

September 7, 2023

Michael Regan
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Dear Administrator Regan,

The undersigned associations are writing to urge EPA to maintain the existing National Ambient Air Quality Standards (NAAQS) for fine particulate matter. Lowering standards further would harm America's ability to revitalize our supply chains and manufacturing, as well as to restore and revitalize our nation's infrastructure. In addition, the current reconsideration is discretionary and not required by the Clean Air Act as the existing standards were just reviewed in 2020.

America's air continues to improve. The business community has worked with EPA and its state partners to lower fine particulate matter (PM_{2.5}) emissions by 42 percent since 2000¹ and is making significant progress even with the steady growth in the U.S. economy, population, and energy use. Thanks to innovation and investment, new emissions control technologies and solutions have been widely adopted to improve air quality.

The vast majority of PM_{2.5} emissions, more than 84 percent, now come from non-point sources² such as fires and unpaved roads. The larger amounts of particles and gaseous PM_{2.5} precursors resulting from the devastating wildfires in Canada and the West are stark reminders of the smothering blanket of emissions that cause serious impairment of air quality and why forestry management would appear to offer the greatest opportunity to reduce PM_{2.5} emissions. In contrast to non-point sources, only 16 percent of PM_{2.5} emissions come from industrial sources and power plants that are already well controlled and are making further reductions.

With twenty counties still out of attainment with, or in a maintenance area for the current 12 µg/m³ annual air quality standards,³ tightening the standards further would put large swaths of the country in non-attainment and permitting gridlock. In

¹ U.S. EPA, Our Nation's Air: Trends Through 2022, https://gispub.epa.gov/air/trendsreport/2023/#air_trends.

² U.S. EPA, Policy Assessment for the Reconsideration of the National Ambient Air Quality Standards for Particulate Matter, May 2022, https://www.epa.gov/system/files/documents/2022-05/Final%20Policy%20Assessment%20for%20the%20Reconsideration%20of%20the%20PM%20NAAQS_May2022_0.pdf.

³ U.S. EPA, Green Book, July 31, 2023, <https://www3.epa.gov/airquality/greenbook/kbtc.html>.

some areas, even eliminating *all* emissions from industrial sources, power plants and vehicles would likely not be sufficient to meet the existing PM_{2.5} standards, let alone tighter standards.

As the PM_{2.5} standards approach background levels, there are fewer tools available for compliance. This is not only an issue for nonattainment areas, but also for adjacent areas as well. The inability to comply with these near-background level standards could lead to consequences such as onerous permitting requirements that would freeze manufacturing and supply chain investments, as well as other unintended consequences. Recent supply chain disruptions exposed economic and national security vulnerabilities and the need for massive domestic investments in such activities as mining and processing of critical minerals for priorities like renewable energy, semiconductor manufacturing, and energy development for us and our allies.

Lowering the PM_{2.5} air quality standards through discretionary rulemaking endangers these investments and the associated good paying jobs. One study found that lowering the standards would threaten close to one million jobs and \$200 billion in economic activity.⁴ The economic impacts are estimated to be high because the headroom between PM_{2.5} background levels and lower standards would shrink considerably, making each increment of additional reductions exceedingly more costly to achieve.

Given the progress being made to reduce emissions, and the potential harm that could be caused by lowering standards further, we ask that EPA maintain the existing standards while continuing to support innovation and current emissions reduction efforts. Thank you for your time and consideration.

Sincerely,

Agricultural Retailers Association
The Aluminum Association
American Chemistry Council
American Coke and Coal Chemicals Institute
American Council for Capital Formation
American Exploration & Production Council
American Farm Bureau Federation
American Forest & Paper Association
American Fuel and Petrochemical Manufacturers
American Iron and Steel Institute

⁴ National Association of Manufacturers, U.S. Air Quality Standards and the Manufacturing Sector, April 2023, https://documents.nam.org/COMM/NAM_Air_Quality_Standards_Analysis_Web_Version.pdf.

American Petroleum Institute
American Public Gas Association
American Public Power Association
American Road & Transportation Builders Association
American Wood Council
Associated Builders and Contractors
Associated General Contractors of America
Consumer Energy Alliance
Corn Refiners Association
Council of Industrial Boiler Owners
Energy Marketers of America
The Fertilizer Institute
Hardwood Federation
Interstate Natural Gas Association of America
National Association of Manufacturers
National Lime Association
National Mining Association
National Oilseed Processors Association
National Rural Electric Cooperative Association
National Stone, Sand, & Gravel Association
Portland Cement Association
Steel Manufacturers Association
Treated Wood Council
U.S. Chamber of Commerce