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RE: United Steelworkers comments on Environmental Protection Agency's Proposed Rule on "Reconsideration of the National Ambient Air Quality Standards for Particulate Matter" (EPA-HQ-OAR-2015-0072).

To Whom It May Concern:

I write to you on behalf of the United Steelworkers Union (USW or Steelworkers), the largest industrial union in North America. We appreciate the opportunity to provide insight and comments on the Environmental Protection Agency's (EPA) proposed rule regarding the Reconsideration of the National Ambient Air Quality Standards (NAAQS) for Particulate Matter (PM_{2.5}).

Our union has a vital interest in this rulemaking as we are the primary union for workers in utilities and large industries, including in steel and ferroalloy; glass; cement; chemical; and pulp, paper, and paperboard manufacturing. USW-represented jobs are high-paying with robust benefits.

We strongly support reasonable and well-researched regulations to ensure that we have clean air and water, and that communities are protected. Of course, workers inside facilities are the most impacted from exposure to pollution. However, there will be implications for the sectors we represent, and for our members' jobs if regulations are not fully vetted and sized. In regard to the reconsideration of NAAQS for PM_{2.5}, we would strongly encourage that EPA should defer NAAQS changes until a detailed implementation plan is vetted.

Current Environmental Trends

Our union is extremely proud that our nation enjoys some of the cleanest air in the world today.¹ Ambient air levels of PM_{2.5} have been trending downward over the

¹ [World Health Organization](https://www.who.int/news-room/fact-sheets/detail/ambient-air-pollution-and-health-effects), "SDG Indicator 11.6.2 Concentrations of fine particulate matter (PM_{2.5})", Accessed March 28, 2023.

past 20 years.² This trend will continue with major investments in our nation’s industrial sectors through the Inflation Reduction Act (IRA) and the Infrastructure Investment and Jobs Act (IIJA).

We would also emphasize that the current U.S. emissions inventory indicates that the industrial and energy sector are small contributors to PM2.5 ambient air quality and that natural sources – such as fires, fugitive dust, and agriculture sources – are the dominant contributor.³ Unfortunately, this current proposal does not account for these sources at all.

Implementation Concerns

Our union has concerns regarding the implementation of the proposed new NAAQS for PM2.5. We believe that EPA must develop rules on how the standard would be implemented in practice by federal or state programs because industrial sources rely on the implementation rules to know how to demonstrate compliance. State agencies and the regulated community need time to plan for the lower standard, especially given that a range was proposed rather than a specific number.⁴ Otherwise, major projects in the pipeline must be reviewed, and may be thwarted, since the lower standard becomes effective immediately. The EPA and state governments should be partners in innovative NAAQS implementation strategies.

Impact on Offshoring

EPA should also avoid finalizing a rule with a timeline that would cause facilities to close and lay off workers as NAAQS puts a cap on U.S. industries. The industries in question are trade exposed, and must compete in a global market where cost pressures are significant, particularly given the current global economic changes in recent years from the COVID-19 pandemic to Russia’s invasion of Ukraine.

Additionally, as mentioned above, our nation has one of the strongest environmental protection regimes for large industries, and we must not incentivize companies to offshore production due to requirements that have not been properly vetted. Our union believes that we can continue to make positive and effective change to protect workers and make our communities safer, but we must work together to ensure that regulations to promote environmental stewardship do not create devastatingly heavy burdens.

² [U.S. Environmental Protection Agency](#), “Particulate Matter (PM2.5) Trends”, August 1, 2022.

³ [U.S. Environmental Protection Agency](#), “2017 National Emissions Inventory Report”, Accessed March 28, 2023.

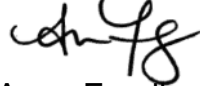
⁴ [U.S. Environmental Protection Agency](#), “NAAQS Implementation Process”, July 8, 2022.

Conclusion

USW appreciates the opportunity to comment on this proposed rule impacting our nation's energy and manufacturing sectors. We strongly encourage EPA to defer NAAQS changes until a detailed implementation plan is vetted. EPA should carefully consider the costs and benefits of the proposed NAAQS for PM2.5 for large industries, including analyzing other sources of PM2.5 emissions, allowing time for major investments through the IRA and IIJA to take effect, weighing the burden to states for implementation without a vetted plan, and understanding the incentives this proposal give industries to offshore production.

We look forward to a continued dialogue with EPA on this proposed rule, and thank you again for the opportunity to comment.

Sincerely,



Anna Fendley

Director of Regulatory and State Policy