

Illinois Pollution Control Board
100 W. Randolph Street
Suite 11-500
Chicago, Illinois 60601

Re: Comments on Proposed Mercury Emission Controls for Electric Generating Units In Illinois—R06-25.

Honorable members:

These comments are submitted on behalf of the Illinois Coal Association. The ICA is made up of 16 coal producers that operate 20 mines employing 4,000 workers. In 2005 those mines produced 32 million tons of coal. The Illinois Coal Association registers its opposition to this mercury rule.

All the coal-burning power plants in the United States emit about 48 tons of mercury each year. This represents only 1% of the world's annual output of mercury. The 3.5 tons of mercury from Illinois power plants represent only .07% of the total mercury emissions. The major sources of mercury emissions are volcanoes, forest fires, the ocean and decaying matter. Moreover, mercury can be transported in the atmosphere thousands of miles before depositing to land and water. What is being solved when over 99% of the substance will still remain?

Also, imposing a state mercury standard more restrictive than the national standard will put Illinois' 57 coal burning power plants at a competitive disadvantage with plants in the rest of the country. Some utilities will be forced to close down power plants resulting in lost jobs and creating a negative impact on the local economy.

There is no question that mercury is a harmful toxin and ways to remove it from the atmosphere need to be pursued. The mercury standard in this rulemaking will provide negligible, if any environmental benefits beyond the federal mercury rule while causing a negative impact on the state's economy. The federal mercury rule, requiring a 70% reduction in emissions, is a more sensible and responsible approach to solving this global problem. We urge you to reject the Agency's rule.

Sincerely,

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