



RECEIVED
2011 AUG 24 AM 10:55
OFFICE OF THE
EXECUTIVE SECRETARIAT

August 17, 2011

Administrator Lisa P. Jackson
U.S. Environmental Protection Agency
Room 3000, Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460
(jackson.lisa@epa.gov)

Assistant Administrator Gina McCarthy
U.S. Environmental Protection Agency
Office of Air and Radiation
Ariel Rios Building, Mail Code: 6101A
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460
(mccarthy.gina@epa.gov)

Dear Administrator Jackson and Assistant Administrator McCarthy:

The Texas Association of Manufacturers (TAM) respectfully requests that the U.S. Environmental Protection Agency ("EPA") grant partial reconsideration and immediately stay the compliance deadline and effective date of EPA's Final Rule signed July 6, 2011, titled "Federal Implementation Plans to Reduce Interstate Transport of Fine Particulate Matter and Ozone in 27 States" as it applies to Texas.

As manufacturers, energy is not only an overhead cost but also a feedstock that goes into the finished product. One of the reasons for Texas' ability to grow jobs and attract businesses has been the reliability and affordability of electricity. If this rule is finalized both the reliability and affordability of the Texas energy grid will be put in jeopardy.

The standard time frame for permitting, constructing and installing new emission controls is several years, yet the rule unrealistically allows less than six months for these controls to be installed. Significant emissions reductions and adherence to the rule would then be required in an extremely short time period - as early as January 2012. Thus, curtailing plant and/or mine operations will be the only option.

Texas Products. Texas Jobs.

• P.O.Box 11510, Austin, Texas 78711-1510 • 512-330-4124 • FAX 512-330-4126 • www.manufacturetexas.org •



These requirements would seriously jeopardize the ability of the state's electric grid to supply power to Texas businesses and consumers and threaten the loss of thousands of high-paying jobs. This summer Texas has endured a considerable heat wave, which demonstrated that Texas needs all of its power generation resources. By removing power generation from the market to comply with this rule, the EPA's recent action threatens electric reliability in Texas.

Should this final rule be published with Texas included, it could have a far-reaching impact throughout the state and nation. Effects could include:

- The loss of thousands of well-paying jobs, further exacerbating the already high unemployment rate;
- An increase in wholesale and consumer electricity prices, making the US less competitive in the global market;
- A negative impact on the state's electric reliability, jeopardizing not only industrial operations but the safety of some of our most vulnerable citizens; and
- The loss of indirect and third-party jobs and services which support the state's electric industry.

TAM firmly believes that this rule has a substantially negative effect on Texas and the future prosperity of the state and nation. It is our sincere request that the EPA grant partial reconsideration and immediately stay the compliance deadline and effective date of the rule entitled "Federal Implementation Plans to Reduce Interstate Transport of Fine Particulate Matter and Ozone in 27 States" as related to Texas.

Respectfully,

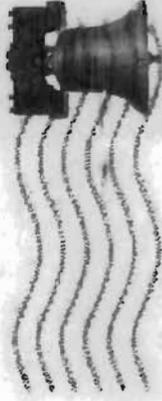
A handwritten signature in black ink, appearing to read "Luke Bellsnyder", with a long horizontal flourish extending to the right.

Luke Bellsnyder
Executive Director

Texas Products. Texas Jobs.

• P.O.Box 11510, Austin, Texas 78711-1510 • 512-330-4124 • FAX 512-330-4126 • www.manufacturetexas.org •

USA FIRST-CLASS PERMIT NO. 1000



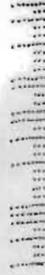
AUSTIN TX 787

19 AUG 2011 PM 3 T



TEXAS
ASSOCIATION OF
MANUFACTURERS

Administrator Lisa P. Jackson
U.S. Environmental Protection Agency
Room 3000, Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460



P.O. Box 11510, Austin, TX 78711-1510