JIM DOYLE
GOVERNOR
STATE OF WISCONSIN

August 18, 2010

Honorable Lisa Jackson, Administrator
Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460

Dear Administrator Jackson:

I am writing as a follow-up to our recent discussion of your agency's proposed Boiler MACT rule.

The importance of balancing environmental protection with economic vitality has been a central theme for my administration during my two-terms as Governor of Wisconsin. During our interactions on August 6, I was delighted to find that you shared that vision, and was impressed with the eloquence in which you spoke to the subject of sustainability and the need to balance the interests of the environment, public health, and the economy.

However, I am greatly concerned that the Boiler MACT rule currently proposed by your agency works against a sustainable future for Wisconsin and the nation. In Wisconsin's view, the proposed rule:

- Will result in significant adverse economic impacts to Wisconsin's manufacturing base by posing standards based on either insufficient data, or inconsistent and, in some cases, overly-simplistic approach that relies on a few broad source categories to establish emission rates.
- Is at odds with federal initiatives such as BCAP that are designed to rapidly expand a competitive, sustainable and reliable biomass energy market. The MACT rule, as currently drafted, has the potential to stop progress made under these programs its tracks, and defeat the Obama Administration's efforts at energy independence.
- Poses the potential to increase emissions of certain criteria pollutants, such as NOx, as a result of the pollution control approaches required for other pollutants in the rule. This could reverse the significant progress we have made in Wisconsin to reduce harmful levels of ozone.

As EPA develops a final Boiler MACT rule, I hope you will consider a balanced approach that is sustainable, protects public health and the environment and fosters energy independence, economic recovery and jobs. Thank you for your consideration.

Sincerely,

Jim Doyle
Governor

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