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STATE OF ILLINOIS Pollution Control Board

P.C. #1853

January 10, 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 State Representative for the 116th District, which is located near the Baldwin Power Plant. I am writing in regard to 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 both the state environmental standards and the economics of a vital downstate Illinois economic resource. I ask you to consider the revision.

There are clear economic and environmental benefits to revising this rule. The proposed rule caps allowable sulfur dioxide (SO2) and nitrogen oxide (NOx) 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 NOx emissions would be 24% lower. The MPS proposal also imposes a new SO2 cap on the Joppa facility, a new ozone season NOx limit on five plants, and new year-round operating requirements relating to certain NOx controls. Public health is protected by short-term (i.e., 1-hour, 3-hour, and 24-hour) 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

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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 NOx and other emissions.

Additionally, Baldwin is a significant contributor to the local and State economy. This facility serves as a vital economic engine for my district. Not only does the Baldwin plant provide 204 well-paying jobs with a payroll of \$24 million in our region, 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 \$402.0 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 downstate economy.

Sincerely,

Jerry F. Costello, II

State Representative

Luny J. Contille #

116th District

JFC/ph