



January 11, 2018

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

**OFFICERS**

**Michael T. Carrigan**, President  
**Timothy E. Drea**, Secretary Treasurer

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**JAN 17 2018**

STATE OF ILLINOIS  
Pollution Control Board

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:

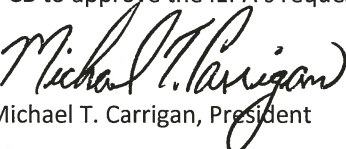
The Illinois AFL-CIO supports the Illinois Environmental Protection Agency's proposed revision to the state Multi-Pollutant Standards (MPS), currently pending before the Illinois Pollution Control Board. The rule represents a win-win for citizens of Illinois, strengthening both the state environmental standards and the economics of a vital downstate Illinois economic resource. We respectfully request your approval of the revision.

There are clear economic and environmental benefits to revising this rule. The proposed rule caps allowable sulfur dioxide (SO<sub>2</sub>) and nitrogen oxide (NO<sub>x</sub>) emissions from the Dynegey fleet of plants below the limits set by the current MPS agreements. Under the MPS proposal, the IEPA estimates that allowable annual emissions of SO<sub>2</sub> would be 17% lower than under the current rule, while NO<sub>x</sub> emissions would be 24% lower. 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, which benefits Illinois businesses and residents.

Dynegey has demonstrated its commitment to Illinois and the environment. Approximately \$2 billion has been invested in the Dynegey fleet for emission control. This allows Dynegey to meet the tighter allowable caps in the MPS proposal and build on the trend of lower emissions from Dynegey's Illinois fleet over the last two decades – an SO<sub>2</sub> reduction of 90%, with significant reductions in NO<sub>x</sub> and other emissions.

Another consideration relates to local jobs and the support of central and southern Illinois communities. Dynegey's downstate facilities employ over 700 highly skilled, well-paid union members and provide hundreds of part-time building trades' jobs for plant maintenance and upgrades. Dynegey supports over 8,000 direct and indirect jobs in Illinois and generates over \$2 billion in benefits to the Illinois economy, directly impacting 80 of the state's 102 counties. The company also pays millions of dollars in property tax payments, supporting local schools and emergency services.

For the sake of individuals, families, communities and businesses across central and southern Illinois, I urge the IPCB to approve the IEPA's request to revise Illinois' Multi-Pollutant Standard.

  
Michael T. Carrigan, President