

November 24, 2008

Mary Ann Dolehanty, Acting Permit Section Supervisor
Michigan Department of Environmental Quality
Air Quality Division
P.O. Box 30620
Lansing, MI 48909-7760

Re: Draft Permit to Install, Permit No. 317-07, Wolverine Power Supply Cooperative, Inc.

Dear Ms. Dolehanty,

I am writing about the mercury that will be released by Wolverine's proposed coal plant and the impact it will have on the development of Michigan's children. Please accept this letter as my comments on the Draft Permit to Install for Wolverine Power Supply Cooperative. MDEQ must deny the Permit because it fails to meet the requirements for control of mercury contained in the federal Clean Air Act and Michigan state laws. The public notice for the Proposed Coal Plant states that written comments will be accepted through November 24, 2008. Therefore, these comments are timely submitted.

Michigan can take action to reduce a needless cause of neurological damage that puts Michigan children at a disadvantage from the start: mercury pollution from coal plants. MDEQ can protect Michigan children from the threats of mercury by denying Wolverine's proposed permit.

Mercury is a neurotoxin that causes neurological delays and damage. Mercury is of special concern to children and women of childbearing age. The risk to women is the impact that mercury has on babies in the womb. In utero exposure to mercury, via contaminated fish eaten by the expectant mother, can impair thinking, memory, attention, language, and fine motor and visual spatial skills. Similarly, children who eat mercury-contaminated fish are at risk for decreased brain function.

The mercury pollution from existing coal-fired power plants in Michigan already causes severe health problems for Michigan residents, especially its youngest members. There is an existing statewide mercury fish consumption advisory for all inland lakes, reservoirs and impoundments that severely limits the amount of certain fish that people should consume, caused in part by the emission of nearly 2000 pounds of mercury per year by coal-fired power plants in the state. Wolverine proposes to emit 47 pounds more every year for the next 50 years, which will further damage area lakes and rivers. The burden of Wolverine's mercury pollution stands to fall especially hard on tribal members, who rely on fishing Michigan's waters. Allowing this additional mercury pollution from the Wolverine plant will just worsen the health threat already posed by mercury.

By law, this permit must be denied because the mercury pollution controls that Wolverine proposes for the plant do not meet Clean Air Act legal requirements. For mercury, the Clean Air Act required controls are Maximum Available Control Technology or MACT. The mercury

controls proposed by MDEQ do not meet these requirements because MDEQ didn't provide a sufficient MACT analysis and arbitrarily and without reason rejected lower mercury limits that other plants are proposing to meet. Nor did MDEQ meet its obligations under the Governor's Environmental Justice Executive Directive by reducing impacts to tribes.

Wolverine's proposed coal plant just makes what is already a bad mercury problem in Michigan worse and this permit must be rejected.

Sincerely,

SIGN LETTER WITH THE FOLLOWING REQUIRED INFORMATION *

Your Title (e.g. Mr., Ms., Dr.):

Your Full Name:

Your Company Name (if applicable):

Your Full Mailing Address (include ZIP Code):

OPTIONAL INFO

Your Daytime Phone No. (include area code and extension):

Your E-Mail Address (provide if you wish to be notified of future updates regarding this application):

* This information is required, by the rules of public comment