



Industrial Energy Consumers of America

The Voice of the Industrial Energy Consumers

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June 19, 2020

Dr. Scott Jenkins
U.S. Environmental Protection Agency
OAQPS (Mail Code: C539-02)
Research Triangle Park, NC 27711

Re: Review of the National Ambient Air Quality Standards for Particulate Matter, Docket No. EPA-HQ-OAR-2015-0072

Dear Dr. Jenkins:

On behalf of the Industrial Energy Consumers of America (IECA), we support EPA's proposal to retain both the primary and secondary particulate matter (PM) standards, without revision. In determining this decision, it is our understanding that you have considered all of the available scientific evidence assessed in the Integrated Science Assessment, analyses in the Policy Assessment, and the advice from the Clean Air Scientific Advisory Committee. It is also our understanding that significant uncertainties in the scientific evidence drive the decision to propose retaining the standards. This decision upholds the requirements of the Clean Air Act to set standards at levels requisite to protect public health, i.e. neither too high nor too low.

Considering the uncertainties in the scientific evidence, we support the future regular reviews of the evidence for health effects and potential future adjustments to the standard, accordingly, under the terms of the Clean Air Act calling for regular review of National Ambient Air Quality Standards.

Sincerely,

Paul N. Cicio
President

The Industrial Energy Consumers of America is a nonpartisan association of leading manufacturing companies with \$1.1 trillion in annual sales, over 4,200 facilities nationwide, and with more than 1.8 million employees worldwide. It is an organization created to promote the interests of manufacturing companies through advocacy and collaboration for which the availability, use and cost of energy, power or feedstock play a significant role in their ability to compete in domestic and world markets. IECA membership represents a diverse set of industries including: chemicals, plastics, steel, iron ore, aluminum, paper, food processing, fertilizer, insulation, glass, industrial gases, pharmaceutical, building products, automotive, brewing, independent oil refining, and cement.