

August 17, 2012

EPA Docket Center (EPA/DC)
Environmental Protection Agency
Mailcode 2822T
1200 Pennsylvania Ave., NW
Washington, DC 20460-0001
Attn: Docket No. EPA-HQ-OAR-2011-0817

Re: National Emissions Standards for Hazardous Air Pollutants for the Portland Cement Manufacturing Industry and Standards of Performance for Portland Cement Plants

On behalf of the 5,000 members of the American Road and Transportation Builders Association (ARTBA), I respectfully offer comments on the Environmental Protection Agency's (EPA's) proposed rules on reconsideration for the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for the Portland Cement Manufacturing Industry and Standards of Performance for Portland Cement Plants published in the July 18 *Federal Register*.

ARTBA's membership includes public agencies and private firms and organizations that own, plan, design, supply and construct transportation projects throughout the country. Our industry generates more than \$380 billion annually in U.S. economic activity and sustains more than 3.3 million American jobs.

Because of the nature of their businesses, ARTBA members undertake a variety of activities that utilize portland cement. ARTBA's public sector members adopt, approve, or fund transportation plans, programs, or projects, many of which are constructed with portland cement. ARTBA's private sector members plan, design, construct and provide supplies, including portland cement, for these improvements. This document represents the collective views of our 5,000 member companies and organizations.

ARTBA strongly supported EPA's proposed settlement agreement addressing an ongoing effort to make changes to the NESHAP in comments submitted on June 7. ARTBA believes EPA's proposed rule on reconsideration adequately addresses the changes outlined in the settlement agreement and maintains our support for this effort.

Specifically, ARTBA is supportive of the proposed rule's extension of the compliance deadline from September 2013 to September 2015. By extending the compliance deadline, EPA will ensure there is enough time for the development of a high quality rule that reduces emissions of hazardous air pollutants while allowing a product critical to the nation's infrastructure to continue to be produced at a level commensurate with the nation's infrastructure needs.



ARTBA also continues to believe EPA should carefully consider the role of portland cement in transportation construction generally as it proceeds with the proposed NESHAP. Since 1980, the number of lane miles in the United States has only increased by six percent while the total vehicle miles travelled has increased 93 percent in the same period. The nation's road system is not keeping up with an ever growing congestion problem. An unnecessarily restrictive NESHAP for portland cement would exacerbate this problem by imposing new obstacles for a key material used in the construction of needed transportation improvements that can cut both harmful emissions and billions of dollars in wasted motor fuel caused by traffic congestion.

Sincerely,

A handwritten signature in black ink that reads "T. Peter Ruane". The signature is written in a cursive style with a large, stylized initial "T".

T. Peter Ruane
President & C.E.O