

August 10, 2012

PC# 2-194

RE: **PCB 2012-126 (Variance-Air)**
Ameren Energy Generating Company's Newton Power Station.

Thank you for the opportunity to provide comments on behalf of Prairie Rivers Network and our members in opposition to the proposed air variance for the Ameren Energy Generating Company's Newton Power Station. Prairie Rivers Network is the state affiliate of National Wildlife Federation, a non-profit organization that strives to protect the rivers, streams and lakes of Illinois and to promote the lasting health and beauty of watershed communities. Much of our work focuses on how environmental policies are implemented and enforced in Illinois in order to protect our environment and ultimately, our health.

Prairie Rivers Network shares these comments as the basis for our opposition to this proposed extension:

- 1) Petitioners have failed to demonstrate that installing scrubbers is technically infeasible and economically unreasonable. Ameren hasn't even committed to a definite plan to come into compliance with the multi pollutant standard. Instead, Ameren's plan to finish installing scrubbers is based on a speculative improvement in the market for coal generation. This is not consistent with the guidance for when a variance to an adopted standard is appropriate for approval by the Illinois Pollution Control Board.
- 2) Ameren is not offering the State of Illinois any environmental benefits. Instead, it's asking the Board to allow it to continue to run unscrubbed coal plants through at least the end of the decade. If this extension is approved, even more pollution will be released into the air and even more people will face threats to their health. Currently, the air pollution that is released from the Newton facility kills about 25 people per year, per the Toll from Coal report that was released last year.
- 3) Ameren should have anticipated and remedied this problem years ago. Ameren agreed to the Multi-Pollutant Standard in 2006 and benefitted from it. Ameren received additional time to reduce the mercury emissions from its fleet of coal plants in exchange for its promise to reduce emissions of other pollutants. Now, Ameren wants to back out of its side of the bargain and to delay fully meeting the MPS's SO2 emission limits until at least 2021.
- 4) Most importantly, if Ameren receives this variance, a very bad precedent will have been set. If Ameren can get an extension, what is to prevent every other coal company in Illinois from asking and receiving an extension on installing their pollution controls?

Clearly, other utilities in Illinois have been able to install scrubbers according to schedule.

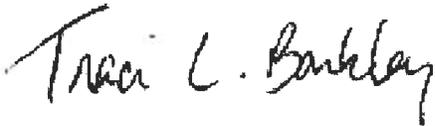
- 5) Finally, the Illinois Pollution Control Board cannot grant a site-specific rule that is inconsistent with federal law. The Petition must demonstrate that the Board may grant the requested relief consistent with federal law governing the subject of the proposal.

Thank you for your consideration of our comments. Prairie Rivers Network hereby urges the Illinois Pollution Control Board to DENY Ameren's request for a proposed variance to the multi-pollutant standard at their Newton Power Station.

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Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink that reads "Traci L. Barkley". The signature is written in a cursive, flowing style.

Traci L. Barkley
Water Resources Scientist