



# Here's Why the EPA's Proposed Air Quality Standards Will Cause Permitting Gridlock Across our Economy

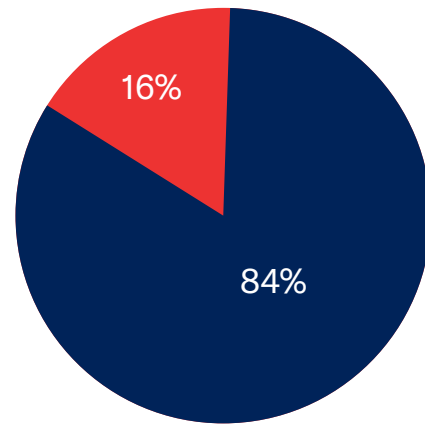
Everyone believes clean air is important. Thanks to technological advances and years of cooperation among businesses, states and the federal government, America's air is cleaner than ever—1.6 times cleaner than Europe. And thanks in part to investments in the clean energy transition, air quality continues to improve.

One measure of air quality uses a standard for particulate matter (PM<sub>2.5</sub>) – fine particulates that are more than 20 times smaller than a human hair. PM<sub>2.5</sub> is made up of a complex mixture of tiny particles of everything from forest fire smoke to liquid droplets. The good news is that ambient levels of PM<sub>2.5</sub> have decreased by 42 percent over the last 20 years and continue to drop.

Despite these ongoing and significant air quality improvements, EPA has proposed a discretionary rule that would lower PM<sub>2.5</sub> standards to a level that threatens investment in manufacturing, critical infrastructure projects and more. If EPA tightens the standards to the lowest levels being considered, it would put almost 30 percent of U.S. counties in permitting gridlock. The problem with this proposal is that because of all the progress we've made, most PM<sub>2.5</sub> is now generated by what are called "non-point" sources that are difficult, costly, and sometimes infeasible to control. The chart to the right illustrates the issue at hand.

Fires are now the largest source of PM<sub>2.5</sub>. Due to their small size, these particles can drift long distances. The impact of fires can be felt around the country. For instance, counties in Arizona may violate EPA's standards because of fires in California.

### PM<sub>2.5</sub> Predominantly From Non-Point Sources



● Point ● Non-Point

#### Point Sources

Power	11%
Industrial	5%
<b>Total</b>	<b>16%</b>

#### Non-Point Sources

Fires	43%
Road Dust	16%
Ag Dust	14%
Other	6%
Cars/Trucks	5%
<b>Total</b>	<b>84%</b>

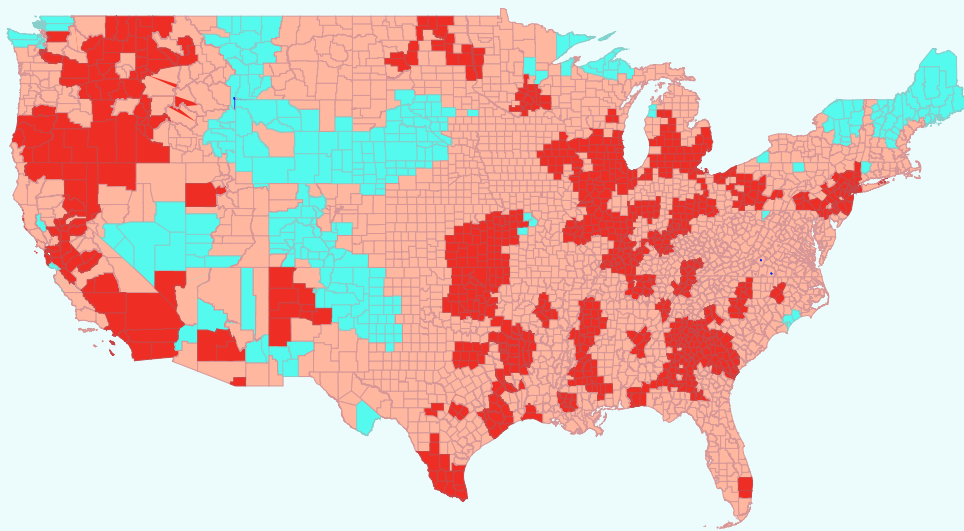
Source: U.S. EPA's Policy Assessment for PM NAAQS



A new analysis by the U.S. Chamber finds that the impact of non-point sources is only getting worse. For example, the 2023 fire season is proving to be one of the worst yet. As a result, if the standard is lowered to the level EPA proposes and PM<sub>2.5</sub> data from this year – including forest fires - is factored in, **47 percent more counties would be in violation of the standard and face permitting gridlock, thereby restricting economic growth.**

That means **850 counties in the United States would be in violation (dark red) of the standards.** Counties with PM<sub>2.5</sub> levels just below the standards, the areas shown in lighter red, would also face restrictions on development, as they would have little headroom to build new infrastructure, expand manufacturing, and stimulate economic growth. Few areas of the country would be left unaffected (teal).

### Projected Nonattainment Impacts of PM<sub>2.5</sub> at 9.0 ug/m3



2021-2023 Est. Annual PM<sub>2.5</sub> Design Values

- Nonattainment
- 1-3 ug/m3 headroom
- >3 ug/m3 headroom

## Potential negative impacts of the EPA Rule:



Block permitting of new manufacturing facilities and associated good-paying jobs, pushing investment overseas



Prevent building roads, bridges, and other infrastructure that was funded by the bipartisan infrastructure bill that would have eased congestion



Require mitigation from homeowners, restaurants, and small businesses putting burdens on all Americans



Increase costs and worsen inflationary impacts of doing business in the U.S. threatening close to \$200 billion in economic activity and putting at risk 1 million jobs according to Oxford Economics



Place burden on private sector despite fires being the main PM<sub>2.5</sub> source