



# Unions for Jobs And the Environment

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## Member Unions

Brotherhood of Locomotive  
Engineers

International Brotherhood  
of Boilermakers,  
Iron Ship Builders,  
Blacksmiths, Forgers  
and Helpers

International Brotherhood  
of Electrical Workers

International Brotherhood  
of Teamsters

Marine Engineers Beneficial  
Association

Transportation • Communications  
International Union

United Food and Commercial  
Workers International Union

United Mine Workers  
of America

United Transportation Union

Utility Workers Union  
of America

## President

Bill Cunningham

February 9, 2005

Honorable James M. Jeffords  
Ranking Member  
Committee on Environment and Public Works  
456 Senate Dirksen Office Building  
Washington, DC 20510

Re: Support for S. 131, Inhofe-Voinovich Bill

Dear Senators Inhofe and Jeffords:

We are writing to express our support for S. 131, the Inhofe-Voinovich multi-emission control legislation introduced in the 109<sup>th</sup> Congress.

Our member unions are responsible for the mining, transportation and combustion of American coal, the construction, maintenance and operation of the nation's fleet of electric generation plants and electric transmission infrastructure, the installation and operation of pollution control equipment, and many other services essential to the provision of domestically-produced energy to the American economy. And members' jobs and incomes are sensitive to the cost and reliability of energy in all sectors of the economy including manufacturing, which is most sensitive to costs and competitive pressures.

S. 131 is both timely and necessary legislation. Its proposed reductions of electric utility emissions of sulfur and nitrogen oxides will require the installation and operation of hundreds of advanced pollution control devices across the nation. These controls will lead to major improvements in air quality and public health by reducing urban smog, fine particulates, acid rain and regional haze. Technologies capable of achieving significant reductions of power plant sulfur and nitrogen oxides are commercially available now and can reduce emissions at reasonable costs.

S. 131 also will prevent needless litigation and delay associated with U.S. EPA rulemaking proceedings. The bill's approach to mercury emission control will avoid the need for a controversial EPA mercury rule, while ensuring the use of cost-effective emissions trading as the means to achieve a significant reduction of emissions. We specifically support the use of a "cobenefits" approach for the first phase of a mercury control program, to enable more accurate measurements of the mercury control capabilities of existing technologies applied to different coal types, and to allow time for advanced mercury-specific control technologies to mature in time to meet a final 2018 mercury cap.

We support the bill's provisions for addressing New Source Review issues. The NSR program has become complex and difficult to comply with due to changing administrative interpretations. Reasonable and predictable rules are needed to provide for the routine maintenance of power plants, ensuring worker safety.

We are mindful of the history of previous amendments to the Clean Air Act, and the risk that new emission control requirements can lead to large-scale shifts in regional coal production. Tens of thousands of coal mining and related jobs were lost due to the acid rain provisions of the 1990 Clean Air Act Amendments, crippling the economies of dozens of eastern coalfield communities. The Committee must be sensitive to the need to avoid dislocations of coal and other energy markets, and should ensure that the design of the final bill neither encourages nor discourages the use of any particular type of coal.

We also recognize the needs of states and localities to comply with U.S. EPA's new 8-hour ozone and fine particulate standards. The deadlines for compliance with these standards are approaching, and states are beginning to prepare State Implementation Plans. Computer modeling by U.S. EPA demonstrates that the reductions proposed by S. 131 would allow many states and localities to meet the new ozone and PM2.5 standards in a timely manner. Some areas, however, may not be able to demonstrate attainment with the new standards because emission reductions expected under various EPA rules for mobile and other source sectors occur many years after applicable compliance deadlines.

For this reason, some states advocate adjustment of the bill's final compliance deadlines for sulfur and nitrogen oxides. Reasonable adjustments of these final deadlines would not, in our judgment, raise issues about the availability of skilled labor to install and operate emission controls.

Please be assured that our member unions stand ready to assist in the major challenges associated with meeting the emission reduction mandates of S. 131. We hope that our comments will be helpful to you and your colleagues as you proceed to markup the final version of this important legislation.

Sincerely,

Newton B. Jones, International President  
International Brotherhood of Boilermakers,  
Iron Ship Builders, Blacksmiths, Forgers  
And Helpers

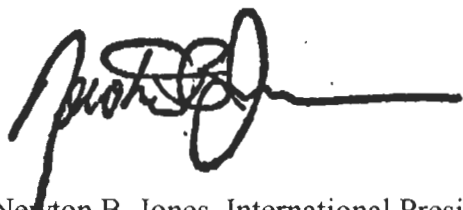
Cecil Roberts, President  
United Mine Workers of America

Robert A. Scardelletti, International President  
Transportation • Communications  
International Union

Edwin D. Hill, International President  
International Brotherhood of Electrical Workers

James P. Hoffa, President  
International Brotherhood of Teamsters

Donald E. Wightman, National President  
Utility Workers Union of America



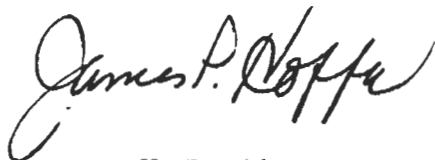
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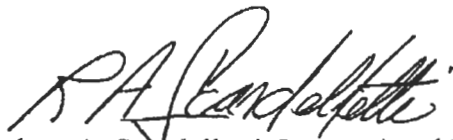
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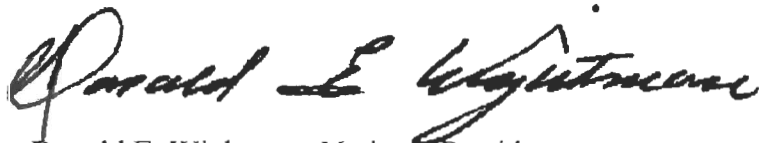
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cc: John Sweeney, President, AFL-CIO  
Richard Trumka, Secretary-Treasurer, AFL-CIO