

President Barack H. Obama
The White House
1600 Pennsylvania Avenue, N.W.
Washington, DC 20500

November 20, 2012

Re: EPA Ban on New Advanced Coal Generation Plants

Dear Mr. President:

We heartily congratulate you on your reelection and look forward to working with you and your Administration to achieve a stronger economy with greater employment opportunities for all Americans.

We are writing to ask that you help ensure that EPA's proposed New Source Performance Standards (NSPS) for Greenhouse Gas Emissions from fossil-fueled power plants allow for the construction of state-of-the art new coal generation plants. As proposed, this rule would mandate the application of carbon capture and storage technology that has not been commercially demonstrated in this country, and that EPA estimates would raise the cost of electricity by 80 percent.

EPA is scheduled to issue a final NSPS rule next month. Without substantial change, the proposed rule would force all new baseload generation to natural gas, abandoning our nation's largest fossil energy resource along with its jobs and infrastructure in mining, boiler and pollution control fabrication, construction, and rail transportation.

Our primary concerns are threefold:

1. For the first time in its 40 year history of issuing rules under the Clean Air Act, EPA chose to apply the same emission standard to both coal and natural gas units. This is a radical departure from past practice where EPA recognized the inherent differences between coal- and natural gas-based generation technologies.
2. Instead of being technology- or fuel-neutral, the proposed rule discriminates against new coal units by allowing new natural gas combined-cycle units to be constructed with no carbon controls. If finalized as proposed, any new advanced coal units equipped with Best Available Control Technologies for sulfur dioxide, nitrogen oxides, mercury, and other pollutants could not be financed due to the uneconomic burden of carbon capture and storage. Preventing this new construction will delay the retirement of less-efficient older coal units and result in greater emissions.
3. EPA's rule would place an unprecedented burden of addressing global climate change on one industry sector in one country. Addressing climate issues will require a much broader global effort, similar to the proposals that you brought to the 2009 United Nations climate conference in Copenhagen.

Hundreds of thousands of our members are directly employed in the electric utility, mining, railroad transportation, construction, and boiler and pollution control sectors. We are extremely concerned about the future well-being of these highly-skilled workers. Compliance with EPA regulations scheduled to take effect in 2015-16 will cause the closure of 50,000 or more megawatts of older coal generation capacity. Without a clear path forward for the construction of more efficient coal technologies, such as advanced ultra-supercritical generation, our members and their families face certain economic hardship.

We would greatly welcome your concern and involvement to help ensure that job losses among our members and their communities are minimized by a rule that provides separate, achievable GHG performance standards for natural gas and advanced coal ultra-supercritical generation.



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International President
International Brotherhood of
Boilermakers, Iron Ship Builders,
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Edwin D. Hill
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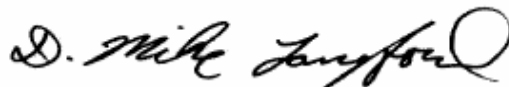
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cc: Honorable Lisa P. Jackson
Honorable Stephen Chu, Ph.D.
Members of Congress
Richard L. Trumka