



U.S. Chamber of Commerce

Statement of the U.S. Chamber of Commerce

Public Comment before the Clean Air Scientific Advisory
Committee on the Review of the Draft Policy Assessment for the
Review of the National Ambient Air Quality Standards for
Particulate Matter

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Thank you for the opportunity to speak today regarding the external review draft of the Policy Assessment for the Reconsideration of the National Ambient Air Quality Standards (NAAQS) for Particulate Matter. I am Chad Whiteman and I am speaking on behalf of the U.S. Chamber of Commerce.

The Chamber supports air quality standards that are necessary to protect public health and welfare, and our members will take the appropriate measures that are required of them to attain and remain in attainment of those standards. We believe EPA's decision whether to maintain or revise the NAAQS should be based on a holistic policy judgment informed by an unbiased review of the latest scientific evidence.

Across decades of planning and investment, businesses have worked with EPA and their state partners to lower ambient concentrations of PM and other criteria pollutants. These emissions reductions have occurred while the U.S. economy, population, and energy use has steadily grown—undoubtedly a testament to successful collaboration between EPA, states, and industry to adopt new emissions control technologies and practices in a sound, cost-effective manner. EPA's 2020 Air Trends and National Emissions Inventory reports detail this progress. The reports show that annual PM_{2.5} concentrations have declined by 41 percent since 2000, driven by major emissions reductions from highway vehicles and the power sector. Total sulfur dioxide and nitrogen oxide emissions, which may contribute to the secondary formation of PM_{2.5} precursors under certain atmospheric conditions, were reduced by 85 percent and 53 percent, respectively, during this time period.

Briefly, I will describe why we suggest the CASAC provide all appropriate guidance to the EPA to deliver to the Administrator the information in the Policy Assessment to support his policy decision of either retaining the current NAAQS or recommending a modification. We recommend you insist that any basis to distinguish between NAAQS options are quantitatively identified. Associated uncertainties should be evaluated when discussing any projected benefits that could form the basis for either modification or retention of the NAAQS.

As a practical matter, it is important that CASAC recognize the potential direct and indirect economic impacts that can accompany more stringent NAAQS



requirements. NAAQS compliance has the potential to adversely affect jobs, business investment, and permitting in a broad range of important economic sectors and activities, even having impacts in areas of the country that are in attainment with the standards. For the 2012 PM NAAQS revisions, EPA estimated annualized costs of up to \$412 million per year (in 2019 dollars) were necessary to comply with these requirements. For the areas already classified as non-attainment under the 2012 PM NAAQS, any lowering of the PM NAAQS would layer on additional requirements on top of existing regulatory requirements, some of which have compliance dates stretching out past 2025.

Section 109(d) of the Clean Air Act requires CASAC to advise the Administrator on any adverse public health, welfare, social, economic or energy effects that may result from attainment and maintenance of such NAAQS. Any recommended revision to the NAAQS should consider the overall impact on economic growth and jobs, in particular, for increasingly larger incremental revisions to the NAAQS. While the Supreme Court has ruled on the question of the consideration of economic costs when establishing new NAAQS, there is no contradiction between the prohibition on considering costs in setting standards and providing critical advice to the EPA Administrator about negative economic or public welfare effects that may result from efforts to attain new standards.

Current tools to address NAAQS are being pushed to the limits as new, more stringent air standards are moved closer to background concentrations of criteria pollutants. The role of background PM in the NAAQS is of growing importance in regions throughout the country. The margin between background PM concentrations and the NAAQS is shrinking, leaving little space for reasonable economic growth and incrementally increasing the costs of compliance.

Natural background sources of PM are also an important consideration due to the variety of sources contributing such as dust from the wind erosion of natural surfaces, sea salt, wildland fires, bacteria and pollen, to name a few. As noted in the draft Policy Assessment, dust storms such as the one that affected Phoenix in 2011 caused peak PM10 concentrations greater than 5,000 ug/m³. Dust combined with fires comprise 59 percent of national PM2.5 emissions, far greater than major sectors such as stationary fuel combustion (11 percent), mobile sources (5 percent), and industrial processes (5 percent). The lower the ambient PM standards, the more significant the



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PM contributions from exceptional events such as prescribed fires and wildfires become will have.

In addition to domestic emissions from fires, PM emissions from other countries can be transported to the U.S. Transport of smoke from fires in Canada, Mexico, Central America, and Siberia have been documented in multiple studies. According to EPA's National Emissions Inventory, wildfire smoke contributes between 10 to 20 percent of primary PM emissions in the U.S. per year, with much higher localized contributions near fire-affected areas. With the frequency and longevity of the fire season growing, larger amounts of particles and gaseous PM precursors are expected to result.

Considerable progress is continuing to be made in reducing PM emissions from commercial activities. With growing contributions from exception events and natural background emissions, we suggest CASAC place considerable weight on these factors when making their recommendation to the Administrator. Coupled with growing uncertainty of the effects from increasingly lower ambient PM concentrations, the potential dampening of economic growth across a broad swath of the economy in light of this uncertainty is concerning. For these reasons and the others stated previously, the Chamber recommends CASAC encourage the Administrator to seriously consider the option of retaining the current NAAQS.

Thank you for the opportunity to provide our comments.