Electronic Filing: Received, Clerk's Office 1/24/2018 PC#1855

From: cjohnsonconsulting
To: Brown, Don

Subject: [External] Comment on IEPA Rule Affecting Dynegy
Date: Wednesday, January 24, 2018 12:08:40 PM

Dear Mr. Brown,

As the Chair of the Conservation Committee for the Woods & Wetlands Group of the Illinois Sierra Club, located in northeastern Illinois, I am writing on behalf of the Sierra Club's 2,500 members located in Lake and northern Cook counties. We vigorously oppose changes by the Illinois Environmental Protection Agency that would allow Dynegy to double the amount of air pollution that the company's aging coal-powered plants spew into the air.

If the IEPA revises air pollution regulations, Dynegy will be able to keep older and dirtier coal-powered plants open and to run them more, reducing the use of newer, cleaner, more efficient coal-fired power plants. The new pollution regulations would establish a limit of 55,000 tons per year of sulfur dioxide from Dynegy's eight coal plants in the state. The limit would be 22,000 tons per year of nitrogen oxides. These new caps would be significantly higher than the emissions last year from the Dynegy plants. The emissions of nitrogen oxides would rise by 79 percent.

Moreover, these changes would permit Dynegy to continue operating old coal plants without adding scrubbers. For sulfur dioxide, the old plants emit 0.43 lbs/mmBtu, compared to the plants with scrubbers, which emit 0.05 lbs/mmBtu. Because the older plants would be cheaper to operate, Dynegy would run them more often, creating hot spots of deadly pollution in central and southern Illinois. For example, the Edwards Power Station, one of the old plants, spews deadly pollution into the entire Peoria area. The pollution exacerbates asthma and other diseases. As a result, Peoria is rated the second worst metropolitan area for the health of African Americans in the country because of the pollution caused by the Edwards Station.

According to the Illinois Department of Public Health, 19 percent of African-American children suffer from asthma, compared to 6 percent of white children. Air pollution either causes or exacerbates asthma. To improve the health of children, and of all citizens of Illinois, the IEPA should be taking steps to make the air cleaner, not make it worse.

Loosening the air pollution rule for Dynegy will also contribute significantly to climate change. According to the *Chicago Tribune* on September 27, 2017, the coal-powered plants that Dynegy operates in Illinois emitted 32 million tons of greenhouse gases in 2016. That's equal to the emissions from 6 million vehicles.

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It is the responsibility of the IEPA to improve the environment and help ensure the health of all people in Illinois. Changing pollution rules to allow Dynegy to continue operating its old, dirty power plants is a complete miscarriage of the mission of the IEPA. You must reject the proposals to loosen the air pollution rules governing the operation of coal-powered plants in Illinois.

Yours truly,

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