

# 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

# What They Are Saying

## **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

“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

“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

## North Texas Commission

“Our country already has strong regulations in place—ones that areas across the U.S. are still working to meet. While air quality across Texas is improving, there are still areas in our state that do not consistently meet the 2008 or 2015 federal air quality standards. The EPA should focus on enforcing the regulations we already have in the books and working with local communities and businesses to generate productive solutions to our environmental challenges...It would be a strategic blunder to exclude North Texas businesses from these exciting economic opportunities because they are forced to divert resources toward burdensome regulatory compliance instead of investing in jobs, facility expansions, and new technological advancements.”

03/21/2023

## Delegate Jarred Cannon, West Virginia Legislature

“Proposed rule changes like these create more confusion and delay the progress that state leadership has made to foster a more prosperous economy with ample jobs for all West Virginians. Our manufacturing industry is already meeting current NAAQS standards and actively working to develop technology that makes our air cleaner.”

03/22/2023

# What They Are Saying

## Georgia Restaurant Association

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“At a time where many industries, and in particular the restaurant industry, are still reeling from the effects of the pandemic and inflation, the EPA ought to foster policies that promote American innovation versus tearing down what all of us have worked hard to rebuild. The EPA should not look to tack on additional regulations that have potentially disastrous consequences. [...] Let’s be sure America can continue to produce the latest and greatest technologies right here at home.”

03/27/2023

## Susan E. Dudley, Director of the George Washington University Regulatory Studies Center

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“While the EPA sets the standards without regard to cost or feasibility, it is the states who bear the responsibility for meeting them, and a “nonattainment” designation seriously limits a region’s opportunities for growth. Researchers estimate that nonattainment areas lose billions of dollars every year due to reduced manufacturing productivity.”

03/27/2023

## Bob Gibbs, Former U.S. Representative

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“I have owned and operated Hidden Hollow Farms in Holmes County, Ohio, for decades, and in that time, I have seen the impact that broad, top-down regulation can have on farms across our country, especially smaller family-run operations. These farms operate on thin margins and many do not have the resources to implement new technologies, employ alternative tilling or harvesting methods, or overhaul their equipment in order to comply with federal air quality regulations. I am concerned that the EPA’s NAAQS PM2.5 proposal would be yet another headwind facing our nation’s farmers who are already contending with high fuel costs, labor shortages, and historic inflation. In addition to the direct impact of the NAAQS regulations, farmers would also feel the knock-on effects of price increases due to the steep compliance costs imposed on the manufacturers of equipment, energy, and agricultural inputs, such as fertilizer.”

03/28/2023

## Speaker Roger Hanshaw, West Virginia House of Delegates

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“The EPA’s NAAQS PM2.5 proposal would exacerbate current permitting challenges and force businesses across the country—from farmers to manufacturers—to adopt emission control technologies in order to comply with the stricter standards. Areas unable to meet the standards also face having federal transportation infrastructure funding restricted if it is determined that projects would increase PM2.5 emissions.”

03/28/2023

# What They Are Saying

## National Association of Forest Service Retirees

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“The National Association of Forest Service Retiree’s (NAFSR) is concerned that this proposed rulemaking will reduce the Nation’s ability to implement strategies intended to reduce unwanted wildfire effects on communities and wildlands, including barriers to increasing the pace and scale of prescribed burning.”

03/29/2023

## Chemical Industry Council of Illinois

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“With a lowered NAAQS, states will have to begin a designation process for airshed based on current ambient monitor data. There will be several areas in Illinois that will not meet the new standard, which will be designated nonattainment areas and will trigger new source review permitting requirements. In Illinois, new source review permitting regulations will need to be amended to address PM2.5. Economic development in nonattainment areas will be delayed an, in many instances, discontinued.”

03/29/2023

## Iowa Association of Business and Industry

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“[Iowa Association of Business and Industry] joins manufacturers across the U.S. in strong opposition to the proposed rule. The U.S. already has strong regulations in place and we should be focused on enforcing the regulations we already have on the books before proposing new, more stringent standards.”

03/29/2023

## National Cotton Ginners Association

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“A reconsideration is not required by rule and adds significant uncertainty to the NAAQS implementation process. Any change to the PM standards will have a significant economic impact on the US economy and the agriculture industry. These impacts will greatly affect small businesses, such as agriculture.”

03/29/2023

## Lebanon Valley Chamber of Commerce

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“Recently, we have been encouraged by the investments in our nation’s transportation infrastructure; however, the proposed NAAQS revisions could delay and erode those investments before projects are shovel ready. Tightened standards would plunge areas across the country, and the Commonwealth, into nonattainment, forcing our local businesses to contend with stringent regulations, emission controls, and retrofits of existing facilities.”

03/29/2023

# What They Are Saying

## Arizona Chamber of Commerce & Industry and Arizona Manufacturers Council

“Despite tremendous population and economic growth over the last 30 years, overall emissions of air pollution throughout Arizona have declined. While there may yet be work to do, the EPA’s proposed rule is the wrong approach. We believe that the best environmental solutions occur in the best of economic conditions.”

03/29/2023

## Midwest Ozone Group

“Lowering the annual particulate matter standard will result in significant implications for permitting sources and source sectors in the US economy that are already stressed.”

03/29/2023

## Wisconsin Prescribed Fire Council

“We are concerned that there could be unintended consequences for the necessary use of prescribed fire to mitigate wildfire impacts and restore and maintain the health of fire-dependent ecosystems. In essence, we are concerned about how these new standards are enforced even though we strongly support the importance of the standard itself.”

03/29/2023

## Michigan Agri-Business Association

“The U.S. already has some of the world’s most rigorous environmental performance standards. Issuing stricter NAAQS regulations will leave behind areas already in nonattainment of the current standards and push vast swaths of the nation into nonattainment of the new standards. Contending with the additional permitting obstacles and emission controls would divert time and capital that could be invested in facility expansions and creating new jobs.”

03/29/2023

## Minnesota Chamber of Commerce

“While the Minnesota Chamber of Commerce and its members are committed to continuing progress in reducing emissions, more stringent ambient air standards would move closer to background concentrations, therefore limiting the cost-effective technology and policy tools available for compliance.”

03/29/2023

# What They Are Saying

## Greater Houston Partnership

“Houston companies are investing billions in clean technology and climatetech – it's estimated that around \$15 billion of energy transition-related investments flowed into Houston in 2021. However, the proposed standards could jeopardize momentum in the energy transition by demeaning our regional competitiveness and diverting capital investment into costly permitting procedures.”

03/29/2023

## Clark County Department of Environment and Sustainability

“Clark County may face significant challenges in attaining and maintaining a more stringent PM2.5 NAAQS due to its geographic location, transported pollution, exceptional events (EE), and other unique local factors. Air quality in the West is generally influenced by high elevations, extreme variations in topography, vast landscapes, and variable weather patterns, which all present unique challenges for Clark County in attaining and maintaining the PM NAAQS.”

03/29/2023

## West Virginia Chamber of Commerce

“The funds to undertake these requirements simply do not exist, and EPA failed to estimate the full costs and burdens associated with meeting the proposed standard levels, particularly upon at-risk communities across the country. Simply put, there is no feasible path to compliance without extensive closure of existing manufacturing, industrial, and agricultural facilities – putting many hardworking West Virginians and Americans out of work. While the West Virginia Chamber of Commerce and its members are committed to continuing progress in reducing emissions consistent with the Clean Air Act, this arbitrarily drafted proposal is harmful and unattainable.”

03/29/2023

## Goldwater Institute

“The EPA's proposal to revise NAAQS standards for PM2.5 is a prime example of government action with uncertain benefit and clear costs to families and employers. For example: in order to comply with these new standards, businesses will be forced to adopt new emission-control technologies – the application of which will cost billions of dollars annually, according to the EPA's own estimates. These are resources that businesses must redirect away from critical investments in their facilities, R&D, employee pay and other needs.”

04/03/2023



# What They Are Saying

## California Manufacturers & Technology Association (CMTA)

“The imposition of this new burdensome regulation on the industry will further weaken an already slowing economy...For California, the proposal and related impacts will be the most dramatic, and it also lacks a full assessment of the financial impacts that will be borne by industry and the local communities.”

04/03/2023

## Santa Barbara County Taxpayers Association (SBCTA)

“Many areas of California are currently in nonattainment of the current NAAQS PM2.5 thresholds, and businesses have invested heavily to modify their operations and upgrade their equipment in an effort to come into compliance with these air quality standards. Moving forward with more stringent NAAQS regulations will cause additional counties in our state to fall into nonattainment status and leave current nonattainment areas even further behind. These impacts are not isolated to the manufacturers and industries that must reduce emissions to comply with the NAAQS PM2.5 standards. The compliance costs, restricted investment, and shuttered operations that stem from these regulations are passed along in the form of higher food, energy, and transportation costs for consumers.”

04/03/2023

## Grand Rapids Chamber of Commerce

“EPA’s NAAQS PM2.5 proposal threatens to worsen the economic challenges that Michiganders are currently facing, including record inflation and the increasing likelihood of a recession. Our members, their employees and the customers they serve are slowly emerging from the financial hole that was brought on by the COVID-19 pandemic. EPA should not jeopardize this recovery with burdensome air quality regulations.”

04/03/2023

## Michigan Agri-Business Association

“Manufacturing in the U.S. has some of the strongest environmental performance standards in the world. Making permitting harder not only hurts existing manufacturers but could jeopardize the new clean energy manufacturing that we need to fight climate change. If we can’t grow manufacturing at home, other countries, who don’t have the same rigorous regulations, will step in, and fill the void left by U.S. manufacturers with a resultant increase in PM2.5, CO<sub>2</sub> and other pollutant emissions.”

04/03/2023

# What They Are Saying

## Home Builders Association of Greater Savannah

“If this rule is enacted, however, it poses a major threat to local industry and the communities that work to support these industries. This rule will have far-reaching, unintended consequences that will permeate businesses and individuals up and down the supply chain. If manufacturers like Hyundai are forced to make concessions or implement costly compliance measures as a direct result of this onerous rule, capital investment could move to countries with less restrictions and a more favorable capital investment environment.”

04/03/2023

## Greater Reading Chamber Alliance (GRCA)

“The objection to the proposed regulation is not about a disregard for our environment, but from an understanding that each and every regulation comes with a cost. In the case of NAAQS requirements, the average cost of reduction every few years by another five microns is in the millions per facility. The constant changing of requirements and the moving of the goal post adds costs that the business cannot use to invest in the business’ operations or the employees.”

04/03/2023

## Steel Manufacturers Association (SMA)

“SMA believes that EPA’s proposed revisions to the PM2.5 standard do not sufficiently recognize the tremendous air quality improvements that have already been achieved through the existing NAAQS and other Clean Air Act (“CAA” or “the Act”) programs. And by inadequately considering the existing air quality improvements that have been accomplished through the efforts of the domestic electric arc furnace (“EAF”) steel industry and others, EPA’s proposal would ultimately require those same industries to attempt to achieve even more PM reductions but at substantially higher costs and with far less certainty about the feasibility or benefits of those reductions.

04/03/2023

## Travis Fisher, Senior Research Fellow, Heritage Foundation

“The EPA should follow the latest science and retain today’s PM2.5 standards. In tightening the primary annual PM2.5 standard, the Proposed Rule: weakens the economy [by contributing] to the continued deindustrialization of America; harms public health by exacerbating poverty; may threaten electric grid reliability; is political rather than scientific; overestimates the economic cost of PM2.5 exposure; does not establish harm from exposure to very low concentrations of PM2.5; fails to distinguish the health effects from different chemical species of PM2.5; violates the Unfunded Mandates Reform Act; and Violates the Clean Air Act.”

04/03/2023

# What They Are Saying

## Newmont Corporation

“As the National Ambient Air Quality Standards (“NAAQS”) approach background levels of PM2.5, additional reductions in the standard become increasingly problematic—resulting in misplaced control measures and associated compliance costs without attendant health benefits. For these reason, Newmont CC&V therefore urges EPA to retain the current primary annual PM2.5 standard as well as the current primary and secondary 24-hour PM10 standards.”

04/03/2023

## California Walnut Board & Commission

“With these existing obstacles in mind, it is hard to imagine the EPA adopting an even stricter PM2.5 standard. While these air regulations would result in onerous permitting challenges and compliance costs for many parts of the country, they would be devastating for areas currently in nonattainment. It is imperative that we have an opportunity to achieve the existing standards before the “goal-posts” are moved further downfield.”

04/03/2023

## National Mining Association (NMA)

“Demonstrating compliance with more stringent PM10 and PM2.5 standards would have significant technical and economic impacts on NMA’s members, the communities in which they operate, and the states that implement the NAAQS. Our member’s facilities are already meeting extensive requirements to control coarse PM through a variety of federally enforceable technology and management requirements imposed by State Implementation Plans and the New Source Review program.<sup>2</sup> Given the extensive nature of the controls that mines and related facilities are already subject to, we fear that little more can be done to comply with a more stringent coarse PM NAAQS other than to scale back or shut down operations.”

04/03/2023

## Arizona Farm Bureau Federation (AZFB)

“It is unclear whether this revised standard will lead to lower health risks, but it will undoubtedly create significant costs for the regulated community, including farmers and ranchers. This proposal would threaten agricultural operations that are already hampered by high fuel costs and supply chain challenges, as well as labor and water shortages. Unnecessary regulations like those created in the current proposal would only saddle our agricultural community with additional hurdles.”

04/03/2023

# What They Are Saying

## National Grain and Feed Association

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“Lowering the PM2.5 standard could increase the requirement for grain handling facilities to demonstrate that they are not contributing to non-attainment. The uncertainty in the PM2.5 emission factors will place an undue burden on the grain handling industry to make this demonstration and could result in unnecessary operational restrictions, installation of controls devices, or shuddering of operations.”

04/03/2023

## Martin J. Durbin, U.S. Chamber of Commerce

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“The Chamber disagrees, however, with EPA’s proposed revision of the annual PM2.5 NAAQS and recommends that EPA retain the existing 12 µg/m<sup>3</sup> standard. Particularly with a new five-year NAAQS review deadline on the horizon, attempting to tighten the PM NAAQS at this time through a short-circuited, truncated reconsideration proceeding would not be a prudent use of Agency resources.”

04/04/2023

## Competitive Enterprise Institute (CEI)

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“The EPA’s proposed discretionary decision to reconsider the PM standards is premature. In addition, the proposal to reduce the primary annual fine particle (PM2.5) standard does not properly consider the unnecessary harms that it will cause or the major flaws throughout the process. The EPA’s premature reconsideration and selective use of peer-reviewed studies reflect a more fundamental politicization of air pollution research—a condition attributable in part to the agency’s outsized role as chief funder of air pollution studies.

04/05/2023

## American Farm Bureau Federation

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“Lowering the standard will create a regulatory burden that undermines community business investment, reduces tax revenue that supports local schools and first responders, and hamstrings efforts to overcome tough economic times. These impacts reverberate to every part of the country and will have an impact on farmers and ranchers as we continue to battle volatile markets and record-high production expenses.”

04/05/2023

# What They Are Saying

## Board of County Commissioners of Weld County, Colorado

“The proposed revision of the PM2.5 NAAQS is anticipated to significantly affect much of Colorado’s Northern Front Range, including Weld County. Weld County is concerned about the adequacy of the Greeley Hospital PM2.5 monitor (AQS Site ID: 08-123-0006) for regulatory decisions, such as an attainment determination. Secondly, Weld County is concerned about adequacy of existing exceptional events demonstration guidance, tools, and procedural requirements if a more stringent PM2.5 NAAQS is promulgated.”

04/05/2023

## Dow Chemical Company

“This reconsideration of the primary annual standard approximately halfway between December 18, 2020, and December 18, 2025, is entirely discretionary and EPA is not required by the Clean Air Act’s regular five-year review cycle to complete it. In fact, this action throws into question whether EPA should complete another review of the standard(s) in 2025 or should then proceed to review the standard(s) again in the 2028 timeframe?”

04/05/2023

## American Chemistry Council (ACC)

“American Chemistry Council (ACC): “ACC supports retaining the current PM2.5 NAAQS and believes it remains protective of human health with an adequate margin of safety. ACC does not believe that the record and scientific evidence established in the 2019 Integrated Science Assessment (2019 ISA), the Supplement to the 2019 ISA (ISA Supplement), and the quantitative and policy analyses in the Policy Assessment (PA) have established concrete evidence of adverse health effects at a level below the current primary annual PM2.5 standard of 12.0 mg/m3.”

04/05/2023

## Ben Toma, Speaker of the Arizona House of Representatives

“As a small-business owner, I am keenly aware of the challenges that Arizona's small businesses face – often at the hands of government. Additional regulatory red tape from the EPA will only make matters worse. Now is not the time for one-size-fits-all regulation that doesn’t take into account the unique needs and circumstances of individual states.”

03/07/2023

# What They Are Saying

## Illinois Chamber of Commerce

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“Tightening these standards even further before all areas are in attainment of the current regulations adds insult to injury and makes permitting more difficult for manufacturing operations and infrastructure projects across America.”

03/06/2023

## Doug McLinko, County Commissioner of Bradford County, PA, and President of American Rural Energy Coalition

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“The Biden administration says it is prioritizing investing in rural health. However, this proposed rule could have detrimental outcomes on job growth and retention of workers in rural America.”

03/07/2023

## Home Builders Association of Utah

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“Reductions of PM2.5 levels without identifying the actual cause and addressing it at the source, simply increase Utah’s non-attainment days and does nothing to improve air quality.”

03/24/2023

## African American Farmers of California

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“As an organization promoting local and sustainable farming, we join industry across the U.S. in strong opposition to EPA’s PM2.5 rule proposal that would impose stricter air standards on U.S. businesses.”

03/27/2023

## Georgia Mining Association

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“These burdensome regulations could halt our industry and put critical jobs on the line – further weakening an already slowing economy. If the U.S. wants to be the leader in technology and manufacturing, it cannot be done without the mining industry. More demanding standards and additional permitting challenges are the wrong way to go.”

03/27/2023

# What They Are Saying

## Nisei Farmers League

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“California farmers are still struggling to implement the last round of EPA air quality standards. Adding new regulations would cripple our industry. Farmers could be forced to offshore their operations, moving their growing to countries with lower quality standards. This is not only a loss for the American workforce and consumers, but it could result in higher food prices in California and across the U.S.”

03/27/2023

## Metallurgical Coal Producers Association

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“However, the EPA’s PM2.5 rule proposal would impose stricter air standards on U.S. businesses and affect not only the trajectory of our industry, but also the successful development of the critical infrastructure projects our country desperately needs.”

03/28/2023

## Texas Association of Manufacturers

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“Our membership and the customers they serve are already facing a slowing economy and high inflation. Additionally, manufacturers must contend with the existing labyrinth of federal, state, and local regulations required to operate and grow their facilities. EPA should not add to these challenges by adding another layer of red tape. We strongly urge EPA to reconsider its NAAQS PM2.5 proposal.”

03/28/2023

## Pennsylvania State Grange

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“Unfortunately, EPA’s NAAQS PM2.5 proposal would impose burdensome compliance costs on our farming community at a time when they are already contending with soaring fuel, labor, and equipment prices. Rural Pennsylvanians are also facing obstacles when it comes to invasive species, such as the Spotted Lanternfly, which has wreaked havoc on Pennsylvania crops and resulted in strict quarantine protocols for 51 of 67 counties. EPA analysis estimates that the proposed rule would result in tens of millions of dollars in annual compliance costs for Pennsylvania businesses. In addition to pollution control measures to address certain agricultural practices and dust from paved and unpaved road dust, farmers would also be saddled with higher costs for fertilizer and other manufactured goods.”

03/22/2023

# What They Are Saying

## Illinois Petroleum Council

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“Nationally, the IPC and our partners represent more than 580 members, including large integrated companies, exploration and production, refining, marketing, pipeline, and marine businesses, and service and supply firms. These members support 9.8 million U.S. jobs (263,000 in Illinois alone) and 8 percent of the U.S. economy, delivers \$85 million a day in revenue to our government, and, since 2000, has invested over \$2 trillion in U.S. capital projects to advance all forms of energy, including alternatives. The IPC appreciates this opportunity to express our opposition to the EPA’s PM 2.5 rule proposal that would impose stricter air standards on U.S. businesses.”

03/15/2023

## Illinois Farm Bureau

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“Lowering the standard will create a regulatory burden that undermines community and business investment, reduces tax revenue that support local schools and first responders, and effectively hamstrings efforts to overcome tough economic times. These impacts reverberate to every part of Illinois and will have an impact on farmers as we continue to battle volatile markets and record high production expenses.”

03/28/2023