



Pennsylvania Aggregates and Concrete Association

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January 14, 2021

Sent via email to RegComments@pa.gov

Virendra Trivedi, Chief, Division of Permits
PA Department of Environmental Protection
Bureau of Air Quality
400 Market Street
Harrisburg, PA

RE: Proposed CO2 Budget Trading Program

Dear Mr. Trivedi:

In the November 7, 2020 Pennsylvania Bulletin, was a request for public comments on the proposed rulemaking for the CO2 Budget Trading Program. 50 Pa. B. 6212, 6231.

The Pennsylvania Aggregates and Concrete Association (PACA) opposes the proposed CO2 Budget Trading Program for the following reasons:

- Air emissions have decreased significantly since the 1990s in Pennsylvania and will continue to do so.
- The proposed rulemaking will have unintended consequences and increase costs for our industry due to increased energy costs.
- Pennsylvania is an energy producing state and would be penalized for that production with this proposed program.
- Pennsylvania will get to the end point desired without this proposed program.
- And finally, after much discussion, several of DEP's Advisory Committees voted no on moving forward with this proposed rulemaking.

We appreciate the opportunity to comment on this proposed rulemaking.

Sincerely,

J. A. Gaskey
Dir., ES&H

