

Aric Newhouse

Senior Vice President
Policy and Government Relations

October 14, 2011

U.S. House of Representatives
Washington, DC 20515

Dear Representative:

The National Association of Manufacturers (NAM), the largest manufacturing association in the United States representing manufacturers in every industrial sector and in all 50 states, urges you to support H.R. 2273, the Coal Residuals Reuse and Management Act.

Under proposed rules issued in 2010, the Environmental Protection Agency (EPA) is considering whether to regulate the disposal of coal ash and other coal combustion residuals (CCRs) as non-hazardous or hazardous waste under the Resource Conservation and Recovery Act (RCRA). The EPA has postponed finalizing its rules due to the more than 400,000 comments it has received. This has created great uncertainty for those who generate, recycle or use coal ash.

Classifying CCRs as hazardous waste would eventually impact every sector that uses coal as a fuel source, including: manufacturing; electric utilities; mining; pulp and paper; and more. It would almost certainly trigger an increase in disposal expenses for coal-fired power plants and companies that recycle coal ash to manufacture wallboard, asphalt, concrete and other building materials. Ironically, the EPA has on four prior occasions concluded that CCRs do not warrant regulation as hazardous waste.

The cost to American workers would be devastating as well. The EPA's proposed hazardous waste rules for coal ash would result in net job losses of between 184,000 and 316,000, while its proposed non-hazardous waste rules would trigger job losses of between 39,000 and 65,000 jobs, according to Veritas Economic Consulting.

H.R. 2273 represents a common-sense solution that would ensure the safe regulation of coal ash/CCRs in a cost-effective manner, while protecting public health, the environment and thousands of high-paying American jobs. We urge your support.

The NAM's Key Vote Advisory Committee has indicated that votes on H.R. 2273, including procedural motions, may be considered for designation as Key Manufacturing Votes in the 112th Congress. Thank you for your consideration.

Sincerely,



Aric Newhouse

Key Manufacturing Vote