

February 12, 2013

Illinois Pollution Control Board  
c/o John Therriault  
Assistant Clerk of the Board  
James R. Thompson Center  
100 W. Randolph  
Suite 11-500  
Chicago, Illinois 60601

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CLERK'S OFFICE

FEB 21 2013

STATE OF ILLINOIS  
Pollution Control Board

PC# 8507

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J. Usha Raj, MD  
Professor and Head

Re: Docket No. PCB 2013-<sup>24</sup>~~126~~

Dear Members of the Illinois Pollution Control Board:

As health professionals living and working in Illinois, we support the Combined Pollutant Standard (CPS) adopted by the Illinois Pollution Control Board in 2007. By controlling power plant emissions of sulfur dioxide (SO<sub>2</sub>), nitrogen oxides (NO<sub>x</sub>), and mercury, the CPS helps protect the air we breathe, the local fish we eat, and the wildlife and natural spaces we love from harmful pollution. We are concerned by the present effort to weaken the CPS before the Illinois Pollution Control Board. We urge you to vote against any action eroding requirements of the CPS standards.

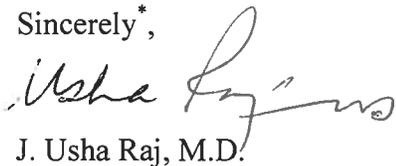
Nationally, coal-fired power plants are the largest sources of SO<sub>2</sub> and mercury emissions, and are among the largest single source emitters of NO<sub>x</sub>. Emissions of these air pollutants impact human and ecosystem health in a number of ways. High levels of SO<sub>2</sub> and NO<sub>x</sub> can exacerbate respiratory symptoms in at-risk individuals (including children and the elderly), including asthma and COPD attacks. Exposure to mercury, a potent neurotoxin, can result in developmental delays (e.g. speech, motor, and memory skills) in children, and cause nervous system damage in adults. Wildlife and plant species are also impacted by the toxic effects of these pollutants, (e.g. reproductive impacts of mercury to wildlife, SO<sub>2</sub>-derived acid rain damage to foliage).

In addition to the health impacts of directly regulated chemicals, SO<sub>2</sub> and NO<sub>x</sub> are also precursors to other harmful pollutants such as fine particulate matter and ground-level ozone. Fine particulate matter (PM<sub>2.5</sub>) is a complex mixture of solid and liquid particles, and a very large proportion of measured PM<sub>2.5</sub> results from the chemical transformation of SO<sub>2</sub> and various NO<sub>x</sub> molecules in the atmosphere. Numerous scientific studies and authoritative panels have identified PM<sub>2.5</sub> as harmful to human health, with causal linkages found between short- and long-term exposures and premature mortality and cardiovascular effects. According to a 2010 report by the National Research Council, in 2005 alone, the annual health and related damages from

particulate, NO<sub>x</sub>, and SO<sub>2</sub> cost the public \$62 billion (2007 USD). The vast majority (\$53 billion) of these costs were due to health damages associated with the transformation of SO<sub>2</sub> into PM<sub>2.5</sub>.

As it stands, the CPS is designed to require substantial reductions in the emission rates of SO<sub>2</sub>, NO<sub>x</sub>, and mercury. These reductions will allow for substantial gains in the public health of our state and surrounding regions, particularly for vulnerable populations and areas that do not meet federal air quality standards. Notably, two coal-fired power plants regulated by the CPS are in areas that the Illinois EPA has identified as not attaining federal SO<sub>2</sub> standards. By maintaining the present CPS emission rate requirements for each of the pollutants, you will ensure that the health improvements behind the spirit of the law remain intact, and that the public does not bear the costs of polluter non-compliance. We applaud you for your decision to put the CPS in place six years ago, and we ask that you continue to show your support for this standard by voting against any effort to weaken its protective power.

Sincerely\*,



J. Usha Raj, M.D.

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## **Therriault, John**

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**From:** Environmental Law and Policy Center <elpcinfo@elpc.org> on behalf of Pamela Kurtz <pgkurtz@yahoo.com>  
**Sent:** Thursday, February 21, 2013 1:10 PM  
**To:** Therriault, John  
**Subject:** Please Reject Midwest Generation's Petition for a Variance (Docket No. PCB 2013-024)

Feb 21, 2013

Illinois Pollution Control Board Members

Dear Control Board Members,

Please reject Midwest Generation's request for a variance of the historic clean air standards Illinois adopted in 2006 (docket no. PCB 2013-024). Hold the company to its previous commitment, which is vital to protecting public health and the environment.

It is the responsibility and duty of the Board to protect Illinois residents from being taken advantage of by companies like Midwest Generation, which has delayed compliance with clean air laws for long enough and which has hidden behind threats to slash jobs and close plants. As you know from the Board's earlier experience with Ameren, a variance doesn't guarantee jobs or that plants will stay open.

The people of Illinois should not have to suffer from years of extra pollution. Midwest Generation should live up to their promise to install modern pollution controls on schedule.

Sincerely,

Mrs. Pamela Kurtz  
124 S Williston St  
Wheaton, IL 60187-5851

**LULAC**

*Representing the Civil Rights, Educational Rights & Immigrant Rights of Hispanic Americans across the USA*

Fax: 312-814-3669

February 21, 2012

Chairman Thomas Holbrook  
Illinois Pollution Control Board  
100 W. Randolph St.  
Chicago, Illinois 60601

**RECEIVED**  
CLERK'S OFFICE  
FEB 21 2013  
STATE OF ILLINOIS  
Pollution Control Board

Re: **Midwest Generation Waukegan Plant**  
**Docket No. PCB 13-14**

Dear Chairman Holbrook

Please be advised that LULAC of Waukegan supports Midwest Generation's request for temporary relief from Illinois pollution control regulations (Variance, Docket No. PCB 13-24).

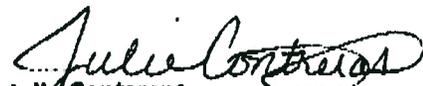
Midwest Generation is a major provider of jobs — at its plants and at Illinois businesses that supply them with products and services. Nearly 65 percent of its 850 employees are union members, and hundreds of union members in the building and construction trades also work on special projects in the plants — such as installing new pollution controls.

Granting the variance can help sustain the positive impact of the company's operations on local communities and businesses and help preserve property tax revenues for education and municipal services.

The Latino community in Waukegan has appreciated through the years the positive presence of Midwest Generation and the many educational programs focusing on electricity and the environment that they have shared with the youth.

Even if granted the variance, Midwest Generation would still hit the original state emissions targets by the end of the program in 2019, and will reduce emissions from 2013-2016 more than was expected when current regulations were adopted.

We would like to thank you in advance for your time and consideration to this matter.



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