



America's Cement Manufacturers™

Portland Cement Association

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A. Todd Johnston

Executive Vice President of
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May 11, 2016

The Honorable Fred Upton
Chairman
Committee on Energy & Commerce
2183 Rayburn House Office Building
Washington, DC 20515

The Honorable Frank Pallone
Ranking Member
Committee on Energy & Commerce
237 Cannon House Office Building
Washington, DC 20515

Dear Chairman Upton and Ranking Member Pallone:

The Portland Cement Association (PCA) appreciates your attention to the longstanding problems associated with the review and implementation of the Clean Air Act's National Ambient Air Quality Standards (NAAQS). In particular, PCA supports Committee consideration of the *Ozone Standards Implementation Act of 2016* (H.R. 4775) and its thoughtful approach to implementing the recently revised standards for ozone as well as future NAAQS. The proposed revisions will improve a program that has long been mired by overlapping and unnecessarily punitive regulatory requirements.

Founded in 1916, PCA is the widely-recognized authority on the technology, economics, and applications of cement and concrete. PCA represents more than 92% of U.S. cement manufacturing capacity. The Association's members own and operate manufacturing facilities in 33 states and distribution terminals in every state. The cement industry employs over 13,000 people and contributes to the creation of hundreds of thousands of jobs in related industries, including concrete.

The current five-year review cycle for NAAQS is too short and results in overlapping requirements for existing and new standards. This often unnecessarily penalizes states and manufacturers as they work to lower emissions. Plagued by bureaucratic delays, implementation is often not complete before the review process starts again. Such is the case with the 2015 ozone NAAQS. EPA lowered the NAAQS to 70 parts per billion (ppb) only months after it released guidance on how to implement the prior 2008 standards at 75 ppb.

Revising the implementation timeline for the 2015 ozone standards would ameliorate regulatory burdens without compromising the program's health objectives. Indeed, EPA's own data show that even without new regulations to implement the 2015 standards, ozone levels will fall below 70 ppb in less than ten years. At the same time, this would provide meaningful relief to cement manufacturers and the communities where they are located. Without this change, more than half

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of areas where cement manufacturing facilities are located may be designated as “nonattainment,” threatening jobs and deterring economic development.

On behalf of the Portland Cement Association, thank you for your attention to this important issue regarding the burdens of NAAQS review and implementation, particularly as it relates to ozone. Should you have any questions or need any additional information, please contact Rachel Derby, PCA’s Vice President of Government Affairs (202-679-8223; rderby@cement.org).

Sincerely,

A handwritten signature in black ink, appearing to read "A. Todd Johnston". The signature is fluid and cursive, with the first name being the most prominent.

A. Todd Johnston
Executive Vice President, Government Affairs

cc: United States House of Representatives