July 18, 2017

The Honorable Mitch McConnell  The Honorable Paul Ryan
Majority Leader  Speaker
United States Senate  United States House of Representatives
Washington, D.C. 20510  Washington, D.C. 20515

The Honorable Chuck Schumer  The Honorable Nancy Pelosi
Minority Leader  Minority Leader
United States Senate  United States House of Representatives
Washington, D.C. 20510  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.
Flexible Packaging Association  
Florida Petroleum Council  
Fountain Hills Chamber of Commerce  
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 Marketers Association of America  
Portland Cement Association  
Precision Machined Products Association  
Precision Metalforming Association  
Queen Creek Chamber of Commerce
Rancho Cordova Chamber of Commerce
Roof Coatings Manufacturers Association (RCMA)
Salt Lake Chamber
San Gabriel Valley Economic Partnership
Scottsdale Area Chamber of Commerce
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