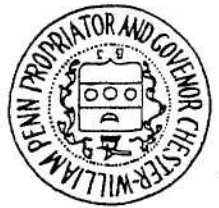




THE COUNTY OF CHESTER



Commissioners:
Carol Aichele
Donald A. Mancini
Patrick C. O'Donnell

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JOHN P. MAHER, M.D., M.P.H.
County Health Director

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Public Health Administrator



July 14, 2006

Environmental Quality Board
P.O. Box 8477
Harrisburg, PA 17105-8477



Re: Mercury Emission Reduction Proposed Regulation

Dear Environmental Quality Board:

As the Director of the Chester County Health Department, I am writing in support of Pennsylvania moving forward with the Department of Environmental Protection's State-level proposal to cut mercury pollution from coal-fired power plants 90 percent by 2015. This will provide a better quality environment for citizens of Pennsylvania much sooner than the Federal proposal.

Mercury is a heavy metal poison, which can affect human and environmental health in a number of ways. It is environmentally persistent. It bioaccumulates in the body and, worse yet, it biomagnifies as it ascends up the food chain.

The federal government has been working to have pharmaceutical companies develop mercury-free vaccines. Schools have removed it from their science labs. The healthcare professions have all but eliminated its use in medical equipment, and environmental agencies have worked with the Dental profession to capture waste mercury and reduce its presence in the waste stream.

One has to presume that, if these relatively small amounts of mercury are sufficiently worrisome to government and society to justify all these incremental steps, then the massive amounts being pumped into the environment should be all the more troubling.

Pennsylvania's power plants currently have the second highest mercury emissions in the country. Mercury contaminates rivers and lakes, and pollutes fish with this dangerous toxin. The consumption of mercury-contaminated fish can lead to serious health complications, especially in pregnant women, their unborn babies, and even apparently cause cognitive and developmental problems in pre-school children. The Chester County Health Department has a long history of being in the forefront of environmental issues and we believe that this State regulation is the right thing to do.

Additionally, the Federal proposal would weaken current federal mercury regulations by allowing polluters to trade emissions credits, which means that power plants could buy their way out of having to make substantial mercury reductions. The Chester County Health Department does not favor any proposals which would result in regional or local mercury "hot spots."

In 1996, the World Health Organization estimated that approximately 10,000 tons of mercury are released into the environment worldwide from both natural and manmade sources each year. By 1999, the U.S. EPA estimated that the electric utility industry emitted 43 tons of mercury from 1,149 units at 464 coal-fired power plants in the U.S., and projected that amount would increase, in the absence of regulations, to 60 tons per year by 2010.

In 2001, the Clean Air Council's Executive Director, Joseph Minott, stated that the largest man-made source of mercury is through release into the air from coal-fired electric power plants, and that "it only takes 1/70th of a teaspoon of mercury to contaminate a 25 acre lake to the point where fish are unsafe to eat."

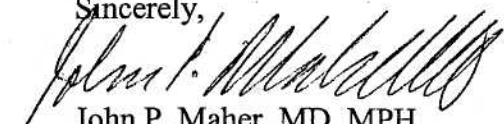
In 2004, the PennEnvironment group said that 45% of fish sampled from Pennsylvania's lakes exceeded safe levels for women of average weight who eat two fish meals per week. Worse, 76% of fish exceeded safe levels of mercury for children under the age of 3 years.

In a February 10, 2005, Editorial the Philadelphia Inquirer stated that one of every six women of childbearing age has mercury levels which pose a risk to a fetus or nursing baby, and that 630,000 infants are born each year with unsafe mercury levels.

This must not be a partisan political issue. It should be decided on its medical, environmental and public health merits. As lead was evaluated, and judged, and all but removed from our environment, so should the same process be applied to mercury emissions. We understand that four states, including New Jersey, have already proceeded on their own to legislate mercury regulations which are more restrictive, and thus more protective of the public health, than the federal proposal.

In order to protect the environment of Pennsylvania and the health of our citizens, I urge Pa. D.E.P. to reject any mercury trading program and to instead move forward in enacting its proposed State-level mercury standards for coal-fired power plants in Pennsylvania.

Sincerely,



John P. Maher, MD, MPH
County Health Director

cc: Chester County Board of Health
Joseph A. Feola, Pa. D.E.P., SERO
Rep. Carole A. Rubley