



*Representing the Interests of America's Industrial Energy Users since 1978*

January 9, 2008

Ms. Angela King  
Environmental Planner  
Mid-Atlantic Regional Air Management Association, Inc.  
8600 LaSalle Road, Suite 636  
Towson, MD 21286

**Re: NESCAUM Draft Reports  
“MANE-VU Modeling for Reasonable Progress Goals” (December 10, 2007)  
and “Public Health Benefits of Reducing Ground-level Ozone and Fine Particle  
Matter in the Northeast U.S. (November 14, 2007)”**

Dear Sir or Madam:

The Council of Industrial Boiler Owners (CIBO) appreciates the opportunity to comment on the two draft Reports – the Report on modeling for reasonable progress goals and the Benefits Mapping And Analysis (BenMAP) Program Study – prepared by NESCAUM on behalf of MANE-VU.

CIBO is a broad-based association of industrial boiler owners, architect-engineers, related equipment manufacturers, and university affiliates consisting of over 100 members representing 20 major industrial sectors. CIBO members own or operate facilities in every region and state of the country, with a representative distribution of almost every type of boiler and fuel combination currently in operation. CIBO was formed in 1978 to promote the exchange of information within industry and between industry and government relating to energy and environmental equipment, technology, operations, policies, laws and regulations affecting industrial boilers. Since its formation, CIBO has actively participated in the development of technically sound, reasonable, cost-effective energy and environmental regulations for industrial boilers. CIBO supports regulatory programs that provide industry with enough flexibility to modernize – effectively and without penalty – the nation's aging energy infrastructure, as modernization is the key to cost-effective environmental protection.

Many CIBO Members own or operate facilities in regions of the US that will be directly or indirectly affected by the binding decisions that will be made based on the NESCAUM analysis. As such, CIBO has an interest in ensuring the accuracy and dependability of such Reports.

CIBO shares a concern with the Midwest Ozone Group (MOG), raised in MOG's comments on the Draft NESCAUM Modeling Report. MOG notes that NESCAUM's Modeling Report

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identifies potential control measures that would "yield significant visibility benefits beyond the projected visibility conditions" after the implementation of current and planned-for control measures. CIBO supports MOG's concern that controls beyond those required to meet already stringent standards is neither justified by applicable law, nor by the significant additional burden on sources that will result. Sources have made significant capital investments to meet mandatory measures and the resulting environmental benefits will likewise be significant. CIBO supports MOG in urging NESCAUM to discontinue efforts to establish control strategies for greater-than-required reductions at this time. NESCAUM's desire to increase the compliance margin utterly fails to account for the challenges faced by regulated sources to meet existing regulatory requirements and remain viable. Such an approach unnecessarily forces capital expenditures on an accelerated schedule, imposing inappropriate economic burdens and creating a competitive disadvantage in that Regional Transport Area compared to other Areas, and increasing the competitive disadvantage in international markets.

If you have questions or need clarification, please contact me at (703) 250-9042.

Sincerely yours,

*/s/ Robert D. Bessette*

Robert D. Bessette  
President