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August 4, 2011

VIA ELECTRONIC MAIL

Administrator Lisa P. Jackson
U.S. Environmental Protection Agency
Mail Code 2822T
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

ATTN: Docket ID No. EPA-HQ-OAR-2009-0234

Dear Administrator Jackson:

Please accept these comments regarding EPA's proposed Utility MACT regulation on behalf of the more than 1,500 member companies and organizations represented by The Ohio Manufacturers' Association (OMA). Our organization's mission is to protect and grow manufacturing in Ohio. The OMA appreciates the opportunity to comment on this important rule.

In the midst of one of our nation's deepest economic challenges, the EPA is proposing the Utility MACT after just finalizing the Cross State Air Pollution Rule. Unless they are significantly changed, these two regulations would be among the most expensive such regulations in history. By EPA's own calculation, the Utility MACT Rule alone would cost utilities almost \$11 billion in 2015. According to the initial findings in a study conducted by National Economic Research Associates (NERA) and released in June, just these two rules together would cost the electricity sector nearly \$18 billion a year to comply with a total cost of \$184 billion (calculated on present value) over the next 20 years.

According to NERA, more than 1,400,000 net job years (a "job year" is one job for one year) will be lost nationwide as a result of these rules and electricity rates would rise by about 11 percent nationally. Here in Ohio, these two EPA rules would cost 54,000 job years and raise electricity rates by as much as 12 percent per the NERA study.

The implementation timeline of the proposed Utility MACT appears to be too short to allow for efficient installation of the emissions control technologies that will be needed. Accordingly, the OMA requests that EPA employ the maximum amount of flexibility allowed under law to provide a more reasonable time frame for installing this technology in order to preserve Ohio jobs and hold down energy cost increases.

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Our members are working to overcome severe economic challenges and cannot afford a double-digit increase in electricity prices running out for many years in the future. Ohio cannot afford to lose another 54,000 jobs, and Ohio businesses and families would be rocked by the kind of electricity price increases projected in the NERA study. Nor can our nation take such a significant loss of almost one and a half million job years. We urge the EPA to substantially rewrite the Utility MACT Rule to dramatically reduce the negative impact on our state's economy and the quality of life of millions of Ohioans.

Respectfully yours,



Kevin Schmidt
Director, Project Services