

Aric Newhouse

Senior Vice President
Policy and Government Relations

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U.S. House of Representatives
Washington, DC 20515

Dear Representatives:

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. 2250, the EPA Regulatory Relief Act.

As finalized, the Environmental Protection Agency's (EPA) Boiler MACT rules are not only unaffordable but unachievable. Manufacturers across several industry sectors will be impacted, including the chemical, food processing, petroleum refining, and forest and paper sectors. Facilities will be forced to shut down. More than 230,000 high-paying jobs will be at risk, according to a 2010 Council of Industrial Boiler Owners study.

As the EPA has acknowledged, these rules were finalized with serious flaws because the agency was forced to meet a strict court-ordered deadline. The final Boiler MACT rule alone would cost over \$14 billion in capital for the manufacturing sector, plus billions more in annual operating costs. Moreover, the incinerator standards – which erroneously presume that materials commonly used as fuels are waste and would subject companies to stricter standards – could cost several billion dollars more in manufacturing capital and threaten even more job losses.

H.R. 2250 advocates a balanced approach that would give the EPA the time it needs to re-propose the rules and get them right, while giving companies the certainty they need to plan, invest and comply with the rules' capital-intensive requirements. It also clarifies that renewable and carbon-neutral materials long used as fuels will not be classified as waste under the Non-Hazardous Secondary Materials rule.

Most importantly, H.R. 2250 will preserve jobs and manufacturing competitiveness while protecting the environment. We urge your support.

The NAM's Key Vote Advisory Committee has indicated that votes on H.R. 2250, 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