NESCAUM
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The Clean Air Association of the Northeast States
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Arthur N. Marin, Executive Director

January 18, 2006

Ted Michaels, President
Integrated Waste Services Association
1331 H Street N.W., Suite 801
Washington, D.C. 20005

Dear Mr. Michaels:

Thank you for your December 7, 2005 correspondence regarding NESCAUM's October 2005 internal draft report, "Inventory of Anthropogenic Mercury Emissions in the Northeast." As the Integrated Waste Services Association (IWSA) notes, NESCAUM strives to create accurate reports and we welcome comments that help us to achieve this aim.

Inventory documentation was undertaken to satisfy two primary objectives. First, the inventory was intended to assess progress in meeting the goals of mercury emissions reduction that were set forth in the New England Governors' and Eastern Canadian Premiers' (NEG/ECP) 1998 Mercury Action Plan. Based on the current state of knowledge, the NEG/ECP agreed to a regional goal to virtually eliminate anthropogenic mercury emissions to the environment. Interim goals of a 50% reduction in mercury emissions by 2003 and a 75% reduction by 2010 from the 1998 baseline were also established. The inventory represented in the report is intended to reflect mercury emissions in 2002. Second, the inventory was designed to be used in atmospheric deposition modeling.

IWSA offers two major observations regarding NESCAUM's draft report. Of key concern, the inventory report does not provide the most recent inventory available for "waste-to-energy" facilities (termed municipal waste combustors in the draft report). The continued success of this sector in reducing its emissions is laudable. Nonetheless, the report is meant to reflect emissions as of 2002, and not more recent values. The report attempts to offer a snapshot in time for all sources of mercury emissions for comparison with baseline emissions. One continuing hurdle we face is assuring consistency among inventories so progress can be tracked; this includes representing the same source categories for all years compared in addition to understanding methodological changes in deriving emission levels.

IWSA also identified a second item: NESCAUM's decision to not report mercury emissions from landfills. We recognize that omitting source categories may influence the relative importance of other emission sources. However, US EPA's estimates of emissions from landfills were quite small for the region (about 13 pounds per year or 0.3% of the area source total, where area sources were less than 20% of the total inventory). Although we are aware of mercury

emission studies from landfills,[1] given the available first order estimate of the emissions, it did not seem a prudent use of resources to pursue our own assessment for this report. Notably, these recent reports do indicate earlier estimates from landfills may be low.

Although we chose not to include estimates at this time, we do not feel the report indicates this source category is negligible. To the contrary, we realize that as the major point source emissions continue to decline, other categories will rise in importance, including landfills, and we will make every attempt to include improved emission factor data in future regional inventory development.

We thank you once again for your comments regarding our draft report. We did make minor changes in wording in the final version that have addressed some of your concerns, in addition to other updates in the inventory numbers themselves. As we continue to move forward on reducing mercury emissions to our environment, we are pleased to see IWSA's ongoing interest and efforts in minimizing emissions from the waste sector.

Sincerely,

John Graham, Ph.D.
Senior Scientist

[1]e.g. Lindberg, S.E et al., 2005. Gaseous methyl- and inorganic mercury in landfill gas from landfills in Florida, Minnesota, Delaware and California. Atmos. Env. 39, 249-258 and Lindberg, et al, 2005. Airborne Emissions of Mercury from Municipal Solid Waste. I: New Measurements from Six Operating Landfills in Florida. J. Air & Waste Manage. Assoc. 55:859-869.