



November 29, 2023

Dear Member of Congress,

On behalf of the National Stone, Sand & Gravel Association (NSSGA), the National Ready Mixed Concrete Association (NRMCA) and the Portland Cement Association (PCA), we write to you today regarding our deep concern over the proposed Environmental Protection Agency (EPA) particulate matter (PM) standard that is expected to lower the National Ambient Air Quality Standard (NAAQS) particulate matter standard (PM 2.5) from its current level of 12.0 micrograms per cubic meter of air ( $\mu\text{g}/\text{m}^3$ ) to within the range of 8.0 to 11.0  $\mu\text{g}/\text{m}^3$ .

The rule, proposed in January of 2023, allowed a 60-day public comment period, during which NSSGA, NRMCA and PCA each submitted comments outlining our concerns as well as a joint letter. The final rule is currently under interagency review by the White House Office of Management and Budget (OMB) and is likely to be completed by the year's end.

Reducing the proposed PM levels from 12  $\mu\text{g}/\text{m}^3$  to the proposed 8-11  $\mu\text{g}/\text{m}^3$  might appear small in theory, but its implementation would result in a significant shift, hindering the achievement of the Biden administration's core Infrastructure and Investment Jobs Act (IIJA) objectives. Complying with the lower standard would force U.S. manufacturers to reduce operational hours, decreasing construction material output and potentially leading to layoffs. This shortage could cause construction delays, impeding the administration's \$550 billion infrastructure overhaul. Furthermore, this move could shift opportunities for supplying building materials to overseas competitors due to stringent U.S. emissions regulations, potentially disadvantaging American manufacturers.

Professionals in the nation's construction industry actively prioritize environmental improvement and air quality. Over decades, the U.S. cement, concrete, and aggregates sectors have invested millions in advanced technologies to comply with EPA standards and produce eco-friendly products. Presently, the U.S. cement industry accounts for only 0.1 percent of the targeted PM emissions, and collaborative efforts between regulated industries and government authorities have already reduced PM emissions by 37 percent over the past two decades. This decline is set to persist through existing programs such as the EPA's PM standards.

Our industries heavily invest in sustainable products because society relies on these materials for essential construction. They aren't frivolous luxuries but the foundation of homes, sidewalks, roads, and bridges. Construction materials have shown resilience for centuries, and our industries persist in enhancing their sustainability, as we will always continue to do.

Introducing expensive new rules could harm the U.S. construction sector, boost sales for foreign competitors, and undermine the presidential administration's efforts that initially championed the IJIA. We are hoping the Proposed Reconsideration of the PM NAAQS will not be made final as proposed to ensure the construction materials industry is poised for consistent longevity and is able to continue utilizing IJIA to rebuild our nation's infrastructure.

Should you have any questions, please do not hesitate to contact any of our offices.



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