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September 19, 2006

Office of the Clerk  
Illinois Pollution Control Board  
100 W. Randolph St.  
Chicago, IL 60601

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

Dear Honorable Members of the Board:

I am writing to express the Northern Illinois Public Health Consortium's (NIPHC) support for the Illinois Environmental Protection Agency's proposed rule to reduce mercury pollution, as amended to include the recent agreements with Ameren and Dynegy. We understand this rule to be absolutely critical to protect the health of all Illinoisans – especially women of childbearing age, children and the unborn – and is technologically feasible and cost effective. The NIPHC, in an effort to protect the health of all northern Illinois residents and visitors, supports and endorses the reduction of all sources of environmental mercury pollution in northern Illinois and beyond.

As you know, mercury is a neurotoxin that can pass through the placenta and poison fetal brain development. Every day, thousands of developing fetuses, newborns and young children are exposed to mercury when pregnant and nursing women eat contaminated fish, or children eat fish themselves. Nationally, 6 to 10 percent of women of childbearing age are estimated to have mercury levels high enough to put their developing children at increased risk for developmental problems. Here in Illinois, that translates to more than 100,000 women of childbearing age whose blood mercury levels may exceed the federal recommended limit.

Coal plants produce 71 percent of the mercury pollution emitted in Illinois and 60 percent in the Great Lakes state as a whole. The southern Great Lakes region has among the highest mercury deposition rates in the U.S. In Illinois, mercury pollution has created severe mercury "hot spots," areas where the threat to public health is elevated. In fact, Illinois ranks fourth in the U.S. for most severe mercury pollution hot spots.

What's the result of all this mercury pollution? Fish in Lake Michigan and all Illinois waterways are contaminated with mercury. The problem is so bad that the Illinois Department of Public Health warns everyone –

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particularly pregnant women, women of childbearing age and children – to limit their consumption of fish from every lake, river and stream in Illinois.

Much of mercury pollution comes from local and regional sources. So by reducing mercury pollution at its largest sources – coal-fired power plants – we can reduce mercury concentrations in fish and lower the harmful effects of mercury exposure. In one study, for instance, reductions in mercury emissions led to an 80 percent decline in mercury contamination levels in nearby fish.

Illinois must take action on mercury pollution because a new federal mercury rule scheduled to take effect later this fall is simply too little, too late. The federal rule will perpetuate mercury hot spots like those in Illinois by allowing coal plants to continue using older technology and purchase the right to continue polluting at high levels rather than installing equipment to clean up their plants and protect our health and environment.

Illinois is not alone. Wisconsin, Massachusetts, Michigan, Minnesota, Ohio, and Pennsylvania, among others, have initiated mercury reduction proposals similar to the Illinois rule, showing the rule is reasonable and based on achievable mercury reduction goals. Affordable, readily available technology already has been shown to reduce mercury pollution from coal plants by as much as 95 percent. We don't need additional studies or research. We need to move forward now to protect the health of our children and future Illinoisans.

A large, diverse coalition of doctors, hospitals, public health officials, children's advocates, health associations and environmental groups throughout Illinois support the proposed rule before the IPCB. But what really speaks volumes about this issue is the fact that Ameren and Dynegy have already agreed to cut mercury pollution from their power plants by 90 percent in the coming years. It's time to codify their agreements in law, and to require companies like Midwest Generation that haven't accepted their corporate responsibility to do the same.

Sincerely,



Steve Curatti, MPA, LEHP  
Chair, Environmental Health Committee  
Northern Illinois Public Health Consortium