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INDEPENDENT REGULATORY
COMMISSION
August 10, 2006

Environmental Quality Board
P.O. Box 8477
Harrisburg, PA 17105-8477

IRRC
333 Market Street, 14th Floor
Harrisburg, PA 17101

Re: Mercury Emission Reduction Requirements for Electric Generating Units (#7-405)

Comments submitted by Sandy Moser
President, Pennsylvania Chapter of Republicans for Environmental Protection

The Pennsylvania Chapter of Republicans for Environmental Protection strongly urges Environmental Quality Board support for a proposed rule reducing power plant mercury emissions 90 percent by 2015.

Pennsylvania's power plants put more mercury into the air in 2004 than those in all but Texas. Until now, coal-fired power plants are the only major mercury polluters that remain uncontrolled. Now is the time for a practical, but aggressive effort to reduce mercury emissions from power plants in a way that ensures a role for Pennsylvania coal in our energy future.

Scientific evidence shows clearly that mercury is a danger to public health and Pennsylvania's natural heritage of forests, fish, and wildlife. The United States Environmental Protection Agency (USEPA), the National Academy of Sciences, and other government authorities have identified mercury as a significant public health and environmental concern. While scientists have not identified thresholds of unsafe mercury exposure because of substantial differences in toxicity of various mercury compounds, enough is known about mercury toxicity to warrant strong mercury emissions reduction standards for coal-fired power plants.

The PA Department of Environmental Protection's proposal to reduce mercury emissions 90 percent by 2015 will ensure protection of public health and Pennsylvania's environment.

Pennsylvanians cannot rely on Washington to fix the problem of mercury pollution. It is time for common sense action not doom and gloom lobbyist rhetoric. When the Clean Air Act of 1970 was debated, Lee Iacocca, then vice president of Ford, claimed that the new regulations would end automobile production in the United States. Just as lead was removed from gasoline without ending car and truck production, addressing power plant emissions will help eliminate the mercury threat in Pennsylvania.

After recent revelations of EPA's hiding information about the health effects of mercury exposure, Republican Senator Olympia Snowe of Maine co-sponsored a comprehensive bill to control mercury emissions from coal-fired power plants and other sources. (April 6 /U.S. Newswire)

"Mercury is among the least-controlled and most dangerous toxins threatening pregnant women and children in America today," said Snowe. "Because mercury pollution knows no borders, we must institute a sensible national approach to better control its use. Our bill takes action where EPA's new mercury rule does not -- it requires every coal-fired power plant to reduce its emissions, which is the only way to reduce dangerously high concentrations of mercury in Maine and other parts of the country."

President Bush has talked extensively about a "culture of life," especially in regard to fetuses and newborn infants. Reducing environmental sources of mercury that are demonstrably harmful, especially to infants and children, should be a part of this culture. The toxic effects of both organic and inorganic mercury have been documented. Children, infants, and fetuses are at highest risk of toxicity. There is no doubt that environmental mercury should be reduced to protect human health.

As Republicans, PA-REP applauds Senator Snowe for taking action, but we all know that bill faces lobbyist hurdles and their tales of doom and gloom. In Washington D.C., the electric and coal industries have successfully lobbied EPA and Congress for 13 years to delay mandatory rules that would reduce power plants' mercury emissions. Now, these industries are pressuring the Bush administration to go even further and weaken mercury protections within the Clean Air Act, even though there is more than enough evidence of mercury's harmful effects.

It's true that some mercury comes from other countries. That's no reason for the commonwealth to sit on its hands. States are obligated to protect their citizens' health to the extent they can, and to press the federal government to work with other countries to get their mercury emissions down. Mercury can be deposited locally on land or water, or travel long distances through the air. Mercury deposited in any given locale may come from both local and distant sources, but the ratios vary from place to place.

Mercury deposits tend to be higher close to emission sources and in areas with high precipitation. As a result of the federally proposed cap-and-trade rule, for example, emissions in the upper Great Lakes states are projected to be higher in 2020 than they are today. This will surely affect Pennsylvania's citizens in the Lake Erie region.

Hot spots are a real issue. There is evidence that controlling mercury will reduce the buildup of mercury from local sources. As an example: After strong mercury controls were applied

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Hot spots are a real issue. There is evidence that controlling mercury will reduce the buildup of mercury from local sources. As an example: After strong mercury controls were applied to south Florida trash incinerators in the mid-1990s, mercury fell dramatically in wildlife in the nearby Everglades. This was confirmed by research conducted by the University of Florida.

Pennsylvania Republicans for Environmental Protection members realize that there is an increasing demand for power, that coal is plentiful in the United States, and that retrofitting old power plants with technology to reduce emissions will be costly. We are confident that this standard can be met with available technology. The leading technology for removing mercury from exhaust gases is basically the same as the technology used on large municipal waste combustors.

With the evidence in hand regarding mercury's hazards and with the lack of federal action so far, the commonwealth must take the lead in protecting Pennsylvania citizens and our environment. Pennsylvania can be a national leader in pushing technologies that will capture mercury emissions from power plants. By cleaning up coal, we can continue to use this abundant energy source without endangering public health or the environment.

We call upon the PA DEP to adopt rules to sharply reduce emissions of mercury to the air in Pennsylvania.