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C-003



MR 27662

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Environmental Permitting Manager

October 15, 1999

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Environmental Protection Agency
OPPT Document Control Office (DCO)
East Tower
Room G-099
Waterside Mall
401 M Street, S.W.
Washington, D.C. 20460

1999 OCT 18 AM 11:33
RECEIVED
OPPT DCO

Re: Comments on Draft North American Regional Action Plan on Mercury (OPPTS-00276)

Dear Madam/Sir:

TXU Business Services submits the following comments on behalf of TXU Electric concerning the Environmental Protection Agency's (EPA) draft North American Regional Action Plan on Mercury as published in the Federal Register on September 16, 1999. The principal business of the Texas Utilities Company System (hereinafter referred to as TXU) is the production, transmission, and distribution of electrical energy and the transmission and distribution of natural gas in north, central, east, and west Texas to approximately one-third of the population and area of the State.

TXU commends the international efforts that are underway to establish environmental cooperation among Canada, Mexico, and the United States. However, TXU strongly opposes any action on mercury emissions until national regulatory determinations are complete. Specific comments are provided below.

- The National Academy of Sciences' National Research Council has formed a committee on the toxicological effects of mercury to review the status of mercury research and the extent to which human health impacts are understood. TXU urges EPA to delay any decision on mercury emissions until the National Academy of Sciences has completed its study.
- There are continuing studies in the Seychelles and Faroe Islands on the health effects of mercury intake from fish consumption. In addition, EPRI (formerly the Electric Power Research Institute) is currently conducting a study with the Department of Energy and selected utilities on the factors that appear to be associated with observed speciation in mercury emissions from utility stacks. TXU believes the study will result in more timely and cost-effective data. These studies are several years from completion. Any conclusions drawn about mercury should await completion of these investigations.

- Action Item 1(a) calls for a 50% reduction in mercury emissions by the year 2006. There are currently no effective utility controls to meet this requirement. Further research is needed to develop effective control technologies and to identify the most efficient technology options.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul L. Zweiacker". The signature is written in a cursive style with a large initial "P".

Paul L. Zweiacker