

The Honorable Administrator Scott Pruitt  
US Environmental Protection Agency  
1200 Pennsylvania Ave, NW  
Washington, DC 20004

September 6, 2017

Dear Administrator Pruitt:

As associations representing many businesses, both large and small, that employ millions of Americans, and local governments in which those businesses thrive, we are deeply concerned about the harmful impact that the Environmental Protection Agency's (EPA) 2015 rule, to make ozone standards the most stringent ever, could have on the economy. The EPA's current regulations are working, air quality continues to improve, and the United States is leading the world in reducing emissions. Implementation of the new ozone standards could significantly damage the economy by imposing unachievable emissions limits and reduction targets on almost every part of our country, including rural and undeveloped areas. Therefore, we strongly urge you to expeditiously reconsider the 2015 ozone standards.

We all value clean air. The managers and employees of the companies we represent, as well as their families, all breathe the same air. We are proud that emissions of ozone-forming compounds have been cut in half since 1980, leading to a 33% drop in ozone concentrations. Moreover, EPA issued the guidance to states just two years ago to implement the 2008 ozone standards. The country can expect to see even greater reductions in ground-level ozone as states make up lost ground in putting those standards into effect.

Indeed, states and businesses are currently committing substantial resources – both in time and money – towards achieving emissions reductions under those 2008 ozone standards. Despite over three decades of cleaner air and before states can catch up with EPA's delays in implementing existing ozone standards, EPA finalized tighter standards of 70 parts per billion that could bring additional areas of the country into nonattainment. Local communities could face burdens to commercial and industrial activity not only vital to creating jobs, but also to providing tax revenue that supports important local services like public safety and education. Unless addressed soon, the rule's hardship to the American worker could be real and immediate. Furthermore, approximately half of the states across the nation have indicated their concerns with tightening the standards.

If implemented, EPA's stringent ozone standards could limit business expansion in many areas of the United States and risk the ability of U.S. companies to create new jobs. The standards add red tape to companies seeking to grow even in areas that can attain those standards. The Clean Air Act carries even stiffer consequences for nonattainment areas, which can directly impact economic vitality of local communities and make it difficult to attract and develop business. Increased costs associated with restrictive and expensive permit requirements could likely deter companies from siting new facilities in a nonattainment area, making the United States a less attractive place to do business and risking shipping jobs overseas.

Companies building a new facility or performing major modifications to certain existing facilities resulting in increased ozone concentrations in, or near, a nonattainment area will be required

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to meet the most stringent Clean Air Act standards by installing the most effective emission reduction technology regardless of cost. As well, states are mandated to offset any ozone-forming emissions from new projects or projects undergoing major modifications by reducing emissions from other existing sources in a nonattainment area. If no party is willing to provide offsets, then the project cannot go forward. This offset requirement can be a 2-to-1 ratio in certain situations. Nonattainment designation also has profound impact on infrastructure development vital to the business community. Beginning one year from the date of the nonattainment designation, federally-supported highway and transit projects cannot proceed in a nonattainment area unless the state can demonstrate that the project will cause no increase in ozone emissions.

These restrictions do not disappear when an area finally comes into attainment. Instead, former nonattainment areas face a legacy of EPA regulatory oversight. Before a nonattainment area can be redesignated to attainment, EPA must receive and approve an enforceable maintenance plan for the area that specifies measures providing continued maintenance of ozone standards and contingency measures to be implemented promptly if an ozone standard is violated.

Against these economic consequences, scientific uncertainties regarding the benefits of the stringent ozone standards are significant. Indeed, stringent ozone standards may have severe unintended consequences for public health. Studies show that by increasing the costs of goods and services such as energy, and decreasing disposable incomes, regulation can inadvertently harm the socio-economic status of individuals and, thereby, contribute to poor health and premature death. As representatives of businesses providing needed jobs in our communities, as well as the community leaders themselves, we believe these scientific uncertainties should be better explored in order to best allocate resources in a manner that strengthens both the economy and the environment.

The air is getting cleaner and the 2008 ozone standards need an opportunity to work. Therefore, in light of the potential economic hardship, and uncertain benefits related to the stringent ozone standards, we call on EPA to expeditiously reconsider the 2015 ozone standards.

Sincerely,

Alabama Energy Institute  
Alabama Petroleum Council  
Alabama Pulp & Paper Council  
Business Council of Alabama  
Manufacture Alabama  
Mobile Area Chamber of Commerce  
AGC Arkansas  
Agricultural Council of Arkansas  
ARBEV  
Arkansas Asphalt Pavement Association  
Arkansas Automobile Dealers Association  
Arkansas Environmental Federation  
Arkansas Farm Bureau  
Arkansas Forest and Paper Council  
Arkansas Forestry Association

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Arkansas Hospitality Association  
Arkansas Independent Producers and Royalty Owners Association  
Arkansas Oil Marketers Association  
Arkansas Petroleum Council  
Arkansas Ready Mixed Concrete Association  
Arkansas State Chamber of Commerce/Associated Industries of Arkansas  
Arkansas Timber Producers Association  
Arkansas Trucking Association  
Associated Builders and Contractors of Arkansas  
Colorado Association of Commerce & Industry  
Colorado Association of Mineral Royalty Owners  
Colorado Cattlemen's Association  
Colorado Dairy Farmers  
Colorado Farm Bureau  
Colorado Motor Carriers Association  
Colorado Petroleum Association  
Colorado Petroleum Council  
Grand Junction Area Chamber of Commerce  
Connecticut Bus Association  
Connecticut Business & Industry Association  
Connecticut Energy Marketers Association  
Connecticut Petroleum Council  
Connecticut School Transportation Association  
Gasoline and Automotive Service Dealers of America  
Associated Industries of Florida  
Florida Automobile Dealers Association  
Florida Chamber of Commerce  
Florida Forestry Association  
Florida Natural Gas Association  
Florida Natural Gas Vehicle Coalition  
Florida Petroleum Council  
Florida Propane Gas Association  
Florida Restaurant and Lodging Association  
Florida State Hispanic Chamber of Commerce  
Florida Transportation Builders' Association  
The James Madison Institute  
Associated General Contractors of Georgia  
Georgia Agribusiness Council  
Georgia Asphalt Pavement Association  
Georgia Association of Convenience Stores  
Georgia Association of Manufacturers  
Georgia Chamber of Commerce  
Georgia Chemistry Council  
Georgia Concrete Contractors Association  
Georgia Construction Aggregate Association  
Georgia Electric Membership Corporation

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Georgia Farm Bureau  
Georgia Food Industry Association  
Georgia Highway Contractors Association  
Georgia Mining Association  
Georgia Motor Trucking Association  
Georgia Oilmen's Association  
Georgia Paper and Forest Products Association  
Georgia Petroleum Council  
Georgia Poultry Federation  
Georgia Railroad Association  
Georgia Ready Mixed Concrete Association  
Metro Atlanta Chamber  
Oglethorpe Power Corporation  
Chemical Industry Council of Illinois  
Grain and Feed Association of Illinois  
Illinois Association of Aggregate Producers  
Illinois Association of Convenience Stores  
Illinois Association of County Engineers  
Illinois Coal Association  
Illinois Farm Bureau  
Illinois Manufactures Association  
Illinois Oil and Gas Association  
Illinois Petroleum Council  
Illinois Petroleum Marketers Association  
Illinois Retail Merchants Association  
Illinois Trucking Association  
Mid-West Truckers Association  
Operators Engineers Local 150  
Agribusiness LLC  
AIM-Accelerating Indiana Municipalities  
APPIAN  
Association of Indiana Counties  
Construction Advancement Foundation of Northwest Indiana, Inc  
CountryMark  
Greater Elkhart Chamber  
H&C Climate Control  
Hendricks County Commissioner Matt Whetstone  
Indiana Builders Association  
Indiana Cast Metal Association  
Indiana Chamber of Commerce  
Indiana Coal Council  
Indiana Electric Cooperatives  
Indiana Grocery and Convenience Store Association  
Indiana Manufactured Housing Association  
Indiana Manufacturers Association  
Indiana Motor Truck Association

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Indiana Oil and Gas Association  
Indiana Petroleum Council  
Indiana Petroleum Marketers and Convenience Store Association  
Indiana Retail Council  
Indiana Utility Shareholders Association  
Indy Chamber  
Recreation Vehicle Indiana Council  
Southwest Chamber  
American Council of Engineering Companies of Iowa  
Associated General Contractors of Iowa  
Iowa Association of Business and Industry  
Iowa Engineering Society  
Iowa Good Roads Association  
Iowa Motor Truck Association  
Master Builders of Iowa  
Society of Land Surveyors of Iowa  
CVR Energy  
Kansas Agribusiness Retailers Association  
Kansas Chamber of Commerce  
Kansas Farm Bureau  
Kansas Grain & Feed Association  
Kansas Independent Oil & Gas Association  
Kansas Manufacturing Council  
Kansas Petroleum Council  
Renew Kansas Ethanol Association  
Maine State Chamber of Commerce  
Maryland Chamber of Commerce  
Maryland Farm Bureau  
Maryland Highway Users Federation  
Maryland Motor Truck Association  
Maryland Petroleum Council  
Maryland Retailers Association  
Maryland Transportation Builders and Materials Association  
Mid-Atlantic Petroleum Distributors Association  
Service Station Dealers of America and Allied Trades \*  
Tire Industry Association \*  
WMDA Service Station and Automotive Repair Association  
Massachusetts Energy Marketers Association  
Massachusetts Petroleum Council  
Massachusetts Petroleum Council  
New England Convenience Store & Energy Marketers Association  
Associated Food and Petroleum Dealers of Michigan  
Associated Petroleum Industries of Michigan  
Grand Rapids Chamber of Commerce  
Michigan Aggregates Association  
Michigan Electric and Gas Association

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Michigan Farm Bureau  
Michigan Infrastructure and Transportation Association  
Michigan Manufacturers Association  
Michigan Oil and Gas Association  
Cooperative Network Minnesota  
Minnesota Chamber of Commerce  
Minnesota Grocers Association  
Minnesota Petroleum Council  
Minnesota Trucking Association  
MN AgriGrowth Council  
MN Petroleum Marketers Association  
Associated General Contractors of Missouri  
Associated Industries of Missouri  
Association of Missouri Electric Cooperatives  
Chemistry Council of Missouri  
County Commissioners Association of Missouri  
Empire Springfield Grocers Association  
Mid-America Grocers Association  
Mining Industry Council of Missouri  
Missouri Asphalt Pavement Association  
Missouri Association of Counties  
Missouri Chamber of Commerce  
Missouri Chapter of Freedom of the Road Riders  
Missouri Concrete Association  
Missouri Energy Development Association  
Missouri Farm Bureau  
Missouri Forest Products Association  
Missouri Grocers Association  
Missouri Limestone Association  
Missouri Municipal League  
Missouri Petroleum Council  
Missouri Petroleum Marketers & Convenience Store Association  
Missouri Retailers Association  
Missouri Tire Dealers and Retreaders Association  
Missouri Transportation & Development Council  
Missouri Trucking Association  
North East County Commissioners Association of Missouri  
North West County Commissioners Association of Missouri  
Regulatory Environmental Group for Missouri  
SITE Improvement Association  
South Central County Commissioners Association of Missouri  
South East County Commissioners Association of Missouri  
South West County Commissioners Association of Missouri  
West Central County Commissioners Association of Missouri  
Nebraska Farm Bureau Federation  
Nebraska Petroleum Marketers & Convenience Store Association

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Nebraska Petroleum Producers Association  
Nebraska State Chamber of Commerce & Industry  
Nebraska Trucking Association  
Business & Industry Association of New Hampshire  
New Hampshire Motor Transport Association  
New Jersey Petroleum Council  
API New York  
Carolinas Associated General Contractors (NC & SC)  
North Carolina Petroleum & Convenience Marketers Association  
North Carolina Petroleum Council  
Associated General Contractors of North Dakota  
Bismarck-Mandan Chamber of Commerce  
Greater North Dakota Chamber of Commerce  
North Dakota Petroleum Council  
North Dakota Petroleum Marketers Association  
North Dakota Propane Gas Association  
North Dakota Retail Association  
Utility Shareholders of North Dakota  
API Ohio  
Canton Regional Chamber of Commerce  
International Union of Operating Engineers, Local 18  
Ohio Aggregates & Industrial Minerals Association  
Ohio Chamber of Commerce  
Ohio Chemistry Technology Council  
Ohio Coal Association  
Ohio Contractors Association  
Ohio Gas Association  
Ohio Grocers Association  
Ohio Home Builders Association  
Ohio Licensed Beverage Association  
Ohio Manufacturers' Association  
Ohio Municipal League  
Ohio Oil and Gas Association  
Ohio Petroleum Marketers & Convenience Store Association  
Ohio Trucking Association  
Ohio's Electric Cooperatives  
Plumbers & Pipefitters Local 396  
Southeastern Ohio Oil and Gas Association  
Youngstown/Warren Regional Chamber  
ARIPPA  
Associated Pennsylvania Constructors  
Associated Petroleum Industries of Pennsylvania  
Chamber Of Commerce For Greater Philadelphia  
Greater Pittsburgh Chamber of Commerce  
Manufacturer and Business Association  
Maritime Exchange for the Delaware River and Bay

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Pennsylvania Aggregates and Concrete Association  
Pennsylvania Chemical Industry Council  
Pennsylvania Coal Alliance  
Pennsylvania Farm Bureau  
Pennsylvania Food Merchants Association  
Pennsylvania Forest Products Association  
Pennsylvania Independent Oil and Gas Association  
Pennsylvania Manufacturers Association  
Pennsylvania Petroleum Association  
Pennsylvania Waste Industries Association  
The Energy Council of Rhode Island  
API South Carolina  
South Dakota Chamber of Commerce and Industry  
South Dakota Electric Utility Companies  
South Dakota Petroleum and Propane Marketers Association  
South Dakota Retailers Association  
Tennessee Fuel and Convenience Store Association  
Tennessee Petroleum Council  
Vermont Fuel Dealers Association  
Vermont Petroleum Association  
Vermont Retail and Grocers Association  
American Council of Engineering Companies of Virginia  
Associated General Contractors of Virginia  
LiUNA! Laborers' Local 11  
Precast Concrete Association of Virginia  
Thomas Jefferson Institute for Public Policy  
Virginia Agribusiness Council  
Virginia Automobile Dealers Association  
Virginia Chamber of Commerce  
Virginia Coal & Energy Alliance  
Virginia Farm Bureau  
Virginia Forest Products Association  
Virginia Forestry Association  
Virginia FREE  
Virginia Manufacturers Association  
Virginia Oil and Gas Association  
Virginia Petroleum Council  
Virginia Petroleum, Convenience and Grocery Association  
Virginia Poultry Federation  
Virginia Retail Merchants Association  
Virginia Transportation Construction Alliance  
Virginia Trucking Association  
Associated Builders & Contractors of WI  
Cooperative Network of Wisconsin  
Midwest Food Products Association  
Milwaukee Metropolitan Association of Commerce



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Wisconsin Transportation Builders Association

Transportation Development Association of Wisconsin

Wisconsin Auto & Truck Dealers Association

Wisconsin Grocers Association

Wisconsin Housing Alliance

Wisconsin Industrial Energy Group

Wisconsin Manufacturers & Commerce

Wisconsin Motor Carriers Association

Wisconsin Paper Council

Wisconsin Petroleum Council

Wisconsin Petroleum Marketers & Convenience Stores Association