

International Brotherhood of

BOILERMAKERS • IRON SHIP BUILDERS

1750 New York Ave., NW, Suite 335
Washington, DC 20006



BLACKSMITHS • FORGERS & HELPERS

202-756-2868
FAX: 202-756-2869

August 25, 2011

Representative Fred Upton, Chair
Energy and Commerce Committee
U.S. House of Representatives
Washington, DC 20515

Representative Henry Waxman, Ranking Member
Energy and Commerce Committee
U.S. House of Representatives
Washington, DC 20515

SENT VIA FAX - (202) 225-1919, (202) 225-2525

Dear Representatives Upton and Waxman,

On behalf of the International Brotherhood of Boilermakers, Iron Ship Builders, Blacksmiths, Forgers and Helpers, and specifically, on behalf of the Boilermaker members who work for many of the largest cement manufacturers in the United States, I write to you regarding H.R. 2681: Cement Sector Regulatory Relief Act of 2011.

As we noted in our letter to the Office of Management and Budget (“OMB”) on July 19, 2010, prior to the final rulemaking, Boilermaker members in cement manufacturing have been particularly hard-hit during this severe and on-going economic crisis. The substantial decline in construction, both commercial and residential, has resulted in lay-offs and plant closures for many of our cement workers. Although the U.S. economy is beginning to make slight, but positive employment gains in the private sector, construction recovery and the related jobs are severely lagging behind.

The impact of the current regulations includes the potential loss of up to 30 percent of domestic cement production capacity and the need for a significant capital investment to implement these rules – capital that could go to new cement production facilities and provide additional employment. But, under these circumstances, we see very little chance of maintaining these good paying jobs, let alone adding to them.

We also remain concerned that another unintended consequence of the current NESHAP rules will be the increased importation of cement products to make up the difference once the demand for cement products finally returns. Unfortunately, these imports will be from countries whose concern for the environment, let alone other issues such as decent wages and labor rights, is well below our own. And, as we also explained to OMB over a year ago, we have other concerns for this industry related to dumping and product quality that will only be compounded by the loss of a strong U.S.-based cement industry.

The Boilermakers fully recognize that striking a reasonable balance between two very important goals - environmental protection and job recovery - is no easy task. We appreciate the separate efforts of the Environmental Protection Agency ("EPA") and Congress to find that balance. However, on behalf of our members in the cement industry, we hope this Committee will give serious consideration to possible alternatives and approaches, including H.R. 2681, that would meet EPA's goals while preserving these much-needed American jobs.

Thank you for considering our views on this matter.

Sincerely,

A handwritten signature in cursive script that reads "Anthony Jacobs".

Anthony Jacobs
Special Assistant to the International President
Acting Director of Legislative Affairs

cc: Newton B. Jones, International President
James Pressley, International Vice-President-At-Large, Industrial Sector