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CITIZENS ENVIRONMENT ALLIANCE
of southwestern Ontario

May 12, 2010

Mr. William A. Presson
Acting Permit Supervisor, MDNRE, Air Quality Division
Lansing, MI 48909-760
Via Fax: 517-373-1265

Re: Detroit Edison – Monroe Permit No. 93-09

The Citizens Environment Alliance objects to the proposal by Detroit Edison to modify the Monroe Power Plant to burn sub-bituminous coal and petroleum coke and urges the DNRE to reject the permit based upon the significant adverse and cumulative emissions that the facility contributes to Lake Erie and downwind communities.

The EPA's 2008 Toxics Release Inventory (TRI) report for the Monroe Power Plant notes more than 20 million pounds of on-site disposal or other releases from the facility. A study by pollutionwatch.org notes that Lake Erie received the highest volume of pollutants of any of the Great Lakes from matched TRI and National Pollutant Release Inventory facilities in the Great Lakes basin. (www.pollutionwatch.org *Partners in Pollution 2*, PollutionWatch, March 2010). The Monroe Power Plant had the highest air releases in the Lake Erie and Great Lakes basin.

The pollutants emitted by the Monroe Power Plant can have significant health and environmental impacts. A growing body of evidence demonstrates that toxic substances may be linked to significant problems for human health and wildlife and are an ongoing threat to the quality of the Great Lakes. Carcinogenicity, endocrine disruption, reproductive and developmental effects are a few of the health effects associated with many of these toxic chemicals.

Clean up and protection of the Great Lakes remains a binational responsibility that requires the cooperation and commitment of all levels of government, in particular the federal governments on both sides of the U.S. - Canada border. While the U.S. - Canada Great Lakes Water Quality Agreement calls for the virtual elimination of persistent toxic substances, states, provinces, municipalities and federal governments have all developed relevant initiatives focused on the protection of the Great Lakes.

The Ontario government has scheduled the elimination of coal-fired power in the province by 2014. However, the continued operation of the Monroe Power Plant will

undermine the environmental benefits of eliminating coal-fired power in the province of Ontario.

Each year in Ontario, transboundary air pollution causes 2,700 premature deaths, puts almost 12,000 people into hospital and causes minor illness symptoms in about 2.7 million others. (Ministry of the Environment (MOE): *Transboundary Air Pollution in Ontario*, June 2005). It is responsible for an estimated \$5.2 billion in damage to Ontario's population, economy and environment. (MOE website: <http://www.ene.gov.on.ca/en/air/tap/index.php#info>).

The cumulative impacts of all the pollution sources in the Great Lakes undermine Great Lakes protection initiatives on both sides of the border. Due to the significant amount of pollution sources within the Lake Erie basin and the health impacts throughout the basin, the emissions from the Monroe Power Plant, the most significant source of air emissions in the Lake Erie and Great Lakes basin, should be considered adverse.

Sincerely,

A handwritten signature in black ink that reads "Derek Coronado". The signature is written in a cursive, flowing style.

Derek Coronado
Coordinator, Citizens Environment Alliance