

June 7, 2012

EPA Docket Center
Environmental Protection Agency
Mailcode 2822T
1200 Pennsylvania Ave., NW
Washington, DC 20460-0001
Attn: Docket No. EPA-HQ-OAR-2011-0344

Re: Proposed Settlement Agreement, Docket No. EPA-HQ-OAR-2011-0344

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 settlement agreement with the Portland Cement Association (PCA) in the May 8 *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 \$200 billion annually in U.S. economic activity and sustains more than 2.2 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 supports the proposed settlement agreement, which addresses an ongoing effort by EPA to make changes to the portland cement national emission standard for hazardous air pollutants (NESHAP) and recommends that the EPA agree to its terms.

Specifically, ARTBA is supportive of the potential proposed extension of the NESHAP rule 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.



Further, as EPA continues the process of examining the portland cement NESHAP, there should be careful consideration paid to the role of portland cement in transportation construction generally. Since 1980, the number of lane miles in the United States has only increased by six percent. 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.

Thank you for allowing ARTBA to comment on this proposed settlement agreement.

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