aid projects are intended to improve demonstrated public safety threats, and once completed, transportation improvements reduce congestion and improve air quality. These improvements won’t be realized if projects can’t go forward.”

02/22/2023

## **Bret Halley, Valley Forge & Bolt Mfg. Co.**

“The U.S. has some of the strongest environmental performance standards in the world, yet there are still areas of the U.S. that are nonattainment under the current PM2.5 standards. Issuing stricter standards will not correct the current areas of nonattainment and will increase costs for manufacturers already in compliance and focused on environmental stewardship.”

02/22/2023

## **American Iron and Steel Institute**

“American steel forms the backbone of the U.S. economy. The PM NAAQS proposal, if finalized, will potentially have significant repercussions on the steel industry by adding substantial new costs and new permitting challenges in both attainment and nonattainment areas.”

02/15/2023

## **Illinois Manufacturers’ Association**

“Families across the U.S., and especially those here in Illinois, are already concerned about the threat of a recession, dealing with high inflation and uncertainty in our nation’s economy. Imposing new, burdensome regulations on manufacturers that our citizens rely on will only further weaken our economy.”

02/24/2023

# What They Are Saying

## South Texas Manufacturers Association

“The new proposed standards would not only hurt existing manufacturing facilities but could also jeopardize the new clean energy manufacturing that is helping us meet our environmental goals.”

02/24/2023

## The Central Valley Business Federation

“Let American business and industry do what they do best: innovate and develop modern technologies that address air quality, reduce emissions and protect the environment, while protecting jobs and growing the economy. More onerous standards and additional permitting challenges are the wrong way to go.”

02/24/2023

## California Apple Commission

“America’s supply chain is still recovering from the global pandemic and ongoing inflation, creating more challenges for farmers, producers and consumers. With these industries contributing over \$1 trillion to the nation’s GDP, increased regulation can cause them to miss a critical investment into its infrastructure and delay permitting for current and future projects.”

03/06/2023

## Texas Association of Business

“Instead of creating unneeded barriers for [American families], we should continue to reinforce regulations we already have in place. ... Manufacturing in the U.S. is cleaner and more sustainable than ever thanks in large part to a revolution in how we produce, use and recycle energy—a revolution that manufacturers have spearheaded.”

03/06/2023

## Illinois Retail Merchants Association

“As the voice of Illinois retailing, we join stakeholders from across the U.S. in strong opposition to EPA’s PM 2.5 rule proposal that would impose stricter air standards on U.S. businesses ... The IRMA is concerned that this new proposed rule would create unnecessary obstacles across numerous sectors of the U.S. economy that would ultimately lead to supply chain challenges and higher prices.”

03/06/2023

# What They Are Saying

## U.S. Chamber of Commerce

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“One concern with EPA’s proposal is that the agency has not identified all necessary control pathways to meet lower standards. The agency states in its Regulatory Impact Analysis that “[t]he estimated PM2.5 emissions reductions from these control applications do not fully account for all the emissions reductions needed to reach the proposed and more stringent alternative standard levels in some counties in the Northeast, Southeast, West and California.” This is one reason the Chamber asked EPA to propose maintaining the current standards as an option for serious consideration. It is untenable for the agency to propose standards for which the agency has not articulated a feasible path to compliance. Importantly, lack of identification of all control pathways means that the proposal underestimates regulatory costs and also raises the serious possibility that the only path to compliance in some areas will be closure of existing manufacturing and industrial facilities.”

03/06/2023

## Alamo Area Council of Governments

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“AACOG is concerned about the EPA lowering the standard with uncertainties remaining in the current epidemiological evidence. With these uncertainties present, AACOG argues that reducing the primary annual PM2.5 NAAQS below 11.0 pg/m<sup>3</sup> may not provide additional support for the protection of public health and public welfare.”

03/08/2023