

March 12, 2014

Dr. Holly Stallworth
Designated Federal Officer
Clean Air Scientific Advisory Committee - Ozone Review Panel

Via Electronic Mail
Re: Comments to CASAC on the Ozone NAAQS Policy Assessment

Dear Dr. Stallworth:

The Indiana Manufacturers Association appreciates the opportunity to provide comments on the Environmental Protection Agency's (EPA) reconsideration of the 2008 National Ambient Air Quality Standard (NAAQS) for ozone. Founded in 1901, The Indiana Manufacturers Association (IMA) is proud to serve as the leading voice for the manufacturing sector in Indiana. Our rich heritage as a manufacturing state compels us to contact you on this important subject.

The economy in the State of Indiana and the rest of the country has gained ground during this recent recovery period. Overly restrictive federal regulations such as the change in ozone NAAQS threaten that recovery and limit our overall prosperity in the future offering little gain in overall air quality and health benefit.

If the EPA is successful in implementing a new range of 60 parts per billion (ppb) to 70 ppb, vast amounts of the country will become "non-attainment" areas resulting in serious negative consequences. Large portions of Indiana would become non-attainment areas under the proposal. Proposals to expand or create new manufacturing facilities, which help the economy, will be deterred.

A perverse result could be that development of industrial sites are pushed further out from existing municipal areas, straining infrastructure and increasing the overall cost of production. Or worse, manufacturing opportunities could easily go overseas where there are perhaps much lower environmental standards.

The current level of 75 ppb has been found to be protective of human health. Many areas, including Indiana, have made great strides in improving air quality for multiple constituents. Moving the goal so soon after the last significant lowering is unadvisable and will be damaging to the economy.

In conclusion, the IMA recommends no change to the standard. However, if a change is made, the standard should include a range with 75 ppb. Thank you for your attention in this most important matter.

Sincerely,

/s/

Patrick J. Kiely
President