



March 28, 2023

Re: Reconsideration of the National Ambient Air Quality Standards (NAAQS) for Particulate Matter (PM); EPA–HQ–OAR–2015–0072; submitted via regulations.gov

We represent construction materials vital to our nation’s infrastructure and are providing comments regarding the proposal by the U.S. Environmental Protection Agency (EPA) for Reconsideration of the National Ambient Air Quality Standards (NAAQS) for Particulate Matter (PM). Our organizations represent hundreds of thousands of employees across the country and include the National Stone, Sand & Gravel Association (NSSGA), National Asphalt Pavement Association (NAPA), National Ready Mixed Concrete Association (NRMCA), and the Portland Cement Association (PCA) (associations). Our members are committed stewards of the environment. As supporters of the Infrastructure Investment & Jobs Act (IIJA), we are concerned that this reconsideration of the PM standards will undermine this Administration’s infrastructure priorities.

We support EPA’s proposal to retain the primary and secondary NAAQS for PM10, and oppose the proposal to reduce the primary NAAQS standard for PM2.5. In particular:

- We agree with EPA that the science does not support lower PM10 standards, and they should be retained.
- The PM2.5 standard should not be reduced for the following reasons:
 - Imposes significant new burdens on business and state and local governments
 - Health impact data and risk estimates have not changed
 - Standards are unlikely achievable due to existing background levels
 - Controlling fugitive dust associated with producing construction materials will be cost-prohibitive
 - Potential loss of funding for roadway construction work

Reducing the PM2.5 standard would have minimal impact on air quality but create many burdens for industries like ours. If more areas fall into nonattainment as expected, federally supported highway and transit projects will not proceed in those nonattainment area unless the state can demonstrate that the project will cause no increase in PM2.5 emissions.

For these reasons, both the PM10 and PM2.5 standards should be retained. If finalized this proposal would negatively impact the goals of IIJA in improving our nation's infrastructure.

Sincerely,



Michele Stanley, Vice President of Government & Regulatory Affairs
National Stone, Sand & Gravel Association



Howard Marks, Vice President, Environment, Health & Safety
National Asphalt Pavement Association



Kevin Walgenbach, Senior Vice President of Compliance & Regulatory Affairs
National Ready Mixed Concrete Association



Sean O'Neill, Senior Vice President, Government Affairs
Portland Cement Association