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SEP 20 2006

STATE OF ILLINOIS
Pollution Control Board

September 20, 2006

Office of the Clerk
Illinois Pollution Control Board
100 West Randolph
Chicago, IL 60601

PC 6310

Re: Comments on Proposed New 35 ILL. ADM. CODE 225, Control of
Emissions from Large Combustion Sources (Mercury); R06-25

Dear Honorable Members of the Board;

The American Lung Association of Metropolitan Chicago supports the proposed rule filed with the Illinois Pollution Control Board by the Illinois Environmental Protection Agency, as amended and including the Ameren and Dynegy proposals ("the rule"). This rule is necessary to protect the health of the citizens of Illinois and is both technologically feasible and cost effective.

The Illinois rule as drafted (including amendments and Ameren's and Dynegy's proposals), is sound and will be effective. States such as Georgia, Maryland, Massachusetts, Michigan, Minnesota, New Jersey and Pennsylvania, among others, have initiated proposals with mercury reductions from power plants similar to those in the Illinois proposed rule, demonstrating that this rule is reasonable and the bases for the rule are sound. The IEPA and proponents also made the necessary showing at the hearings and in filings that the rule is both technically feasible and economically reasonable. In particular, where 90% is not achievable with activated carbon injection (ACI) alone, other pollution control options can be used to achieve 90%, including controls for other pollutants that provide additional mercury reductions.

Finally, there is sufficient flexibility in the rule for operators to choose a compliance pathway that is appropriate for them in terms of both means and timing of achieving the necessary mercury reductions. We are especially supportive of Ameren and Dynegy's proposed multi-pollutant standard, as in addition to mercury reductions, significant reductions will also be achieved in sulfur dioxide and nitrogen oxide(s) emissions which contribute to fine particulate and ozone problems within Illinois. Reducing such emissions will improve the health of Illinois residents with lung disease.


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American Lung Association
of Metropolitan Chicago
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Nearly two thirds of Illinois residents live within areas that fail to meet current federal minimal health standards for ozone and fine particulate matter. Furthermore, there is ample scientific evidence, as indicated by USEPA staff and the Clean Air Scientific Advisory Committee, that current federal standards for ozone and fine particulate matter are not sufficient to protect vulnerable populations with an adequate margin of safety as required by the Clean Air Act.

We do not see these additional non-mercury pollutant reductions as a substitute in any way for a strong Illinois rule that will shortly be required in order for the state to comply with the federal Clean Air Interstate Rule, but appreciate the additional health benefits these emission reductions will bring in addition to the health and welfare benefits of significantly reducing mercury emissions if sources chose the multi-pollutant option for compliance with the Illinois mercury rule.

Ameren and Dynegy's support for the rule demonstrates that facilities within the State of Illinois can achieve the required reductions contained in the proposed rule in a cost-effective manner.

For these reasons, American Lung Association of Metropolitan Chicago supports the proposed rule and encourages the Board to vote in favor of the rule.

Sincerely,

A handwritten signature in dark ink, appearing to read "Brian P. Urbaszewski", is written over the typed name.

Brian P. Urbaszewski
Director of Environmental Health Programs