

Chairman of the Board
JEFFREY L. HOLLISTER
President, Vanguard Paints & Finishes, Inc.



President
ERIC L. BURKLAND

9/30/2011

The Honorable Sherrod Brown
The United State Senate
713 Hart Senate Office Building
Washington, DC 20510
FAX: 202-228-6321

Dear Senator Brown:

Representing Ohio's manufacturers, the Ohio Manufacturers' Association (OMA) believes it's important that the U.S. Environmental Protection Agency take a common-sense approach to the agency's regulatory policies.

The OMA's mission is to protect and grown manufacturing in Ohio. The OMA does this by working with elected officials, regulatory agencies, the judiciary, and the media. The OMA supports environmental regulations that are protective of human health and supported by sound science. The OMA also supports a review of the technical feasibility of regulations and their implementation timelines, such as the Utility MACT and the Cross State Air Pollution Rule.

These two regulations could be among the most expensive in history. By EPA's own calculation, the Utility MACT Rule alone could cost utilities almost \$11 billion in 2015. Initial findings from a study conducted by the National Economic Research Associates (NERA) conclude that just these two rules together would cost the electricity sector nearly \$18 billion a year to comply with at a total cost of \$184 billion (calculated on present value) over the next 20 years. Environmental costs such as these are generally pass-through costs for utilities. This means that electricity customers will ultimately bear this burden.

For Ohio, these two rules, according to NERA, could cost over 54,000 job years (a "job year" is one job for a year) and raise electricity rates by as much as 12 percent. That would have a devastating impact on our members as they already are working to overcome severe economic challenges. A double-digit increase in electricity prices would severely dampen their future outlook.

The OMA respectfully requests you that you consider the economic impact of these regulations and their implementation timelines on Ohio and engage U.S. EPA in a discussion to lessen the burden on Ohioans.

Thank you for your continued focus on Ohio's manufacturing industry. Please do not hesitate to contact me with questions you or your staff may have.

Sincerely,


Kevin Schmidt
Director, Public Policy Services