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The National Association of Manufacturers (NAM) commissioned ndp|consulting to assess the EPA's assumptions and conclusions in its cost-benefit analyses for six of its proposed regulations: Utility MACT, Boiler MACT, Coal Combustion Residuals, Cooling Water Intake Structures, the Cross-State Air Pollution Rule and National Ambient Air Quality Standards for Ozone. The cost impact of these regulations would be far more severe than EPA estimates.

Both the EPA and industry estimate that the cumulative impact of the proposed regulations could cost roughly \$100 billion annually. In a worst-case scenario, the regulations could mean the loss of \$630 billion, 4.2 percent of GDP and from 2 million to as much as 9 million jobs.

The combined annual impact of the EPA's Utility MACT, Boiler MACT and Coal Combustion Residuals rules by state is astonishing:

## Alabama

Annual compliance costs: **\$631.6 million**

Annual manufacturing sector compliance costs: **\$298.9 million**

Total upfront capital expenditures to comply: **\$4.2 billion**

Total manufacturing sector upfront capital expenditures: **\$1.9 billion**

Other troubling findings in *A Critical Review of the Benefits and Costs of EPA Regulations on the U.S. Economy* include the following:

- The annual compliance costs for all six regulations range from \$36 billion to \$111.2 billion (by EPA estimates) and from \$63.2 billion to \$138.2 billion (by industry estimates).
- The total capital expenditures for all six regulations range from \$174.6 billion to \$539.3 billion (by EPA estimates) and from \$404.5 billion to \$884.5 billion (by industry estimates).

A number of these regulations could be finalized during the next four years, and even more are on the horizon. The cumulative impact of these regulations is holding back our nation's manufacturing renaissance and giving our competitors the advantage they desire.

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## Alaska

Annual compliance costs: **\$30 million**

Annual manufacturing sector compliance costs: **\$28 million**

Total upfront capital expenditures to comply: **\$155.8 million**

Total manufacturing sector upfront capital expenditures: **\$147.3 million**

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## Arizona

Annual compliance costs: **\$421 million**  
Annual manufacturing sector compliance costs: **\$78.6 million**  
Total upfront capital expenditures to comply: **\$2.7 billion**  
Total manufacturing sector upfront capital expenditures: **\$500 million**

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## Arkansas

Annual compliance costs: **\$220 million**  
Annual manufacturing sector compliance costs: **\$114.1 million**  
Total upfront capital expenditures to comply: **\$1.5 billion**  
Total manufacturing sector upfront capital expenditures: **\$735.2 million**

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## California

Annual compliance costs: **\$181.9 million**

Annual manufacturing sector compliance costs: **\$44.9 million**

Total upfront capital expenditures to comply: **\$1.38 billion**

Total manufacturing sector upfront capital expenditures: **\$317 million**

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## Colorado

Annual compliance costs: **\$267.1 million**

Annual manufacturing sector compliance costs: **\$92.2 million**

Total upfront capital expenditures to comply: **\$1.76 billion**

Total manufacturing sector upfront capital expenditures: **\$595.9 million**

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## Connecticut

Annual compliance costs: **\$109.1 million**

Annual manufacturing sector compliance costs: **\$33.6 million**

Total upfront capital expenditures to comply: **\$780.7 million**

Total manufacturing sector upfront capital expenditures: **\$208.2 million**

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## Delaware

Annual compliance costs: **\$55.4 million**  
Annual manufacturing sector compliance costs: **\$16.6 million**  
Total upfront capital expenditures to comply: **\$383.8 million**  
Total manufacturing sector upfront capital expenditures: **\$110.9 million**

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## District of Columbia

Annual compliance costs: **\$14.8 million**

Annual manufacturing sector compliance costs: **\$300,000**

Total upfront capital expenditures to comply: **\$117.7 million**

Total manufacturing sector upfront capital expenditures: **\$2.4 million**

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## Florida

Annual compliance costs: **\$1.2 billion**

Annual manufacturing sector compliance costs: **\$133 million**

Total upfront capital expenditures to comply: **\$8.2 billion**

Total manufacturing sector upfront capital expenditures: **\$852 million**

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## Georgia

Annual compliance costs: **\$794 million**  
Annual manufacturing sector compliance costs: **\$260.4 million**  
Total upfront capital expenditures to comply: **\$4.95 billion**  
Total manufacturing sector upfront capital expenditures: **\$1.57 billion**

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## Hawaii

Annual compliance costs: **\$33.6 million**

Annual manufacturing sector compliance costs: **\$31.6 million**

Total upfront capital expenditures to comply: **\$174.8 million**

Total manufacturing sector upfront capital expenditures: **\$166 million**

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## Idaho

Annual compliance costs: **\$15 million**

Annual manufacturing sector compliance costs: **\$15 million**

Total upfront capital expenditures to comply: **\$79.5 million**

Total manufacturing sector upfront capital expenditures: **\$79.5 million**

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## Illinois

Annual compliance costs: **\$806.1 million**

Annual manufacturing sector compliance costs: **\$341 million**

Total upfront capital expenditures to comply: **\$5.38 billion**

Total manufacturing sector upfront capital expenditures: **\$2.18 billion**

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## Indiana

Annual compliance costs: **\$1.2 billion**

Annual manufacturing sector compliance costs: **\$647.5 million**

Total upfront capital expenditures to comply: **\$7.3 billion**

Total manufacturing sector upfront capital expenditures: **\$3.9 billion**

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# Questionable Regulations Are Killing Manufacturing Jobs and Resources

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The combined annual impact of the EPA's Utility MACT, Boiler MACT and Coal Combustion Residuals rules by state is astonishing:

## Iowa

Annual compliance costs: **\$326.9 million**

Annual manufacturing sector compliance costs: **\$199.7 million**

Total upfront capital expenditures to comply: **\$2.14 billion**

Total manufacturing sector upfront capital expenditures: **\$1.24 billion**

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The combined annual impact of the EPA's Utility MACT, Boiler MACT and Coal Combustion Residuals rules by state is astonishing:

## Kansas

Annual compliance costs: **\$289.4 million**

Annual manufacturing sector compliance costs: **\$94.9 million**

Total upfront capital expenditures to comply: **\$1.98 billion**

Total manufacturing sector upfront capital expenditures: **\$634.5 million**

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The combined annual impact of the EPA's Utility MACT, Boiler MACT and Coal Combustion Residuals rules by state is astonishing:

## Kentucky

Annual compliance costs: **\$988.3 million**

Annual manufacturing sector compliance costs: **\$505.9 million**

Total upfront capital expenditures to comply: **\$6.01 billion**

Total manufacturing sector upfront capital expenditures: **\$3.06 billion**

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The combined annual impact of the EPA's Utility MACT, Boiler MACT and Coal Combustion Residuals rules by state is astonishing:

## Louisiana

Annual compliance costs: **\$455.6 million**

Annual manufacturing sector compliance costs: **\$198.8 million**

Total upfront capital expenditures to comply: **\$3.19 billion**

Total manufacturing sector upfront capital expenditures: **\$1.34 billion**

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The combined annual impact of the EPA's Utility MACT, Boiler MACT and Coal Combustion Residuals rules by state is astonishing:

## Maine

Annual compliance costs: **\$79.3 million**

Annual manufacturing sector compliance costs: **\$59.5 million**

Total upfront capital expenditures to comply: **\$485.5 million**

Total manufacturing sector upfront capital expenditures: **\$334 million**

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The combined annual impact of the EPA's Utility MACT, Boiler MACT and Coal Combustion Residuals rules by state is astonishing:

## Maryland

Annual compliance costs: **\$354.7 million**

Annual manufacturing sector compliance costs: **\$65.4 million**

Total upfront capital expenditures to comply: **\$2.35 billion**

Total manufacturing sector upfront capital expenditures: **\$388.8 million**

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The combined annual impact of the EPA's Utility MACT, Boiler MACT and Coal Combustion Residuals rules by state is astonishing:

## Massachusetts

Annual compliance costs: **\$204.2 million**

Annual manufacturing sector compliance costs: **\$86 million**

Total upfront capital expenditures to comply: **\$1.48 billion**

Total manufacturing sector upfront capital expenditures: **\$587 million**

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## Michigan

Annual compliance costs: **\$681.8 million**

Annual manufacturing sector compliance costs: **\$322.4 million**

Total upfront capital expenditures to comply: **\$4.6 billion**

Total manufacturing sector upfront capital expenditures: **\$2 billion**

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The combined annual impact of the EPA's Utility MACT, Boiler MACT and Coal Combustion Residuals rules by state is astonishing:

## Minnesota

Annual compliance costs: **\$333.7 million**

Annual manufacturing sector compliance costs: **\$187.2 million**

Total upfront capital expenditures to comply: **\$2.1 billion**

Total manufacturing sector upfront capital expenditures: **\$1.1 billion**

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The combined annual impact of the EPA's Utility MACT, Boiler MACT and Coal Combustion Residuals rules by state is astonishing:

## Mississippi

Annual compliance costs: **\$274.4 million**

Annual manufacturing sector compliance costs: **\$118.3 million**

Total upfront capital expenditures to comply: **\$1.87 billion**

Total manufacturing sector upfront capital expenditures: **\$773.9 million**

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The combined annual impact of the EPA's Utility MACT, Boiler MACT and Coal Combustion Residuals rules by state is astonishing:

## Missouri

Annual compliance costs: **\$533.9 million**

Annual manufacturing sector compliance costs: **\$172.9 million**

Total upfront capital expenditures to comply: **\$3.5 billion**

Total manufacturing sector upfront capital expenditures: **\$1.1 billion**

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The combined annual impact of the EPA's Utility MACT, Boiler MACT and Coal Combustion Residuals rules by state is astonishing:

## Montana

Annual compliance costs: **\$172.2 million**

Annual manufacturing sector compliance costs: **\$56.3 million**

Total upfront capital expenditures to comply: **\$1 billion**

Total manufacturing sector upfront capital expenditures: **\$324.8 million**

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The combined annual impact of the EPA's Utility MACT, Boiler MACT and Coal Combustion Residuals rules by state is astonishing:

## Nebraska

Annual compliance costs: **\$163.6 million**

Annual manufacturing sector compliance costs: **\$65.4 million**

Total upfront capital expenditures to comply: **\$1.15 billion**

Total manufacturing sector upfront capital expenditures: **\$448.1 million**

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The combined annual impact of the EPA's Utility MACT, Boiler MACT and Coal Combustion Residuals rules by state is astonishing:

## Nevada

Annual compliance costs: **\$92.7 million**  
Annual manufacturing sector compliance costs: **\$39.7 million**  
Total upfront capital expenditures to comply: **\$663.3 million**  
Total manufacturing sector upfront capital expenditures: **\$284.1 million**

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## New Hampshire

Annual compliance costs: **\$36.8 million**

Annual manufacturing sector compliance costs: **\$7 million**

Total upfront capital expenditures to comply: **\$259.1 million**

Total manufacturing sector upfront capital expenditures: **\$49.2 million**

Other troubling findings in *A Critical Review of the Benefits and Costs of EPA Regulations on the U.S. Economy* include the following:

- The annual compliance costs for all six regulations range from \$36 billion to \$111.2 billion (by EPA estimates) and from \$63.2 billion to \$138.2 billion (by industry estimates).
- The total capital expenditures for all six regulations range from \$174.6 billion to \$539.3 billion (by EPA estimates) and from \$404.5 billion to \$884.5 billion (by industry estimates).

A number of these regulations could be finalized during the next four years, and even more are on the horizon. The cumulative impact of these regulations is holding back our nation's manufacturing renaissance and giving our competitors the advantage they desire.

# Questionable Regulations Are Killing Manufacturing Jobs and Resources

Sweeping new regulations from the Environmental Protection Agency (EPA) could produce negative net benefits to society and cost hundreds of billions of dollars for manufacturers in the United States, according to a new study. Emerging regulations on air emissions, water use and waste disposal will bury manufacturing in the United States at a time when our overseas competitors are looking to overtake us. Imposing such a burden on manufacturers and other producers in the United States, particularly when the economy is struggling to gain momentum, would be even more detrimental.

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The combined annual impact of the EPA's Utility MACT, Boiler MACT and Coal Combustion Residuals rules by state is astonishing:

## New Jersey

Annual compliance costs: **\$154.5 million**

Annual manufacturing sector compliance costs: **\$37.8 million**

Total upfront capital expenditures to comply: **\$1.03 billion**

Total manufacturing sector upfront capital expenditures: **\$225.5 million**

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The combined annual impact of the EPA's Utility MACT, Boiler MACT and Coal Combustion Residuals rules by state is astonishing:

## New Mexico

Annual compliance costs: **\$327.8 million**

Annual manufacturing sector compliance costs: **\$107.9 million**

Total upfront capital expenditures to comply: **\$1.84 billion**

Total manufacturing sector upfront capital expenditures: **\$606.2 million**

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The combined annual impact of the EPA's Utility MACT, Boiler MACT and Coal Combustion Residuals rules by state is astonishing:

## New York

Annual compliance costs: **\$596.7 million**

Annual manufacturing sector compliance costs: **\$154.7 million**

Total upfront capital expenditures to comply: **\$4.18 billion**

Total manufacturing sector upfront capital expenditures: **\$921.6 million**

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The combined annual impact of the EPA's Utility MACT, Boiler MACT and Coal Combustion Residuals rules by state is astonishing:

## North Carolina

Annual compliance costs: **\$854.5 million**

Annual manufacturing sector compliance costs: **\$347 million**

Total upfront capital expenditures to comply: **\$5.3 billion**

Total manufacturing sector upfront capital expenditures: **\$2 billion**

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The combined annual impact of the EPA's Utility MACT, Boiler MACT and Coal Combustion Residuals rules by state is astonishing:

## North Dakota

Annual compliance costs: **\$296.4 million**

Annual manufacturing sector compliance costs: **\$113 million**

Total upfront capital expenditures to comply: **\$1.72 billion**

Total manufacturing sector upfront capital expenditures: **\$650.4 million**

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The combined annual impact of the EPA's Utility MACT, Boiler MACT and Coal Combustion Residuals rules by state is astonishing:

## Ohio

Annual compliance costs: **\$1.3 billion**

Annual manufacturing sector compliance costs: **\$593.7 million**

Total upfront capital expenditures to comply: **\$8 billion**

Total manufacturing sector upfront capital expenditures: **\$3.5 billion**

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The combined annual impact of the EPA's Utility MACT, Boiler MACT and Coal Combustion Residuals rules by state is astonishing:

## Oklahoma

Annual compliance costs: **\$394.2 million**

Annual manufacturing sector compliance costs: **\$124.6 million**

Total upfront capital expenditures to comply: **\$2.8 billion**

Total manufacturing sector upfront capital expenditures: **\$859.1 million**

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The combined annual impact of the EPA's Utility MACT, Boiler MACT and Coal Combustion Residuals rules by state is astonishing:

## Oregon

Annual compliance costs: **\$49.8 million**  
Annual manufacturing sector compliance costs: **\$34.3 million**  
Total upfront capital expenditures to comply: **\$300.9 million**  
Total manufacturing sector upfront capital expenditures: **\$191.5 million**

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The combined annual impact of the EPA's Utility MACT, Boiler MACT and Coal Combustion Residuals rules by state is astonishing:

## Pennsylvania

Annual compliance costs: **\$1.5 billion**

Annual manufacturing sector compliance costs: **\$651.6 million**

Total upfront capital expenditures to comply: **\$8.9 billion**

Total manufacturing sector upfront capital expenditures: **\$3.7 billion**

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The combined annual impact of the EPA's Utility MACT, Boiler MACT and Coal Combustion Residuals rules by state is astonishing:

## Rhode Island

Annual compliance costs: **\$3.7 million**  
Annual manufacturing sector compliance costs: **\$3.7 million**  
Total upfront capital expenditures to comply: **\$19.4 million**  
Total manufacturing sector upfront capital expenditures: **\$19.4 million**

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The combined annual impact of the EPA's Utility MACT, Boiler MACT and Coal Combustion Residuals rules by state is astonishing:

## South Carolina

Annual compliance costs: **\$488.8 million**

Annual manufacturing sector compliance costs: **\$270.5 million**

Total upfront capital expenditures to comply: **\$3.11 billion**

Total manufacturing sector upfront capital expenditures: **\$1.63 billion**

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The combined annual impact of the EPA's Utility MACT, Boiler MACT and Coal Combustion Residuals rules by state is astonishing:

## South Dakota

Annual compliance costs: **\$18.3 million**  
Annual manufacturing sector compliance costs: **\$4.2 million**  
Total upfront capital expenditures to comply: **\$125.3 million**  
Total manufacturing sector upfront capital expenditures: **\$28.9 million**

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The combined annual impact of the EPA's Utility MACT, Boiler MACT and Coal Combustion Residuals rules by state is astonishing:

## Tennessee

Annual compliance costs: **\$546.2 million**

Annual manufacturing sector compliance costs: **\$235.1 million**

Total upfront capital expenditures to comply: **\$3.49 billion**

Total manufacturing sector upfront capital expenditures: **\$1.44 billion**

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## Texas

Annual compliance costs: **\$1.9 billion**

Annual manufacturing sector compliance costs: **\$569.8 million**

Total upfront capital expenditures to comply: **\$12.7 billion**

Total manufacturing sector upfront capital expenditures: **\$3.7 billion**

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Both the EPA and industry estimate that the cumulative impact of the proposed regulations could cost roughly \$100 billion annually. In a worst-case scenario, the regulations could mean the loss of \$630 billion, 4.2 percent of GDP and from 2 million to as much as 9 million jobs.

The combined annual impact of the EPA's Utility MACT, Boiler MACT and Coal Combustion Residuals rules by state is astonishing:

## Utah

Annual compliance costs: **\$270.8 million**

Annual manufacturing sector compliance costs: **\$99.4 million**

Total upfront capital expenditures to comply: **\$1.66 billion**

Total manufacturing sector upfront capital expenditures: **\$608.7 million**

Other troubling findings in *A Critical Review of the Benefits and Costs of EPA Regulations on the U.S. Economy* include the following:

- The annual compliance costs for all six regulations range from \$36 billion to \$111.2 billion (by EPA estimates) and from \$63.2 billion to \$138.2 billion (by industry estimates).
- The total capital expenditures for all six regulations range from \$174.6 billion to \$539.3 billion (by EPA estimates) and from \$404.5 billion to \$884.5 billion (by industry estimates).

A number of these regulations could be finalized during the next four years, and even more are on the horizon. The cumulative impact of these regulations is holding back our nation's manufacturing renaissance and giving our competitors the advantage they desire.

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## Vermont

No data available

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## Virginia

Annual compliance costs: **\$487.8 million**

Annual manufacturing sector compliance costs: **\$179.2 million**

Total upfront capital expenditures to comply: **\$3.1 billion**

Total manufacturing sector upfront capital expenditures: **\$1 billion**

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## Washington

Annual compliance costs: **\$143.1 million**

Annual manufacturing sector compliance costs: **\$59.7 million**

Total upfront capital expenditures to comply: **\$808.1 million**

Total manufacturing sector upfront capital expenditures: **\$331.4 million**

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## West Virginia

Annual compliance costs: **\$1 billion**

Annual manufacturing sector compliance costs: **\$473.2 million**

Total upfront capital expenditures to comply: **\$5.9 billion**

Total manufacturing sector upfront capital expenditures: **\$2.8 billion**

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## Wisconsin

Annual compliance costs: **\$427.1 million**

Annual manufacturing sector compliance costs: **\$224.8 million**

Total upfront capital expenditures to comply: **\$2.8 billion**

Total manufacturing sector upfront capital expenditures: **\$1.4 billion**

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## Wyoming

Annual compliance costs: **\$318.6 million**

Annual manufacturing sector compliance costs: **\$205.9 million**

Total upfront capital expenditures to comply: **\$2.03 billion**

Total manufacturing sector upfront capital expenditures: **\$1.3 billion**

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