

Testimony presented at the Pennsylvania Department of Environmental Protection Public Hearing on proposed regulations to control emissions of mercury from power plants

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Presented by Barbara Litt
6567 Bartlett St.
Pittsburgh, PA 15217

resident since 1995

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Good afternoon. I am here today representing only myself, as a private citizen, to testify in favor of the PA DEP's proposed regulations to control mercury emissions from power plants. I hold a master's degree in Energy and Resources from UC Berkeley. From 1986 to 1992 I worked in the field of environmental health, for the New Jersey Department of Environmental Protection, so I am conversant with the many issues involved in setting such regulations.

Mercury is a well-documented, potent neurotoxin. This knowledge comes not from hypothetical laboratory studies in rats, but actual human death and sickness, for example, seen in thousands of victims in Minamata, Japan in the 1950s. Developing fetuses and young children are most at risk, and poor performance on neurobehavioral tests has been associated with low-dose prenatal mercury exposure. The main pathway for human exposure to mercury in Pennsylvania is consumption of fish with high concentrations of methylmercury. Rivers and lakes in the state are under advisory because fish living in them have bioaccumulated high levels of methylmercury. The main source of this bioaccumulated mercury is emissions from power plants in the state (the PA DEP estimates that about 78% of all mercury emissions in PA are from power plants). While a fraction of airborne mercury emissions can travel far, much of them are deposited near their source.

PA DEP has had to propose its own regulations because the federal regulations are not sufficiently protective of public health and the environment. The federal regulations do not require the use of readily available control technology, do not require quick action, unfairly penalize bituminous coal users, and allow emissions trading. Emissions trading means that a dirty plant may purchase a credit to continue polluting from another plant that removes a certain amount of mercury from its emissions. The emissions trading system makes sense with a pollutant such as carbon dioxide, for which hot spots do not occur and a reduction in one place is as good as one in another place. However, for mercury, hot spots have been documented to occur near the sources. In that circumstance, an emissions trading scheme is unfair to the biota and humans near those plants.

In closing, I would also like to cite religious grounds for my position. As a Unitarian Universalist, I believe in "respect for the interdependent web of all existence, of which we are a part," and also that "each and every person is important." I believe that it is our moral duty to clean up what we can, and not to subject those unlucky enough to live near power plants to higher mercury exposures than the rest of us. Thank you.

Barbara R. Litt