

Statement of Abraham F. Breehey
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International Brotherhood of Boilermakers, Iron Ship Builders,
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Proposed Amendments to the National Air Toxics Emissions Standards
for Portland Cement Manufacturing
U.S. Environmental Protection Agency Public Hearing
Arlington, VA – June 18, 2009

Good morning and thank you for allowing me this opportunity to offer a statement regarding the proposed amendments to the national air toxics standards regarding Portland cement manufacturing. The local lodges of the Cement, Lime, Gypsum, and Allied Workers Division of the International Brotherhood of Boilermakers, Iron Ship Builders, Blacksmiths, Forgers and Helpers represent more of the men and women of the cement industry than any other labor organization. Boilermakers believe that cement manufacturing can occur in an environmentally sensitive way; at the same time, we believe that cement manufacturing must remain internationally competitive in order to afford the investments in environmental protection while keeping industrial jobs here in the United States.

Our initial examination of the proposed amendments leads us to believe that EPA has not identified a single cement plant any where in the United States capable of meeting the emissions standards. If the rule is adopted as proposed, the likely result will be that increasingly high percentages of cement will be made overseas and imported into the United States. In recent debates before Congress regarding climate change, the cement industry was identified as an industrial sector uniquely susceptible to import penetration in the event of substantial increases in operation costs. The rule, unfortunately, would represent such an increase in cost.

To be clear, our union does not oppose reasonable Clean Air regulation. We represent cement workers and we also represent workers that fabricate, install and maintain air pollution control devices. That said, if cement manufacturing moves overseas, our workers will neither make cement nor air pollution control devices for those plants.

Boilermakers have been working very hard to fashion an acceptable legislative compromise regarding control of global greenhouse gases, supporting a number of proposed bills. The delegates to the 1997 AFL-CIO Convention placed the organization on record in favor of addressing global warming while opposing perverse incentives to move manufacturing capacity abroad, a result that protects neither jobs nor the environment. We are concerned this proposed rule does not meet that standard.

If cement capacity becomes increasingly unviable in the United States, and moves to lower cost, lower wage nations without any real form of environmental control, global climate change will worsen. Manufacturing cement in, say, Thailand releases more carbon dioxide given the less profound commitment to energy efficiency. But worse,

shipping cement from Thailand to the West Coast of the United States itself releases substantial amounts of additional greenhouse gases.

Even with respect to mercury emissions, the situation could worsen. First, as a general rule, foreign cement plants are less efficient and less likely to employ air pollution control devices. Therefore, mercury emissions per ton of cement made may well increase as manufacturing shifts overseas. Unfortunately, when mercury is released, it becomes part of a global cycle. EPA itself has estimated that more than three-quarters (83 percent) of the mercury deposited in the United States originates from international sources, with the remaining 17 percent coming from U.S. and Canadian sources.¹

Boilermakers are also concerned that once cement capacity moves overseas, it will tend to support economies in which workers are less likely to be organized, trained, subject to safe working conditions, and paid a livable wage. In short, if a rule is finalized that pushes cement manufacturing overseas, it will add to a cycle of exploitation.

Boilermakers also represent a strong Construction Division that is heavily involved in many of the activities associated with the President's economic stimulus package. If the manufacturing of building materials is less viable in the United States -- undermining the domestic content requirements of the Recovery Act strongly supported by organized labor -- we are concerned that each and every stimulus dollar will be less effective at creating jobs in the target markets.

At the very least, we believe that economic models employed by EPA must be specific enough to consider the potential indirect economic impacts just as the Agency's risk models purport to address indirect environmental impacts.

As I noted at the outset, Boilermakers do not oppose responsible air regulations. We have testified before Congress and the EPA many times in the past regarding our support for progressive environmental programs, regulations, and legislation. Indeed, if the EPA remains true to spirit of the Clean Air Act, and produces a rule that is achievable in practice and that takes into account all relevant factors, we would be pleased to support its implementation. Unfortunately, we think EPA has far to go before it reaches that point.

Thanks for the opportunity to offer remarks and we look forward to working with you to craft a workable rule.

¹ See EPA's Roadmap for Mercury, EPA-HQ-OPPT-2005-0013, U.S. Environmental Protection Agency, July 2006.