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EPA: Extreme Punishment Authority

CFACT op-ed in *Washington Times*: New air-pollution rules will impose exorbitant costs for illusory health benefits

The Washington Times

By Paul Driessen & Willie Soon

On Dec. 16, Environmental Protection Agency Administrator Lisa P. Jackson released new Clean Air Act National Emission Standards for Hazardous Air Pollutants. Once again, she touted the supposedly huge benefits of controlling emissions of mercury and other air toxics from coal- and oil-fired power plants and electric generating units (EGUs).

This final rule will be one of the most expensive ever devised by EPA. The actual benefits, however, are minimal to imaginary. Americans should no longer tolerate being penalized by the "Extreme Punishment Authority."

EPA itself says the purported "hazards to public health" from mercury and non-mercury emissions from American EGUs are "anticipated to remain after imposition" of the new regulations.

EPA computer models claim mercury emission cuts will reduce average per person "avoided IQ loss" by an undetectable "0.00209 IQ points," with estimated "total nationwide benefits" of \$500,000 to \$6.1 million by 2016. Job creation from the rules, it says, will be "not statistically different from zero."

EPA also confessed that U.S. power plants actually contribute a mere 3 percent of the

total mercury deposited in computer-modeled American watersheds and subsequently, in fish tissue. Citizens will justifiably wonder where the other 97 percent comes from, and why we should spend so much money for so little benefit.

To see how extreme EPA's scenarios are, consider five more egregious errors in the final regulations.

First, the EPA admitted it could "calculate risk" for only 3,100 (4 percent) of the 88,000 watersheds in the continental U.S.

Second, for more than 60 percent of the 3,100 watersheds it modeled, EPA took only one or two fish-mercury measurements, making it virtually impossible to adopt valid fish-mercury values. There is a breaking point where extremely poor statistical sampling renders EPA's pretentious number-crunching, conclusions and rules invalid. That breaking point has clearly been reached.



Third, the agency's estimates for mercury exposure risks are solely for "hypothetical female subsistence consumers" who daily eat almost a pound of fish that they catch in U.S. streams, rivers, and lakes over a 70-year lifetime (less than 1 percent of U.S. women). For the rest of American women, who eat mostly ocean fish purchased at a grocery on a far less frequent basis EPA's rules are irrelevant.

Fourth, EPA admitted that only 22 to 29 percent of its computer-modeled watersheds are "at risk" from EGU mercury, even when it erroneously assumed that at least 5 percent of total mercury deposition into the watersheds came from U.S. power plants. If the modeling criteria were tweaked only slightly - to reflect actual average freshwater fish consumption rates for American women and require that at least 15 percent of total mercury deposition be attributable to EGUs - not one U.S. watershed would be at risk.

Finally, EPA ignores the presence of selenium in nearly all fish. Its strong attraction to mercury molecules protects fish and people against buildups of methylmercury, mercury's biologically active and more toxic form.

Combining any series of small-probability scenarios results in a near-zero likelihood that the events will actually happen. If each of five scenarios has only a 20 percent chance of happening, the likelihood of all five happening is 0.032 percent.

As the preceding analysis suggests, the probability that all the EPA's improbable scenarios will actually happen is virtually zero; the likelihood that its new regulations will

benefit human health is also zero.

However, EPA still stubbornly "disagrees that [mercury] exposure levels in the U.S. are lower than those in the Faroe Islands." Exposure to methylmercury in the United States is "the same" as in the North Atlantic's Faroe Islands, EPA insists.

The agency is simply wrong.

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