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On some things in the mercury literature, there seems to be general agreement. INDEPENDENT REGULATORY REVIEW COMMISSION

1. Mercury is toxic, especially to kids.
2. Many American women of childbearing age, 7% by one estimate, have too much of it.
3. Pennsylvania coal-burning power plants emit a lot of mercury, 6,703 pounds in 2003, according to the EPA. That was 60% of the 11,400 pounds of mercury PA sources emitted into the air that year. PA power plants emit 6.9% of all the mercury put out by American power plants, about 100,000 pounds in 2003, although only 4.3% of Americans live here. That's because we have 8%, 36 out of about 450, coal-burning power plants, and PA coal is high in mercury.
4. Most mercury put into the air by power plants falls to earth relatively close to the source. I haven't read the Steubenville, OH, study conducted by EPA but I hear it says 70% of mercury on the ground or the water can be traced to sources 400 miles or less away. Other studies say the deadly radius is much smaller. Local and regional fallout imply much of the mercury on the ground and in the water around us here in eastern PA comes from local sources, probably western PA power plants.
5. We ingest mercury by eating fish. Airborne mercury only becomes dangerous to humans when it settles into water and gets taken up by fish we eat.

These facts make me sympathize with power plant owners, members of the IBEW, coalminers, and all the other interests opposed to a PA-specific mercury rule. They complain, with justification, that the only people who'll benefit from such a rule are young women who eat a lot of PA fish. There can't be many of them, they say, because everyone knows you're not supposed to eat fish caught here. These women get their mercury, not from local but out of state fish, fresh or canned, and these fish will stay high in mercury with or without a PA rule. I wouldn't be surprised if the PA Coal Association, PCA, and the Electric Power Generation Association, EPGA, offered to hire Fish and Boat Commission officers whose sole job would be to tell people, especially young women, not to eat their catch. It might be cheaper than cleaning up their power plants.

I support the PA mercury rule being proposed by the EQB.

I suspect more young women eat PA fish than power plant owners think. No fish advisory reaches everyone. Some women are poor, and fish are free food. Eating the day's catch may be a tradition, to break which would take away some of the fun of fishing. Fish, especially their omega-3 fatty acids, are good for you.

The National Wildlife Federation says ^{Mercury} hurts reproduction of birds, especially fish-eaters like hawks and loons; river otters, recently reintroduced into PA; fish; whales; and the Florida panther, among other animals.

The federal Clean Air Mercury Rule, CAMR, is weaker than the PA rule in two ways, hence less protective of public health. First, its goals for PA are a 64% emissions reduction by 2010 and 86% by 2018, instead of the EQB's 80% by 2010 and 90% by 2015. The EPA admits bonuses for early reductions may delay full compliance with CAMR at least until 2026. These figures mean PA power plants can emit an extra 5.3 tons, as much as all PA sources emitted in 2003, more mercury between 2010 and 2026 under federal rule than under the state rule. Second, CAMR includes a trading system, allowing plants that choose not to lower their emissions instead to buy credits from plants that lower their emissions more than the law requires. Some plants may not

includes a trading system, allowing plants that choose not to lower their emissions instead to buy credits from plants that lower their emissions more than the law requires. Some plants may not lower their emissions at all, creating hotspots where fish eaters are as at risk as ever. The fact the EQB rule does not let power plants buy their way out of mercury reduction is the best reason to adopt it.

Power plants must install mercury-specific controls by 2018. Until then they can rely on sulfur dioxide and nitrogen-oxide controls that also happen to remove mercury. But these controls can't meet the 15 ton cap EPA has set on nationwide mercury emissions by 2018. As George Ellis of PCA says, the main problem with the EQB rule is timing. Equipment that has to be installed some day will have to be installed sooner. To postpone the inevitable is to risk public health unnecessarily.

Douglas Biden of EPGA says a tough PA mercury ruler could force some power plants to shut down, but Penn Future says some plants, especially those built before 1970 that are exempt from requirements of the Clean Air Act enacted that year, are too profitable to be closed. They have no modern pollution control equipment to maintain, and they sell power at a price well above their cost of generation, a price set by costlier, modern natural gas plants. Older plants can afford to install mercury controls.

It is true a tough PA mercury rule could cause some power plants to burn less local coal, because of its high mercury content, leading to layoffs of coal miners. But relatively few jobs are likely to be lost because coal mining already is mechanized, and PA coal is high in chlorine, an element that either reacts with or oxidizes mercury, making the latter easier to remove.

I don't want to seem insensitive to the layoffs and brownouts that could follow adoption of the EQB mercury rule, but the public at large may benefit. With less mercury in fish, there may be fewer kids with mental retardation and autism. Our sport fishing industry may prosper. With fewer old coal-burning power plants, the air will be cleaner, there will be fewer trips to the emergency room for breathing problems, and, free from acid rain, trees will regenerate. With less coal mining, the curse of longwall will partly be lifted.