



# Sierra Club

## Illinois Chapter

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### **COMMENTS OF THE SIERRA CLUB, ILLINOIS CHAPTER ILLINOIS POLLUTION CONTROL BOARD REGARDING R01-10**

**November 6, 2000**

Please accept these comments on behalf of the Sierra Club, Illinois Chapter, representing over 23,000 members in Illinois.

From our perspective, the current proliferation of natural gas-powered electric plants raises serious concern for air quality, water quality, and water quantity.

Regarding water quantity; the relatively sudden proposals for new power plants that consume large amounts of water have exposed a gaping hole in the State's efforts to protect our water resources. While it has been established that the State has the authority and the legal obligation to protect natural conditions in Illinois waterways, this authority has not been utilized. In particular, no approval by the State is currently required by the Office of Water Resources for most new withdrawals of ground or surface water. With strong competition for existing water sources, an active state role in managing water use is essential. Specifically, state approval should be required for any new withdrawal from surface or groundwater sources exceeding 10,000 gallons per day.

The primary water quality concerns from these facilities result from the potential for substantial discharge of process water. These discharges, no matter how clean, could significantly degrade the habitat of a smaller stream by changing the flow regime. The discharge of heated water can also degrade habitat for aquatic life. Fortunately, the State does have the National Pollutant Discharge Elimination System in place to provide some framework for regulating these threats, but improvements are needed. In particular, strong antidegradation rules (currently the subject of another Board proceeding) should be adopted to protect streams against these new discharges.

While generating electricity from natural gas is much cleaner than generating power from coal combustion, there are air quality considerations in this debate as well. In particular, clearly the time has come for the State to reconsider the current exemption of new pollution

sources in the Chicago nonattainment area from Reasonably Available Control Technology (RACT) requirements. As a result of this exemption, neighbors of these newer power plants get significantly less protection than they would if they lived near the same plant in another nonattainment area. We also recommend consideration and adoption of more protective emissions standards for these facilities, as are currently required in California, for example.

We believe that natural gas-fired power plants have a role in Illinois' near-term energy production mix. However, the current list of proposed new plants would produce many times more power than Illinois is projected to demand, and we do not have adequate safeguards in place to protect our air and water from this phenomenon. We support calls for an immediate moratorium on the permitting and construction of new facilities so that we can examine the policies of the state that are making our communities magnets for these facilities.