



Pennsylvania Aggregates and Concrete Association

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Office of Air Policy and Program Support
Office of Air and Radiation
Environmental Protection Agency, Mail Code 6103A
1200 Pennsylvania Avenue NW
Washington, DC 20460

RE: EPA-HQ-OAR-2020-0044
Increasing Consistency and Transparency in Considering Benefits and Costs in the Clean Air Act Rulemaking Process (85 FR 37057)

On behalf of the members of the Pennsylvania Aggregates and Concrete Association (PACA), we are supporting the comments of the National Stone, Sand & Gravel Association (NSSGA) regarding the Environmental Protection Agency (EPA)'s proposal titled "Increasing Consistency and Transparency in Considering Benefits and Costs in the Clean Air Act Rulemaking Process" (85 FR 37057). We too strongly support EPA's continuing efforts on regulatory reform.

The Pennsylvania Aggregates and Concrete Association (PACA) is the trade organization for the aggregates (crushed stone, sand and gravel), ready mixed concrete and cement companies in Pennsylvania. Our 162-member companies, of all sizes and types, are involved in the production of the above commodities or provide support products and services to the construction materials companies. We appreciate the opportunity to comment on the above proposed document.

As a brief summary, we support the proposed consistency and transparency of a benefits cost analysis (BCA), limiting this analysis to only the most significant subset of regulations and risk analysis, inclusion of the effects of unemployment with cost-benefit analyses, keeping domestic and non-domestic costs and benefits separate where possible, expanding these requirements to all benefit-cost analyses the Agency conducts, updating the weight-of-evidence framework to include a more complete toolbox, and working towards standardized definitions for the risk assessment portion of the Agency's benefit-cost analyses.

We appreciate the opportunity to comment and supports this effort by EPA to increase consistency and transparency in analyzing costs and benefits of air regulations.

Sincerely,

Josie Gaskey
Dir., Environmental, Safety & Health

cc: Peter Vlahos
Emily Coyner, NSSGA

