



Natural building blocks for quality of life

August 31, 2005

Mr. Ron Myers
U.S. Environmental Protection Agency
Emissions Factors & Policy Applications Group, C339-02
Research Triangle Park, NC 27711

Re: Technical Comments Concerning Proposed AP42 Emission Factor Improvement Program

Dear Mr. Myers:

The National Stone, Sand & Gravel Association (NSSGA) submits the enclosed technical comments concerning EPA's proposed revisions to the AP42 emission inventory program. These comments address the information provided in the document titled, "Emissions Factors Program Improvement Efforts" dated June 2005 prepared by Mactec Federal Programs, Inc. These comments are divided into three categories: (1) major comments concerning the Emission Factor Program Improvement Efforts, (2) recommendations concerning an effective approach to emission factor improvement, (3) technical comments generally applicable to the entire document, and (4) technical comments concerning the specific options discussed in the cover document and the issue papers included with the cover document.

NSSGA hopes these comments are helpful in EPA's review of the emission factor improvement program.

Sincerely,

A handwritten signature in black ink that reads "John S. Hayden".

John S. Hayden, PG, REM
Vice President, Environmental Services