

August 2, 2016

Aaron Yeow
Designated Federal Officer
EPA Clean Air Scientific Advisory Committee
US Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: EPA Draft Integrated Review Plan for the National Ambient Air Quality Standards for Particulate Matter. 81 Fed. Reg. 22977

The National Association of Manufacturers (NAM), the nation's largest manufacturing trade association representing small and large manufacturers in every industrial sector and in all 50 states, submits the following comments regarding the Clean Air Scientific Advisory Committee's (CASAC's) response to the Environmental Protection Agency's (EPA) Draft Integrated Review Plan (Draft IRP) for the National Ambient Air Quality Standards (NAAQS) for Particulate Matter (PM).

The NAM and our manufacturing member companies are committed to protecting the environment and improving air quality. As a sector, manufacturers have made substantial investments over time to minimize their environmental footprint, and continue to do so today. Due in part to the laws already in place and industry's commitment to improving the efficiency of operations and lessening environmental impacts, the consistent trend of improving air quality is expected to continue into the foreseeable future. Manufacturers believe that environmental policies should be designed with balance in mind, which includes promoting desired environmental objectives while avoiding unnecessary adverse economic and social impacts.

Since 2000, PM levels are down nationwide by over one-third. This progress will continue and manufacturers will continue to lead in reducing emissions, but the regulatory and permitting requirements associated with ever-tightening NAAQS are making it increasingly difficult for manufacturers to invest, expand and innovate—all critical to a strong economy. Today and under the existing standards, manufacturers struggle to get their necessary air permits to expand and operate even in areas of the country that are in attainment, because of the thin margin between federal standards and background air quality levels. The picture is much bleaker for manufacturers operating or looking to invest in nonattainment areas.

As CASAC knows firsthand, the process of reviewing any NAAQS, and particularly the PM NAAQS, is highly involved and complex. As standards are lowered closer to background or natural levels, even small revisions to the NAAQS can have enormous implications to manufacturers' operating costs and competitiveness. It is critical that EPA and CASAC review carefully and deliberatively all material associated with this review process, and adhere to all requirements established under the Clean Air Act.

One such requirement that the NAM continues to urge EPA and CASAC to consider in this and other NAAQS reviews is the economic impacts of attaining and maintaining a stricter standard. Section 109(d)(2)(C) of the Clean Air Act requires CASAC to advise the Administrator of “any adverse public health, welfare, social, economic, or energy effects which may result from various strategies for attainment and maintenance of such national ambient air quality standard”. To our knowledge, this statutory requirement has never been adhered to by CASAC in its review and recommendations for NAAQS, which in the NAM’s opinion has been an oversight by the Committee in fulfilling its responsibilities.

Strategies for bringing nonattainment areas into attainment and ensuring regions currently meeting standards maintain that status are complicated and often costly endeavors the impacts of which can reverberate throughout the economy. When the time comes for the CASAC recommendation to EPA on the PM NAAQS, the NAM urges CASAC to adhere to its statutory duty and advise the Administrator about any adverse economic impacts that may arise from measures involved in attaining any new standards.

Additionally, the NAM encourages CASAC to continue urging the EPA to allow adequate time for a detailed review of all materials associated with the PM NAAQS review process. This includes developing and releasing for public comment the necessary drafts of scientific and policy assessments required for a sufficient review of this complex issue. It is critical that EPA maintain a realistic schedule for completing a thorough review of the PM NAAQS. The NAM strongly believes that the increasing complexity of NAAQS reviews along with EPA’s current draft schedule for its PM review are compelling indicators that Congress should revise the CAA requirement of a NAAQS review every five years for each criteria pollutant. There is legislation currently pending before Congress that would allow for a more realistic timeframe to complete NAAQS reviews, which the NAM supports.

The NAM appreciates the opportunity to provide comments on this important manufacturing issue. With balanced policies tied to rigorous and thorough processes, manufacturers in the United States will continue developing sustainable solutions that will fuel job creation, lower emissions and drive economic growth.

Sincerely,

Ross Eisenberg
Vice President
Energy and Resources Policy