

Maine Council of Trout Unlimited



March 1, 2004,

Administrator Mike Leavitt
United States Environmental Protection Agency
EPA Docket Center (Air Docket)
U.S. EPA West (6102T)
Room B-108
1200 Pennsylvania Avenue NW
Washington, DC 20460

Re: Proposed National Emission Standards for Hazardous Pollutants; and, in the Alternative, Proposed Standards of Performance for New and Existing Stationary Sources: Electric Utility Steam Generating Units; Docket ID No. OAR-2002-0056, 69 Fed. Reg. 4652 (January 30, 2004).

Dear Administrator Leavitt:

EPA's current proposal to regulate hazardous air pollutants emitted by the electric utility industry does not adequately protect public health or our fisheries. It is important to Maine Trout Unlimited members that the electric utility industry takes responsibility for its harmful emissions.

Congress specifically lists mercury as a hazardous air pollutant in section 112 (b) of the Clean Air Act because of its toxic nature and its health effects. Toxic air pollutants must be regulated so as to require the maximum achievable control technology (MACT) at every source. The Maine Council of Trout Unlimited is concerned about EPA's proposal to allow trading of this toxic material.

All of the New England states have Statewide Mercury Advisories and within the State of Maine's Open Water and Ice Fishing Regulations book is a warning about eating freshwater fish:

Warning: Mercury in Maine freshwater fish may harm the babies of pregnant and nursing mothers, and young children.

The proposed mercury MACT rule should require emissions reductions from all coal-fired power plants by 2008 that are equivalent to the level that can be achieved by the most up to date pollution controls. We strongly urge the EPA to adopt a rule that will protect human health and our fisheries.

Sincerely,


Greg Ponte
Council Chair
Maine Trout Unlimited