

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

In the Matter of:)
)
AMENDMENTS TO) **R18-20**
35 ILL. ADM. CODE 225.233,) **(Rulemaking – Air)**
MULTI-POLLUTANT STANDARDS (MPS))

NOTICE OF FILING

To: ALL PARTIES ON THE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that I have today electronically filed with the Office of the Clerk of the Illinois Pollution Control Board the attached **PREFILED QUESTIONS FOR BRIAN URBASZEWSKI**, copies of which are herewith served upon you.

/s/ Ryan Granholm
Ryan Granholm

Dated: March 2, 2018

Ryan Granholm
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PREFILED QUESTIONS FOR BRIAN URBASZEWSKI

NOW COME Dynegy Midwest Generation, LLC, Illinois Power Generating Company, Illinois Power Resources Generating, LLC and Electric Energy, Inc. (collectively, “Dynegy”), by their attorneys, Schiff Hardin LLP, and hereby submit prefiled questions for Brian Urbaszewski. Dynegy requests that the Hearing Officer allow follow-up questioning to be asked at hearing based on the answers provided.

1. Have you ever been found to be an expert by any court of law?
2. Do you hold any degrees in epidemiology or toxicology?
 - a. How many college level or graduate level courses have you taken in epidemiology or toxicology? Please identify the course title, the year you took the course, and the school that offered the course.
3. Have you ever conducted any risk assessments associated with human exposure to sulfur or nitrogen compounds in the air?
 - a. If so, please describe the assessments and findings.
4. When setting the National Ambient Air Quality Standards (“NAAQS”), U.S. EPA reviews epidemiological studies, correct?
 - a. And, you reference a number of them in your prefiled testimony, correct?
5. What do you mean by “short term spikes in SO₂,” as used on pgs. 6 & 9 of your pre-filed testimony?
 - a. What is considered “short term” as opposed to “long term”?
 - b. Is it your opinion that “hot spots” are the result of short term spikes in SO₂ emissions?

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- i. If yes, what is the basis for your opinion?
6. When setting the SO₂ NAAQS, U.S. EPA set a limit that is intended to limit short term spikes, correct?
7. Under the current MPS, SO₂ and NO_x emissions are allowed to fluctuate at each plant, so long as the system-wide average annual emission rate is met, right?
 - a. So under the current MPS, annual SO₂ emissions from any single plant could be higher in 2018 than they were in 2016, so long as the system-wide annual emission rate is met in 2018, right?
 - b. Under the current MPS, SO₂ emissions are allowed to fluctuate at each unit on a day-to-day basis, so long as the system-wide annual emission rate is met, right?
 - c. Under the current MPS, SO₂ emissions are allowed to fluctuate at each unit on an hour-to-hour basis, so long as the system-wide annual emission rate is met, right?
8. Have you done any analysis to determine how the MPS units are expected to operate in the future if the MPS proposal is not adopted?
9. Have you done any analysis to determine how the MPS units are expected to operate in the future if the MPS proposal is adopted?
10. In the conclusion of your prefiled testimony (pg. 9) you use the term “hot spots.” What do you mean by that term?
11. Is it your opinion that the current MPS SO₂ annual system-wide emission rate limits prevent SO₂ “hot spots?”
 - a. If so, what is the basis for that conclusion?
 - b. What is the basis for your statement in the conclusion of your prefiled testimony that “[a]n annual cap removes the mechanism that has prevented SO₂ ‘hot spots’ by allowing SO₂ emissions to increase at individual plants if other plants shut down”? (pg. 9.)
 - c. What in the current MPS rule prevents emissions from one plant increasing if another plant in the MPS is shut down?
12. Have you reviewed any information indicating that plants subject to the MPS will shut down if the MPS proposal is adopted?
 - a. If so, please identify the information.
13. Does the analysis included in your prefiled testimony consider actual concentrations of NO_x or SO₂ in Illinois over the last 10 years?

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- a. Did you evaluate whether any actual “short term spikes in SO₂” have occurred in the areas around the plants subject to the MPS at any time over the last 10 years?
14. Do you believe adverse health effects occur at SO₂ levels below 75 ppb?
- a. If yes, please explain the basis for your answer.
 - b. Are you suggesting that the SO₂ NAAQS should be lower than 75 ppb?
 - i. If so, at what level should the SO₂ NAAQS be set and what is the basis for your conclusion?
 - ii. If so, are you suggesting that U.S. EPA has failed to do their job in establishing the proper SO₂ NAAQS?
15. Do you believe adverse health effects occur at SO₂ levels below 50 ppb?
- a. If yes, please explain the basis for your answer.
 - b. At what level of SO₂ do you believe adverse health effects do not occur? Please explain the rationale for your answer.
16. In your prefiled testimony you single out two epidemiologic studies that you believe support your position (pg. 7). Do you know how many epidemiological studies U.S. EPA reviewed when setting the SO₂ NAAQS?

CERTIFICATE OF SERVICE

I, the undersigned, certify that on this 2nd day of March, 2018, I have electronically served the attached **PREFILED QUESTIONS FOR BRIAN URBASZEWSKI**, upon all parties on the attached service list.

My e-mail address is rgranholm@schiffhardin.com;

The number of pages in the e-mail transmission is 6.

The e-mail transmission took place before 5:00 p.m.

/s/ Ryan Granholm

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