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AIR MANAGEMENT

To: Robert Eckdale
Wisconsin Department of Natural Resources

From: Mark Reihl
Executive Director

Re: CAMR Comments

Date: June 8, 2007

**Wisconsin State Council
of Carpenters**

United Brotherhood
of Carpenters
and Joiners of America



The Wisconsin State Council of Carpenters would like to express its concerns to proposed revisions to NR 446, Wisconsin Administrative Code, "Control of Mercury Emissions." Pursuant to the proposed rule, Wisconsin will not participate in the USEPA national mercury emission trading program. We believe this places a heavy burden on the Wisconsin rate payer and, negatively impacts the State's future economic development and job growth.

The cap and trade model has proven to be a cost-effective method for sources to attain compliance. Trading of emission reduction credits should be included in this rule to reduce the cost of compliance for rate payers.

The WDNR proposal also prohibits the banking of mercury allowances. Banking provisions are important to encourage early emission reductions. Including banking provisions may facilitate early action, improve regulatory compliance through operating experience, and provide additional compliance options to reduce overall costs to the rate payer.

By not participating in the national trading system or allowing banking, we believe the WDNR's rule will result in higher costs to electric rate payers in Wisconsin and discourage installation of mercury reduction technology prior to the prescribed deadlines. We appreciate the opportunity to comment on the NR 446 revisions.

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