INTERNATIONAL
BROTHERHOOD OF
ELECTRICAL
WORKERS

Local Union No. 278
Mike Carranco, Business Manager

"Organizing for a higher standard of living"

The Honorable Lisa P. Jackson
Administrator, Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

June 15, 2011

Dear Administrator Jackson:

The International Brotherhood of Electrical Workers Local 278 is writing to seek your help in assuring that one of the largest private construction projects pending in the State of Texas – and the largest single investment ever in the Corpus Christi area is not further delayed by uncertainty around new regulatory requirements. The International Brotherhood of Electrical Workers Local 278 continues to educate and train a highly skilled workforce through its electrical apprenticeship and journeyman training program.

We are writing about Las Brisas Energy Center, a $3 billion, state-of-the-art electric generating facility proposed for the north side of the Port of Corpus Christi's inner harbor. When completed, it will be the first major new tenant on the Joe Fulton International Trade Corridor.

During its five-year construction phase, Las Brisas will provide approximately 5,000 jobs for Texas – 1300 direct jobs and 2600 indirect jobs. After construction is complete and normal operations begin, it will continue to provide hundreds of high-paying jobs in the Corpus Christi area.

This project, however, is not only about jobs. Las Brisas will produce approximately 1200 megawatts of electricity locally, enough to power more than 850,000 homes, and thus ensure more competitive pricing and overall consumer savings on electric rates. It will be able to generate affordable electricity by using low-cost petroleum coke as a fuel source. Petroleum coke is an end product of the petroleum refining process with high heat value, and about 1.7 million tons per year of petroleum coke are generated every year in the Corpus Christi area (with greater amounts in other parts of the Gulf Coast region).

As you know, any project of this size must go through a comprehensive permitting process to ensure that it meets all environmental requirements. The environmental permitting process to date has lasted more than 3 full years, but Las Brisas has now obtained the necessary permits and approvals to begin construction. Emissions from the project will be controlled by a combination of technologies that constitute best available control technology ("BACT") under both federal and state law, including limestone injection, selective non-catalytic reduction systems, scrubbers, fabric filters, and activated carbon injection systems. As demonstrated in the permitting process, the surrounding area will continue to meet all national ambient air quality standards once Las Brisas is operational.

As for greenhouse gas ("GHG") emissions, the fact that Las Brisas will burn 100% petroleum coke makes it different from coal, natural gas, and other fossil fuel-fired power plants. Today, most of the petroleum coke generated by Gulf Coast refineries is shipped overseas, where it is burned in cement kilns, power plants, and other processes that are relatively inefficient compared to Las Brisas. By using this petroleum coke in Corpus Christi, near to where it is generated, Las Brisas will actually reduce GHG emissions by using it more efficiently and eliminating the GHG emissions caused by shipping it to distant parts of the world.

Las Brisas is supported by a broad range of public officials, state and local governments, and business and labor groups throughout the State, including the Corpus Christi Hispanic Chamber of Commerce, Corpus Christi Chamber of Commerce, the Corpus Christi City Council, Nueces County Commission, Port of Corpus Christi Authority, Del Mar Community College, LULAC, GI Forum, International Brotherhood of Electrical Workers, Workforce Solutions, and American General Contractors, to name a few. The only opposition to Las Brisas comes from national environmental groups that oppose all new fossil fuel projects and a small number of local activists.

As noted above, Las Brisas has now obtained the permits and approvals it needs to begin construction. However, construction on this "shovel ready" project has not commenced because of the uncertainty around new requirements for regulating GHG emissions. The only thing needed to pave the way for this $3 billion project – a project that will provide thousands of good jobs over the next 5 years and low-cost electricity for years to come – is a clear statement from EPA saying that its new GHG requirements do not apply to Las Brisas and that EPA will not issue an order to stop construction. The International Brotherhood of Electrical Workers Local 278 asks for your help in providing such a statement from EPA to eliminate the uncertainty that new regulations have created for this project.

Sincerely,

Mike Carranco

Mike Carranco
Business Manager / Financial Secretary
IBEW Local Union 278

cc: Members of the Texas Congressional Delegation