



August 3, 2020

The Honorable Andrew Wheeler, Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

**RE: Comments on Docket ID Number: EPA-HQ-OAR-2020-00044 – “Increasing Consistency and Transparency in Considering Benefits and Costs in the Clean Air Act Rulemaking Process”**

The South Carolina Manufacturers Alliance (“SCMA”) appreciates the opportunity to provide comments on the United States Environmental Protection Agency’s (“EPA” or “Agency”) proposal to increase consistency in considering of benefits and costs in future rulemakings under the Clean Air Act (“CAA”). SCMA is an organization that represents more than 400 manufacturing facilities with over 80,000 employees operating and working in South Carolina. Our members appreciate the importance of environmental stewardship and respect the need for necessary and effective regulations to protect our natural resources.

Therefore, SCMA commends the EPA for working to improve the regulatory process to ensure CAA regulations are effective, based on objective science, and take into consideration both the benefits to the environment and the associated costs to manufacturers. By ensuring the EPA’s rulemaking process uses clear and consistent data showing how the EPA develops proposed rules will benefit the environment, economy, public, industry, and all stakeholders. This rule is necessary to improve consistency and transparency in how the EPA assesses risk and estimates benefits and costs.

SCMA believes the EPA has the authority under Section 301 of the CAA to issue this rule and the final rule would be binding on the EPA. We encourage EPA to use scientific, engineering, and economic best practices as the basis for developing the analyses and encourage the Agency to include detail concerning the best practices in the preamble of the final rulemaking and in the regulatory text. SCMA respectfully requests the final rule to require EPA to undertake a non-binding determination of whether the benefits of the statutory objective of the regulatory provision justifies the cost as part of the benefit-cost analysis. Additionally, we hope the Agency will promulgate language that guarantees all underlying risk assessments supporting significant CAA regulation, especially those that provide key inputs to the development of the Agency’s health benefit estimates in the benefit cost analyses, are consistent with best practices. Finally, we recommend that the EPA should present benefit cost analyses in a manner consistent with reasoned economic and scientific judgments about uncertainties.

Thank you for allowing me the opportunity to share my support for this proposal and some recommendations on behalf of SCMA and our members.



Sincerely,

A handwritten signature in black ink, appearing to read 'JFW' with a flourish at the end.

John F. Wall IV  
General Counsel & Vice President of Government Relations  
South Carolina Manufacturers Alliance