

BIG POLLUTERS OPPOSE PARTICLE POLLUTION STANDARDS THAT WOULD PROTECT PUBLIC HEALTH

What Industry Has Said – and What It Is Saying -- About Proposed EPA Standards for Particle Pollution

- "The proposal is not grounded in sound science, and because the current standard has not even been implemented, changing the standard now would move the goalposts in the middle of the game, creating investment and business uncertainty. This is not the time to impose excessive new business burdens on U.S. manufacturers facing unprecedented competition from abroad." – *John Engler, CEO, National Association of Manufacturers, Jan. 19, 2006*
- "New PM [particle pollution] standards may be premature in that EPA and the states are just now implementing the PM revisions from 1997... It is hard to see the justification for ratcheting the national PM standard lower at this point." – *Scott Segal, Electric Reliability Coordinating Council, Dec. 20, 2005*
- "The information gathered and presented by EPA staff to the Administrator and the agency's science advisors has been highly selective, downplaying or ignoring studies that fail to support tightening the standards." – *Edison Electric Institute, Dec. 20, 2005*
- "Regulations to implement more stringent standards, if that's the path EPA ultimately chooses, may yield limited, if any, tangible benefit to public health. Yet the economic costs imposed on the states will be very real, with the creation of many new nonattainment areas that can hurt local businesses, drive away new ones, and inflict severe penalties on areas unable to quickly reach compliance." – *Edison Electric Institute, Dec. 21, 2005*
- "APPA [American Public Power Association] is a member of UARG [Utility Air Regulatory Group]. UARG will file extensive comments... We intend to file "me too" comments on the proposed revisions and place some emphasis on speciation in 2006. – *American Public Power Association, January 2006*
- "The studies in question show an extremely small association between ambient PM levels and health impacts – so small, in fact, that they are

dwarfed by the analyses' inherent uncertainties. It is analogous to an early election-night poll that shows one candidate with a 50.0% to 49.8% lead and a margin of error of +/- 3.0% It would be nonsensical in such a situation to predict the outcome." – *Kyle Isakower, Manager, Environment Policy, American Petroleum Institute, January 2006*

- "We do not believe that these more stringent standards are justified by the current science." -- *Ad Hoc Group of industries, including the American Chemistry Council, the American Forest and Paper Association, the American Iron and Steel Institute, the American Petroleum Institute, American Trucking Associations, the Council of Industrial Boiler Owners, Edison Electric Institute, the Engine Manufacturers Association, the National Association of Manufacturers, the National Petrochemical and Refiners Association, the Portland Cement Association, and the U.S. Chamber of Commerce. (March 2005)*
- "The totality of current epidemiological knowledge fails to support a conclusion that there are adverse health effects associated with current ambient levels of particulate matter." -- *U.S. Chamber of Commerce, July 2004*
- "EPA should not establish an Urban Coarse Particle Standard for the following reasons. First, and most importantly, there is no adequate scientific or technical basis to distinguish between urban and rural coarse particles... An UPM_{10-2.5} standard [coarse particle standard for urban areas] as described in the Staff Paper is not justified, is completely arbitrary in its designation and implementation, and has not received the required public review." – *Alliance of Automobile Manufacturers and Engine Manufacturers Association, October 3, 2005*
- "It would be entirely consistent [with EPA's review of the science] for EPA to repeal the current [coarse particle standard] without replacement... If EPA proposes a standard despite the weakness of the available evidence, it is imperative that EPA formulate a defensible and effective exclusion for mining, agricultural and other emissions for which there is no evidence of harm." – *The Coarse Particle Coalition, Dec. 15, 2005*
- "In order to establish a standard under the NAAQS, there must be evidence of adverse health effects. Such evidence does not exist [for a coarse particle standard]" – *National Cattlemen's Beef Association, Jan 20, 2006.*

- “Thanks to NCBA [National Cattlemen’s Beef Association] efforts, EPA has agreed to exclude agriculture dust from the standard at this time. But NCBA remains concerned about implementation of the rule and where EPA plans to locate monitors to ensure that agriculture dust does not get caught up in the regulatory framework... We have fought hard to convince the EPA to hold off on establishing a coarse PM standard until such evidence of adverse health effects is available. In response to our concerns, EPA agreed to accept comments on not adopting a standard at this time. –*National Cattlemen’s Beef Association, Dec. 22, 2005*
- “The National Corn Growers Association (NCGA) discourages a coarse particulate matter standard be established by the U.S. Environmental Protection Agency (EPA) until sound scientific research justifies such a health-based standard.” -- *National Corn Growers Association, January 4, 2006*
- "NSSGA [The National Stone Sand and Gravel Association] has fought vigorously to get this exemption for mining sources from the [particle] standard. We will continue to press EPA during the comment period for a full exemption for our sources in both urban and rural areas." – *National Stone Sand and Gravel Association, January 4, 2006*
- “The existing standard is already too stringent. We're already in the realm of excessive and unjustified regulation.” – *Ben Leiberman, The Heritage Foundation, February 1, 2006.*