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July 29, 2009

Re: Docket ID No. EPA-HQ-OAR-2002-0051

AUG 06 2009

EPA Docket Center (6102T)
National Emissions Standards for Hazardous Air Pollutants from
Portland Cement Manufacturing Industry Docket
Docket ID No. EPA-HQ-OAR-2002-0051
1200 Pennsylvania Ave. NW
Washington, DC 20460

Dear Docket Administrator:

On behalf of the Baker County Economic Development Council, I would like to express our support for the creation of a sub-category within the Maximum Achievable Control Technology (MACT) Rule allowing the EPA to address the variation of naturally occurring mercury in the limestone of Western cement plants like the one in Durkee, Oregon.

Over the years, Baker County, Oregon has had its share of economic setbacks. In 1995, Ellingson Lumber Company, the county's largest and oldest (over 100 years) manufacturing employer ceased operations. The resulting loss of jobs both direct and indirect was dramatic and swift. From 1995 to 1996, Baker County's unemployment rate went from 8.2% to 11.6% almost doubling Oregon's unemployment rate of 5.9% for the same year.

Today, the citizens of Baker County find themselves in an economic situation that suggests a plausibly similar outcome. Once again, one of Baker County's most significant private employers is at risk. The negative economic impact that the closure of the Durkee Cement Plant would have on Baker County's economy would be staggering.

The loss of one job in rural Oregon has the economic impact of 125 jobs in the Portland metropolitan area, according to the regional economist for the Oregon Employment Division. Based on the department's figures, the closure of the Durkee plant would be equivalent to losing 14,500 jobs! It would be as if Klamath Falls lost Jeld-Wen, Bend lost Schwab Tire Centers, Salem lost Epic Aviation, and Portland lost the Hoffman Corporation all at the same time. More succinctly, it represents all the jobs lost in the State of Oregon over the last year - the worst economic slowdown in 25 years.

Unfortunately, this time the consequences also have national implications. Ash Grove Cement operates nine cement plants in the United States, making it the largest American owned cement plant operating in the United States. The closure of the Ash Grove Plant/s would not only have a devastating effect on Baker County's economy, it would also lead to the need to import cement from overseas, sending American jobs off shore.

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