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7/25/06

Comment Letter to the Mercury Regulations Hearings conducted by the Pennsylvania Department of Environmental Protection

I urge you to reduce mercury emissions beyond the federal rule announced in 2005 by the EPA Clean Air Mercury Rule. Mercury is a permanent toxin; it never goes away and our regulations must reflect this fact. We already have too much mercury in our air, soil, water, fish, and even our own flesh. Mercury causes brain damage and learning impairments; it is hurting our children here and now. We must consider the huge cost in human health from this permanent toxin when we debate the costs and responsibilities of power plants. The PA DEP is duty bound to do better than the weak and flawed federal regulations.

1. Federal percentage reduction levels are too low.

We can do much better than 70% reduction. We already have the technology to reach 90% reduction. For example, Sulfur Dioxide removal systems being installed as we speak can easily reach an 80% mercury removal rate; they could contain 90% if their emissions capacity was slightly improved upon installation. This can only happen if the PA DEP writes 90% in the regulations now. If we must retrofit the additional emission treatments, it will be more expensive and simply allow more of this permanent pollutant, mercury, to accumulate.

2. The Federal time frame is too slow.

The federal regulations allow too much pollution with 2018 as the distant target date. The technology to remove mercury exists today; we must start now to phase in its use and not continue to pollute for another 12 years. Other states, such as Massachusetts have successfully implemented a much more rapid schedule for emission reduction.

3. Trading pollution credits for a toxin like mercury is wrong.

The notion of trading toxin credits is ethically and ecologically wrong. We cannot use the success of a program to regulate a non-toxic gas such as carbon dioxide and apply it to a heavy metal like mercury. Giving power plants the continued right to release toxic levels of mercury denies Pennsylvanians our right to clean air, water, and food.

Conclusion:

It is your responsibility to set the standards for environmental and human health in this commonwealth. The power plants have the technology to meet those standards and they have the political and economic ability to install the equipment and still prosper in their business. Various economic approaches are possible such as tax incentives and federal grants for innovative pollution reduction technologies. When we consider the cost of mercury abatement, we must remember the even larger ethical and economic costs of living with poison levels we can reduce if we take responsibility now.

Sincerely,

Cynthia Walter
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