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INDEPENDENT REGULATORY
REVIEW COMMISSION

To Hearing Chairperson:

Thank you for this opportunity to present my comments on the proposed rulemaking on mercury contamination from coal-fired electric generation plants. I am representing myself, although I am a delegate to the Pennsylvania Federation of Sportsmen's Clubs from the Keystone Rod and Gun Club of Hannastown.

I believe that "protecting the environment" must include using all means of controlling harmful elements or agents to below the tolerable levels. For mercury, more awareness is developing about its effects on health due to the reports of conferences held at the 7th International Conference On Mercury As A Global Pollutant, June 2004. 53 pages of presenter names and one line abstracts of findings appear. The US EPA representative, Katy Mahaffey, discussed its activities in "Perspective from the US".

Fish consumers are increasing in number as the benefits of this food become more recognized as low-cost nutrition and a source of important oils and proteins. As a sportsman, I have enjoyed eating fish caught in Pennsylvania streams and lakes, but am alarmed by the advice to limit intake to a meal per week due to the mercury levels measured by PA laboratories.

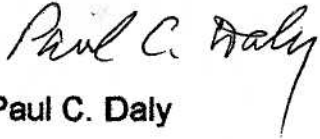
Electricity generation is increasing as our needs grow and coal burning does the same in direct proportion. The escape of mercury from even a 90 or 95% efficient flue gas cleaning keeps rising in tons per year over PA in larger amounts as generation meets demand. An attempt to moderate the growth in burning coal is being made in the construction of windmill generators. More can be added to solar panel effort and fuel cell banks. Global warming must be slowed down by reducing man-produced carbon dioxide.

I even think that not enough consideration is being given to the future. Beyond 2015, what provisions have been made?

Cap-and-trade is flagrantly ignoring the dangers from an over-the-limit plant that can be permitted to continue polluting, provided somewhere another plant might be under the limit for mercury escape. The use of bituminous coal in most PA plants, and the type of the mercury compounds it produces which are deposited as oxide forms that bacteria later convert into readily absorbable methylmercury and deposit in "hot spots" need not be a reason to buy other than bituminous coal. The cost to specifically handle mercury removal is estimated to be

\$0.000016 per KWhr, which is hardly to be a cause of "economic disaster" (as claimed in exaggeration by Sen Don White to me by letter June 30,2006). Eliminate the hot spots by more effective flue gas treatment as Chapter 123 amendments propose seems a more reasonable proposal.

Respectfully submitted,

A handwritten signature in cursive script that reads "Paul C. Daly". The signature is written in dark ink and is positioned above the printed name.

Paul C. Daly