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August 8, 2018

Andrew R. Wheeler, Acting Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Re: EPA Proposed Rule: Strengthening Transparency in Regulatory Science. 83 Fed. Reg. 18,768 (Apr. 30, 2018). Docket Number EPA-HQ-OA-2018-0259.

Dear Administrator Wheeler,

I am writing to you on behalf of Gernatt Asphalt Products, Inc. and it's 200+ employees from southwestern New York State, as members of the National Stone, Sand & Gravel Association (NSSGA). We support the above-referenced rule which will strengthen transparency in regulatory science. As active sand and gravel miners, we are intimately familiar with the myriad of existing Federal environmental regulations that govern our operations. We are also keenly aware of the importance of a healthy environment, which supports our business by providing products and jobs now, and for the future of our children and Country.

Our goal has always been to operate within the regulatory framework of whatever entity we are working within, not merely to avoid the legal ramifications of non-compliance, but also in the spirit that sound environmental regulation keeps the playing field level for everyone in the industry while promoting sustainability. The products we supply are imperative to the infrastructure that supports the well-being of every citizen and business in this Country. Many people do not make the connection between a sound and stable aggregate mining industry and our vibrant, safe, and progressive way of life. These folks assume our industry is inherently a detriment to the environment, resulting in long-term negative impacts. As a result, popular sentiment is often that more regulation of industry like ours is not only needed, but somehow heroic. This is simply not true.

That is why it is extremely important for regulations to be thoroughly vetted for their need, effectiveness, and beneficial result before they're imposed on industry like ours. The proposed transparency rule will help ensure that only scientifically sound regulatory initiatives are considered for implementation, saving producers from poorly thought out, knee-jerk type of regulations that result from over-reaction.

As an active member of the NSSGA, we fully support their comments on this issue. Please consider those comments, and our position as stated above, when considering this rule. Thank you.

Sincerely,

Richard Pecnik

Richard Pecnik
Regulatory Affairs
Gernatt Asphalt Products, Inc.

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