



16 January 2018

Mr. Don Brown, Clerk
Illinois Pollution Control Board
James R. Thompson Center
Suite 11-500
100 West Randolph Street
Chicago, Illinois 60601

RE: Public Comment in **Support** of the Illinois Environmental Protection Agency's Filing to Revise the Multi-Pollutant Standards, Docket Number 18-20

Dear Honorable Members of the Illinois Pollution Control Board:

As a member of the Starved Rock Country Alliance, which is a non-profit economic development organization operating near Dynegy's Hennepin plant, I am writing you to share my support for the Illinois EPA's proposed revision to the state Multi-Pollutant Standards (MPS), currently pending before the Illinois Pollution Control Board. The rule represents a win-win for citizens of Illinois, strengthening the state environmental standards and providing operational flexibility for Dynegy, a valuable employer in my area. I ask you to please approve the revision.

There are clear economic and environmental benefits to revising this rule. The proposed rule caps allowable sulfur dioxide (SO₂) and nitrogen oxide (NO_x) emissions from the Dynegy fleet of plants below the limits set by the current MPS agreements. Under the MPS proposal, the IEPA estimates that allowable annual emissions of SO₂ would be 17% lower than under the current rule, while NO_x emissions would be 24% lower. The MPS proposal also imposes a new SO₂ cap on the Joppa facility, a new ozone season NO_x limit on five plants, and new year-round operating requirements relating to certain NO_x controls. Public health is already protected by the short-term National Ambient Air Quality Standards-based emission limits. The MPS rules were created when the plants were owned and operated by separate owners, so it is simply good policy to bring all the plants under a single, consistent rule. This rule revision streamlines regulations and improves the environment, which benefits Illinois residents and businesses.

Dynegy has demonstrated its commitment to Illinois and the environment. Approximately \$2 billion has been invested in the Dynegy fleet for emission control. This allows Dynegy to meet the tighter allowable caps in the MPS proposal and build on the trend of lower emissions from Dynegy's Illinois fleet over the last two decades – an SO₂ reduction of 90%, with significant reductions in NO_x and other emissions.

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IPCB Letter Docket #18-20
16 January 2018

Additionally, Dynegy's Hennepin plant is a significant contributor to the local and State economy. This facility serves as a vital economic engine for my community, the State, and the region. Not only does the plant provide 85 well-paying jobs with a payroll of \$9 million, but Dynegy's employees also spend that money right here in downstate Illinois helping to boost household income for all. The plant further serves as an important source of property tax revenue to help support important public services, including support for our cash-strapped schools, and provides local area economic impacts of \$51.9 million.

I ask the Board to please give careful thought to the environmental benefits of this rule revision and the economic contributions of the covered facilities to the Starved Rock Region's economy.

Sincerely,

A handwritten signature in blue ink that reads "Inga Carus". The signature is written in a cursive style and is contained within a thin black rectangular border.

Inga Carus
Chairman
Carus Group Inc.

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