

July 25, 2006

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

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INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Members of the Environmental Quality Board,

As a resident of Allegheny County and the City of Pittsburgh, I am writing you to provide my comments regarding the DEP proposed Mercury Emission Reduction Requirements for Electric Generating Units (#7-405). I strongly support the implementation of the DEP's mercury reduction rule.

Mercury has long been known to have toxic neurological and developmental impacts for both people and wildlife. Unfortunately, Pennsylvania is ranked only second in the nation for mercury pollution from power plants, emitting a frightening 6,000 pounds of this toxin each year. Much of this mercury is deposited in local waterways, and is absorbed by fish that are later caught and eaten by Pennsylvania residents. This places Pennsylvanians, particularly women and children, in a very precarious position. Even small blood levels of mercury in a mother, may cause serious harm to embryos and developing fetuses during pregnancy.

The EPA's proposed cap and trade program, as submitted in SB 1201, in no way protects Pennsylvanians from the serious toxicological impacts of mercury emissions. While a cap and trade program may result in a *national* reduction of mercury emissions, it may only stand to intensify local accumulation of this dangerous toxin. Pennsylvania power plants are currently the largest purchasers of pollution allowances in the country. It is safe to assume that the purchase of mercury allowances would follow the same trend, exposing Pennsylvanians to unsafe, and *unfair* levels of this dangerous neurotoxin.

This illustrates only one way in which the people of this commonwealth will pay for SB 1201. As allowances are bought and imported to Pennsylvania, hotspots surrounding power plants will continue to grow in toxicity. There are already 207 waterways in Pennsylvania, in which the fish contain too much mercury to eat more than twice a month. As that figure rises, it is safe to assume that the number of people impacted by mercury will rise as well. According to a year 2000 study by the National Research Council, more than 60,000 children are born each year at risk to the dangerous impacts of mercury exposure. As power plants import mercury emissions into Pennsylvania, that number will begin to condense around our largest mercury sources. This will undoubtedly raise health care costs for those most at risk.

The clear solution is to implement more stringent state level standards, as the DEP has proposed in their Mercury Reduction Rule. If accepted, this proposal will take us out of the national emissions trading market, and place accountability on the shoulders of our own power plants. In addition, by eliminating the largest group of purchasers in the national market, we may be able to pressure other states and the EPA to develop stricter federal standards.

Not surprisingly, Pennsylvania utilities have raised many arguments in opposition to the DEP's proposal. They have said that implementing pollution controls will increase the cost of electricity for their customers. However, the National Wildlife Federation conducted a study in which they found that customers would only see an average increase of \$1.08 per month, should the power plants pass on the *entire* cost. That amount is hardly noticeable to customers and may even pay for itself in regional health improvement. It is, however, more important to note that there is little chance that the entire cost of pollution controls will be passed on to customers. The

Pennsylvania energy market is highly competitive and power plants have very few, to no capital costs, having paid these off long ago. It is likely that the representatives of these power plants are far more concerned about dipping into their profit margins, than about protecting their customers' pockets.

Lobbyists for power plants have also voiced a concern over job loss, creating in many workers minds, a disconnect between clean energy and a good economy. The truth of the matter is that the development, manufacturing, installation, and monitoring of pollution controls only stands create jobs, bolstering our economy instead of deflating it.

It is understandable that any business will want to protect their profits, but at what cost? Creating a dirty spin on clean energy only hurts the citizens of Pennsylvania.

Again, I urge the EQB to reject the EPA's federal mercury emissions trading program in favor of the stricter DEP Mercury Reduction Rule. Cleaning up Pennsylvania's power plants is imperative to the health of myself, my neighbors, and people living across the commonwealth.

Thank you for your time. Please send any written response to my address, listed below.

Sincerely,



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