American Boiler Manufacturers Association

8221 Old Courthouse Rd, Suite 202, Vienna, Virginia 22182
703-356-7172 • fax 703-356-4543 • homepage: http://www.abma.com

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TO MEMBERS OF THE UNITED STATES HOUSE OF REPRESENTATIVES:

The American Boiler Manufacturers Association (ABMA) – the companies that actually design, manufacture and supply the commercial, institutional, industrial boilers and combustion equipment in question -- strongly opposes H. R. 2250, the EPA Regulatory Relief Act of 2011 and any legislation that would further delay, by legislative fiat, the ongoing EPA rulemaking process now playing itself out with respect to the National Emission Standards for Hazardous Air Pollutants for Major and Area Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters rules.

It is imperative that the rulemaking process – already underway for over a decade -- goes forward unencumbered by Congressional intrusion and that final regulations be promulgated as soon as possible to alleviate continued and further confusion and uncertainty in the market-place and to begin generating what we expect will be new, high-tech engineering and domestic manufacturing jobs in the boiler and boiler-related sectors.

The U. S. boiler and combustion equipment industry – with decades of experience and expertise in meeting tough, state, local, regional and national air-quality codes, standards and regulations with innovative, and real-world design solutions -- stands ready and able to help those affected by these rules to comply with them in a timely and cost-effective manner. Further delays, over and above those already extended by EPA, will not necessarily result in improved rules; they will only exacerbate future compliance issues and costs; labor and materials costs are currently stable and domestic boiler and combustion equipment manufacturing capacity is available now to service the full range of compliance options available under the new rules – from simple boiler tune-ups and system upgrades and optimizations to system replacement.

The types of clean, efficient, fuel-flexible, cost-effective and technologically-advanced products and equipment that can be supplied by the U. S. boiler manufacturing industry are critically important for long-term public health, environmental quality and business stability. The ABMA urges you to vote against H. R. 2250, to let the rulemaking process within EPA go forward without Congressional interference, and to cast aside any further delaying tactics or excuses that only serve to retard growth, defer job creation and spawn confusion.

Sincerely,

W. Randall Rawson
President/Chief Executive Officer