

LOCAL UNION No. 459  
OF THE

**International  
Electrical**



**Brotherhood  
Workers**

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COMMENTS ON CHANGES TO CHAPTER 123  
REGULATING MERCURY EMISSIONS FROM POWER PLANTS  
BY  
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INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS  
BEFORE THE  
ENVIRONMENTAL QUALITY BOARD  
JULY 25, 2006  
PITTSBURGH, PA.

My name is Robert Ashbaugh and I am here today representing the 1880 members of Local 459 of the International Brotherhood of Electrical Workers in Indiana County and surrounding area.

We have about 800 members who work in five coal-fired power plants in our area-Keystone, Seward, Conemaugh, Shawville and Homer City. Our members work primarily with two generating companies.—Edison Mission and Reliant Energy.

In Pennsylvania the IBEW has 2,496 members who work in coal-burning plants and over 8,786 who work in the utility industry. Total membership for the IBEW in Pa is 32,000.

The plant where I work (Homer City) has 250 employees and burns 5 million tons of coal annually and gets the bulk of coal supplies from within a 60 mile radius.

We believe this regulation will result in the premature closing of the smaller, older power plants that make up 20 percent of Pa.'s coal-fired generating capacity because it does not include a cap and trade program like the federal Clean Air Mercury Rule.

One of the plants I feel is at risk of closing is the Shawville plant I represent and that would mean the loss of family-sustaining jobs, not only at the plant, but the hundreds of others that drive coal trucks, run gas stations, work in stores and restaurants.

A cap and trade program allows power plant owners to install advanced air pollution controls on larger plants where it is more cost effective and recover part of their investment by selling the extra mercury reduction credits to smaller plants where it may be cost-prohibitive or not possible to install controls.

Cap and trade programs have been very successful at reducing air pollution that causes acid rain and ozone pollution in a cost-effective manner that protects jobs at power plants and in the coal industry. In Pa., even lead is controlled using a cap and trade program. I think it is important to point out that Pennsylvania's power plants have already made large reductions in mercury emissions, in particular, at the power plants I represent.

The mercury emissions from Homer City, Keystone and Seward have been reduced by an average of 47 percent since 2000.

I include a table in my testimony showing the reductions.

**Mercury Reductions at Local 459 Power Plants\***  
(in pounds of mercury)

	Start	Most Recent	Difference	Reduction
Seward ('01-'04)	175	3	172	98%
Homer City ('00-'04)	1,369	658	711	53%
Keystone ('01-'04)	1,300	832	468	36%
Conemaugh**				
Total Reduction 3 Plants	2,844	1,493	1,351	47%
Total State EGUs ('99-'04)	9,958	6,640	3,318	33%

Based on U.S. EPA and Toxic Release Inventory numbers.

\*\* Information not available.

In addition to these reductions, the owners of Keystone just announced this month they will be investing another \$350 million in air pollution controls to reduce mercury and sulfur emissions. Statewide, mercury emissions from power plants in Pennsylvania fell by 33 percent between 1999 and 2004.

I mention these reductions in mercury because one of the reasons the Department of Environmental Protection has given for not including a cap and trade program in this regulation is because they believe mercury emissions from power plants cause "hot spots" of mercury around the plants.

Based on the experience we have at our plants and on information from DEP mercury monitors near our plants, we find this not to be true.

While our plants had a 47 percent reduction in mercury emissions, those reductions did not show up at a monitoring station at Portage in Cambria County, directly down wind from our plants. In fact, the 33 percent reduction in mercury emissions from power plants across the state did not make any difference to DEP's mercury monitors.

The reason is simple—mercury emissions from power plants make up only 1 percent of global mercury emissions and mercury travels hundreds of miles before it falls to the ground.

Mercury is a national and international problem that should be treated that way. We can't put a dome over Pa. and adopt our own regulations thinking that will clean up the air.

I think we need the answers to a couple basic questions concerning any regulations to regulate mercury emissions from power plants—

1. What are the real health and environmental benefits of adopting a rule like DEP proposed versus the federal rule with a cap and trade program?
2. What are the costs of adopting a rule like DEP's to electric generators, in lost jobs at power plants and in our communities and to the price of electricity versus the federal program?

During the heat wave last week we were all reminded how important electricity is. We saw one of the highest demand ever for electricity in Pa. and the region last Monday and Tuesday. Now imagine that 20 percent of our coal-fired power plants were not available to meet that demand for electricity because of the mercury rule proposed by DEP.

There are three things that greatly concern those of us in power generation that we feel that DEP should re-evaluate:

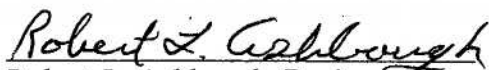
1. State regulation on percentage of reduction of 90% versus Fed regulation of 70%.
2. The lack of a cap and trade program under the state proposal.
3. The time allotment to meet standards of the state versus federal requirement.

As members of the IBEW we are very proud of the work we do and are very conscious of the public's health and safety. We, too, live in these areas with our children and grandchildren.

This is a complicated issue, but we have to work together to find a solution that cleans up the environment, without threatening jobs, and in a way that allows us to meet our demands for electricity when needed.

I want to thank you for the opportunity to testify. Thank you.

Submitted by:



Robert L. Ashbaugh, Business Representative-IBEW—Local 459