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To: John F. Morrall III/OMB/EOP@EOP

cc:

Subject: EPA's MP&M Rule Overregulates

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Hal Hawk  
President  
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May 10, 2002

Office of Management and Budget Office Information and Regulatory Affairs  
Office of Information and Regulatory Affairs, OMB, NEOB, Room 10235 725 17th Street, NW,  
Washington, DC 20523

Office of Management and Budget Information and Regulatory Affairs:

EPA has not made any justifications for the need for a new rule. Further, the rule would add an extra layer on top of existing Federal rules that regulate these industries for the exact same industrial practices.

It is one of the most expensive environmental regulations ever proposed (**\$1.9 billion** in annualized costs). Even EPA admits that the cost far outweigh the environmental benefits (**\$0.7 billion** annually).

The economic impact of the new rule would be devastating. The total compliance cost for an average job shop is approximately 6.5% of total sales. EPA's estimate for economic impact of the proposed MP&M rule would double the existing compliance costs for metal finishing facilities.

The industry is unable to pass this additional cost on to customers due to a competitive market, in which metal finishing facilities have not been able to raise prices in over a decade.

Sincerely,

Hal Hawk  
President  
Crown Battery