



**ASSOCIATED INDUSTRIES OF FLORIDA**  
*The Voice of Florida Business Since 1920*



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July 28, 2010

Dear Florida Congressional Delegation Members:

On behalf of Associated Industries of Florida (AIF) and the 10,000 employer members that we represent, I am writing to you today to express deep concern over EPA's proposed Boiler Maximum Achievable Control Technology (Boiler MACT) ruling that could have severe and unwarranted implications to Florida's manufacturing economy. As the state affiliate for the National Association of Manufacturer's (NAM) since 1951, our manufacturing industry will be significantly and adversely impacted by these onerous rules.

AIF is profoundly troubled with the rules that the EPA has proposed for gas, liquid, or solid-fuel fired boilers and process heaters located at a wide range of manufacturers, small municipalities, and federal facilities. Industry experts have indicated that the total costs to comply with these regulatory burdens could be as much as **\$20 to \$50 billion**. Furthermore, the costs attributed to the forest products industry alone could amount from **\$6 to \$7 billion dollars** over the next two to four years. These costs are very much alarming and significant when considering that the forest products industry made only \$1 billion in each of the last two years.

With the authority to provide reasonable approaches in its proposed Boiler MACT rule that are allowed under the Clean Air Act, the EPA can and should improve air quality and target investments strategically, preventing severe job losses and billions of dollars in unnecessary regulatory costs. Unfortunately, EPA has not decided to be reasonable nor do they seem to care about the increased costs during this deep recession. These compounded effects could result in hundreds of thousands of job losses in a sector that lost 350,000 jobs nationally since the beginning of the downturn in 2006. If you then add the lack of access to capital for many businesses, this expensive rule could further hurt Florida.

While AIF will continue to support efforts to address serious health threats from air emissions, we ask that proposed regulations concurrently address our environment, as well as our frail economy. In determining the proper Boiler MACT ruling, AIF proposes that the EPA use a reasonable method to set the MACT limits based on what real best-performing units actually *can achieve*. In other words, EPA must factor into the MACT the variability in operations, fuels, designs and testing performance across the many types of boilers. The EPA's one-size-fits-all approach will unduly penalize biomass boilers that utilize cleaner fuel, while imprecisely targeting environmental investments that face a real adverse risk from pollutants.



I must tell you that the Boiler MACT rule, along with the recent litigation-based, unscientific Numeric Nutrient Criteria rule documents represent an overzealous attitude by EPA that will significantly increase costs to consumers at the exact wrong time during a deep recession. As Florida's unemployment rate still exceeds 11 percent, our citizens cannot afford to pay the increased costs that this rule will require. I respectfully ask that you reach out to EPA Administrator Lisa P. Jackson and distinguish these onerous proposals for what they truly are: a roadblock to economic recovery for Florida's citizens.

Sincerely,

Barney T. Bishop III  
President & Chief Executive Officer