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STATE OF ILLINOIS
Pollution Control Board

ILLINOIS POLLUTION CONTROL BOARD
Springfield, Illinois (October 5, 2000)

IN THE MATTER OF:)

NATURAL GAS-FIRED, PEAK-LOAD)
ELECTRICAL POWER GENERATING)
FACILITIES (PEAKER PLANTS))

P.c #165

R01-10

Joint Testimony of the American Lung Association of Metropolitan Chicago (ALAMC) and the Illinois Environmental Council (IEC)

At the hearing on October 5, 2000 American Lung Association of Metropolitan Chicago (ALAMC) and the Illinois Environmental Council (IEC) presented testimony on R01-10. At that time there was a request from the Board to provide more information on the estimated number of premature deaths in Illinois due to the effects of airborne particulate matter. The following attempts to provide that relevant information.

On October 5th, I mentioned a report published by the Natural Resources Defense Council (NRDC) in 1996 as the source of the number of 60,000 premature deaths nationwide due to particulate matter, as well as being the source of information on deaths in the Chicago Metropolitan area. For the convenience of the Board, we have included a copy of this report with this testimony. The name of the report is BREATHTAKING: Premature Mortality due to Particulate Air Pollution in 239 American Cities and the figures quoted in our original testimony were approximations of the figures printed in this report.

For the Chicago Metropolitan Area (as defined by the Census) the estimated number of premature deaths was a range from 2075-4759, with a midpoint estimate of 3479. In our original testimony on October 5th, I stated that the number of premature deaths due to particulate levels was over 2000 annually for the Chicago metropolitan area. The report includes such estimates for eight metropolitan areas in Illinois and the estimate of total premature deaths in Illinois is based on the total from these eight metropolitan areas alone. It does not include any figures for rural Illinois counties that are not part of a metropolitan area. Hence, any total for the number of premature deaths in Illinois would count in these rural counties as well. Unfortunately, the report has no figures for these areas of the state, and if such numbers were available, they would certainly increase the total number of premature deaths

**When You Can't
Breathe,
Nothing Else
Matters**

Founded in 1906, the American Lung Association of Metropolitan Chicago serves Chicago and Cook County with education, research and advocacy programs.

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statewide from particulate matter. Our testimony indicated that there were over 3000 premature deaths statewide. The actual total from the eight metropolitan areas in the report was a range of 3052-7020 with midpoint of 5124. The figures stated in our testimony on October 5th were conservative in that they were at the extreme lower end of the range of premature deaths and well below the point estimates as well.

We would also like highlight a new report released in mid-October, 2000 that documents the connection between premature deaths and emissions from power plants nationwide. This study, The Particulate-Related Health Benefits of Reducing Power Plant Emissions by Abt Associates also breaks down the estimates of premature deaths by state and metropolitan areas. We have provided the report as well as a summary of this report titled Death Disease & Dirty Power: Mortality and Health Damage Due to Air Pollution from Power Plants. Power plant emissions alone are associated with 1,700 premature deaths annually in Illinois, as well as 1,110 hospitalizations and 33,100 asthma attacks. Numbers for the Chicago Metropolitan Area are 995 premature deaths, 648 hospitalizations and 21,400 asthma attacks. The number of deaths in Chicago ranked fourth for metropolitan areas around the country, behind New York, Washington, D. C., and Philadelphia.

Our testimony on October 5th urged the Board to begin an inquiry into the threat to public health presented by existing coal-fired power plants. These plants are grand-fathered out of ever meeting modern emission standards and now emit the vast majority of sulfur dioxide emissions statewide - emissions that form airborne fine particulate matter less than 2.5 microns (PM 2.5).

It is important to note that while the PM 2.5 standard is the subject of litigation before the Supreme Court, the health effects of PM 2.5 are not at issue. Even the District of Columbia Circuit Court of Appeals, the body that sent the case to the Supreme Court, agreed that the science shows there is a problem, and stated this in Court documents:

The numerous epidemiological studies appearing in this record, some of which EPA also used to support the 1987 NAAQS, easily satisfy the standard articulated in the statute and emphasized repeatedly in decisions of this court. Covering diverse geographic locations with widely varying mixes of air pollution, the studies found statistically significant relationships between air-borne particulates signified by a variety of indicators and adverse health effects. Given EPA's statutory mandate to establish standards based on "the latest scientific knowledge," 42 U.S.C. ss 408(a)(2), 7409(d), the growing empirical evidence demonstrating a relationship between fine particle pollution and adverse health effects amply justifies establishment of new fine particle standards.¹

In the early 1990's the Illinois Pollution Control Board opened a rulemaking on control of diesel vehicle emissions, and eventually adopted regulations that set Illinois state standards for diesel opacity. Due to the leadership of the Board, two Illinois laws now govern the testing and enforcement of this standard for diesel vehicles. The report on the health impact

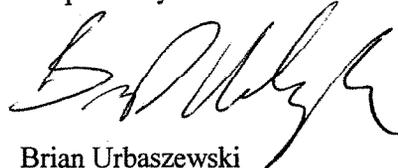
¹ From *American Trucking Assns. v. USEPA*, 175 F.3d 1055-56 (D.C. Cir. 1999):

of fine particulates released by Abt Associates on October 18 does estimate the health impact of diesel vehicles as well. Among air pollution sources, the deaths attributable to power plants are rivaled only by those due to the fine particulate pollution from the combined total of all the diesel trucks, buses, locomotives and construction equipment in the US; These sources, according to the Abt analysis, are responsible for approximately 80 percent of the deaths attributable to power plants.

It is our firm belief that there is a great need to control emissions from power plants in Illinois, and that the Board has already taken the initiative to address a lesser emission source in the state by adopting regulations to control diesel emissions is encouraging.

For the record, I would like to correct a statement on page 105 of the testimony on October 5, which states the number of people with lung disease in Cook County is "over 14,000 people." It should read "over 400,000 people."

Respectively Submitted



Brian Urbaszewski
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of Metropolitan Chicago

Dated: November 6, 2000