

July 18, 2017

The Honorable Mitch McConnell
Majority Leader
United States Senate
Washington, D.C. 20510

The Honorable Paul Ryan
Speaker
United States House of Representatives
Washington, D.C. 20515

The Honorable Chuck Schumer
Minority Leader
United States Senate
Washington, D.C. 20510

The Honorable Nancy Pelosi
Minority Leader
United States House of Representatives
Washington, D.C. 20515

Dear Majority Leader McConnell, Speaker Ryan, and Minority Leaders Schumer and Pelosi:

The undersigned, which represent a diverse group of industries from across the country, write to express our strong support for H.R. 806 and S. 263, the “Ozone Standards Implementation Act of 2017.” This legislation provides a common-sense approach for implementing national ambient air quality standards, recognizes ongoing state efforts to improve air quality through a reasonable implementation schedule for the 2015 ozone standards, streamlines the air permitting process for businesses to expand operations and create jobs, and includes other reforms that bring more regulatory certainty to federal air quality standards. Additionally, the undersigned support language including certain elements of H.R. 806 and S. 263 included in the Fiscal Year 2018 Interior, Environment and Related Agencies Appropriations bill.

We have significant concerns that the 2015 ozone standards overlap with existing state plans to implement the 2008 ozone standards, leading to duplicative and wasteful implementation schedules, and unnecessary and severe economic impacts. The new ozone standards were promulgated in October 2015, only months after states received their final guidance from the Environmental Protection Agency (EPA) on how to implement the 2008 ozone standards. This delay was the result of the Obama administration’s decision to halt work on the 2008 ozone standards during a 2010-2011 reconsideration period. The EPA, however, did not account for this self-imposed delay when issuing the 2015 ozone standards, thereby imposing duplicative costs and burdens of implementing multiple standards simultaneously. This is particularly wasteful as the EPA itself projects that nearly the entire country would attain the 2015 ozone standards simply by being provided an opportunity to fully implement already-planned measures like their state implementation plans for the 2008 ozone standards. Local economies also face severe impacts, as analysis of data indicates that the 2015 ozone standards could expand nonattainment to more than 950 counties if planned reductions are not allowed time to take effect, subjecting large parts of the country to costly nonattainment control requirements.

Notwithstanding concerns expressed by thousands of elected officials, state agencies, businesses, community groups, and other stakeholders, the EPA issued the 2015 ozone standards without addressing the overlap with the 2008 ozone standards and the enormous impacts that dual implementation would have on limited state resources, permitting, and the economy. It is now up

to Congress to address these issues, and that is why we support H.R. 806 and S. 263. By better aligning the 2015 ozone standards with the 2008 ozone standards and their associated emissions reductions, H.R. 806 and S. 263 will help prevent unnecessary nonattainment designations and cost burdens, without sacrificing environmental protection. The legislation's permitting relief and other reforms are also an important step towards national ambient air quality standards that balance environmental protection and economic development.

In sum, H.R. 806 and S. 263 and the related appropriations language provide a common-sense plan that maintains continued air quality improvement without unnecessarily straining state and local economic resources.

We strongly encourage Congress to act quickly on this critical legislation.

Alabama Petroleum Council	Ardagh Group, Glass North America
Alaska Chamber	Arizona Chamber of Commerce and Industry
Alliance of Automobile Manufacturers	Arizona Mining Association
Alliance of Wyoming Manufacturers	Arkansas Petroleum Council
Aluminum Association	Ascension Chamber of Commerce
American Chemistry Council	Associated Petroleum Industries of Michigan
American Coatings Association	Associated Petroleum Industries of Pennsylvania
American Coke and Coal Chemicals Institute	Association of American Railroads
American Farm Bureau Federation	Baton Rouge Area Chamber
American Forest & Paper Association	Buckeye Valley Chamber of Commerce
American Fuel & Petrochemical Manufacturers	Cedar City Area Chamber of Commerce
American Iron and Steel Institute	Chemical Industry Council of California
American Petroleum Institute	Chemical Industry Council of Illinois
American Road & Transportation Builders Association (ARTBA)	Chemistry Council of New Jersey
American Wood Council	Colorado Association of Commerce & Industry
Anderson Area Chamber of Commerce	Colorado Oil & Gas Association
API New York	Colorado Petroleum Association
API Ohio	Colorado Petroleum Council
API South Carolina	

Colorado Wyoming Petroleum Marketers Association
Connecticut Petroleum Council
Consumer Energy Alliance
Consumer Specialty Products Association
Council of Industrial Boiler Owners (CIBO)
CVR Energy, Inc.
Delaware Petroleum Council
Fashion Jewelry & Accessories Trade Association
Flexible Packaging Association
Florida Petroleum Council
Georgia Chemistry Council
Georgia Petroleum Council
Gilbert Chamber of Commerce
Glass Packaging Institute (GPI)
Global Cold Chain Alliance
GPA Midstream Association
Grand Rapids Area Chamber of Commerce
Greater Bakersfield Chamber of Commerce
Greater Baton Rouge Industry Alliance, Inc.
Greater Cheyenne Chamber of Commerce
Greater Coachella Valley Chamber of Commerce
Greater Flagstaff Chamber of Commerce
Greater North Dakota Chamber of Commerce
Greater Phoenix Chamber of Commerce
Greater Pittsburgh Chamber of Commerce
Illinois Petroleum Council

Independent Petroleum Association of America
Indiana Petroleum Council
Industrial Energy Consumers of America (IECA)
Industrial Environmental Association
Industrial Minerals Association - North America
Institute of Makers of Explosives
Institute of Shortening and Edible Oils
Iowa Association of Business and Industry
Kansas Petroleum Council
Kentucky Association of Manufacturers
Kentucky Chamber of Commerce
Kentucky Chemical Industry Council
Lodi District Chamber of Commerce
Louisiana Chemical Association
Manufacture Alabama
Maryland Petroleum Council
Massachusetts Petroleum Council
Mesa Chamber of Commerce
Michigan Chemistry Council
Minnesota Petroleum Council
Missouri Petroleum Council
National Asphalt Pavement Association
National Association of Chemical Distributors
National Association of Manufacturers
National Cotton Council
National Council of Farmer Cooperatives
National Mining Association

National Oilseed Processors Association
National Tooling and Machining Association
Nebraska Chamber of Commerce and Industry
New Jersey Petroleum Council
New Mexico Association of Commerce & Industry
New York State Chemistry Council
North American Die Casting Association
North Carolina Petroleum Council
North Orange County Chamber
Ohio Chamber of Commerce
Ohio Chemistry Technology Council
Oklahoma State Chamber
Oregon Women In Timber
Owens Illinois, Inc.
Oxnard Chamber of Commerce
Pennsylvania Chamber of Business and Industry
Petroleum Association of Wyoming
Petroleum Marketers Association of America
Portland Cement Association
Precision Machined Products Association
Precision Metalforming Association
Rancho Cordova Chamber of Commerce
Roof Coatings Manufacturers Association (RCMA)

Salt Lake Chamber
San Gabriel Valley Economic Partnership
South Carolina Chamber of Commerce
South Carolina Manufacturers Alliance
Tempe Chamber of Commerce
Tennessee Chamber of Commerce & Industry
Tennessee Petroleum Council
Texas Association of Manufacturers
Texas Oil and Gas Association
The Fertilizer Institute
Treated Wood Council
Truck and Engine Manufacturers Association
Tucson Metro Chamber
Tulsa Regional Chamber
U.S. Chamber of Commerce
Utah Petroleum Association
Virginia Chamber of Commerce
Virginia Petroleum Council
West Baton Rouge Chamber of Commerce
West Virginia Chamber of Commerce
West Virginia Manufacturers Association
West Virginia Petroleum Council
Wisconsin Manufacturers & Commerce
Wisconsin Petroleum Council
Wyoming Petroleum Marketers Association
Yuma County Chamber of Commerce

CC: U.S. House of Representatives
U.S. Senate