



March 3, 2025

The Honorable Mike Johnson  
Speaker  
U.S. House of Representatives  
Washington, D.C. 20515

The Honorable Hakeem Jeffries  
Democratic Leader  
U.S. House of Representatives  
Washington, D.C. 20515

**RE: USTMA Support for H.J.Res. 61**

Dear Speaker Johnson and Leader Jeffries:

On behalf of the U.S. Tire Manufacturers Association (USTMA), I write to you in **support of H.J.Res. 61**, providing for congressional disapproval under chapter 8 of title 5, United States Code, of the rule submitted by the Environmental Protection Agency (EPA) relating to “National Emission Standards for Hazardous Air Pollutants (NESHAP): Rubber Tire Manufacturing.” This resolution would undo a poorly drafted and overly burdensome regulatory update and return industry to the previously established NESHAP rules that have kept our air clean and communities safe.

**Tire manufacturing facilities understand the importance of, and have complied with, the existing EPA NESHAP standard to reduce emissions of hazardous air pollutants (HAPs) from rubber mixers.**

However, despite EPA’s own assessment in 2020 demonstrating the industry’s HAPs are under the acceptable threshold, the agency published the NESHAP final rule for the Rubber Tire Manufacturing Sector on November 29, 2024. The final rule requires rubber manufacturing facilities to install devices that would **increase CO<sub>2</sub> emissions**, imposing a **significant financial burden** while providing **negligible reductions in the already minimal HAPs**.

These emission limits apply to 94 rubber mixers at 11 major source tire manufacturing facilities in 9 states: Arkansas, Illinois, Kansas, Mississippi, North Carolina, Ohio, Oklahoma, South Carolina and Virginia. To meet these emission limits, tire manufacturing facilities will have to install and operate numerous control devices known as regenerative thermal oxidizers, which require **significant input of natural gas to combust pollutants**.

EPA established a total hydrocarbons (THC) emission limit in this rulemaking to reduce emissions of HAPs, even though **the two sets of pollutants are not correlated**. Further, despite EPA’s stated intent to reduce emissions of HAPs through this rulemaking, **EPA does not provide any quantitative prediction of the reduction in HAPs** that they aim to achieve through compliance with the final rule.

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The U.S. Tire Manufacturers Association is the national trade association for tire manufacturers that produce tires in the U.S. Our 11 member companies operate 55 tire-related manufacturing facilities in 16 states. U.S. tire manufacturing has an annual economic footprint of \$170.6 billion and is responsible for more than 291,000 U.S. jobs in manufacturing, distribution and retailing. The industry supports more than 510,000 additional U.S. jobs in supplier and induced activities, totaling more than 801,000 jobs nationwide. USTMA advances a sustainable tire manufacturing industry through thought leadership and a commitment to science-based public policy advocacy. Our member company tires make mobility possible. USTMA members are committed to continuous improvement of the performance of our products, worker and consumer safety and environmental stewardship.

U.S. tire manufacturers are a critical part of the American economy, with a commitment to sustainable practices in every aspect of their businesses. As global leaders in manufacturing, our companies embrace a shared responsibility of helping to achieve a more sustainable society. As such, we urge you to support the passage of H.J.Res. 61. For more information, please contact Nicholas Scoufaras, USTMA's Deputy Director of Government Affairs, at (202) 682-4853 or [nscoufaras@ustires.org](mailto:nscoufaras@ustires.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Anne Luke". The signature is fluid and cursive, with a large initial "A" and "L".

Anne Forristall Luke

President and CEO

U.S. Tire Manufacturers Association

Cc: Members, U.S. House of Representatives