



**Chemical Industry
Council of Illinois**

January 29, 2018

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

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CLERK'S OFFICE
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Pollution Control Board
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RE: CICI's Comments Supporting of the IEPA's Filing to Revise the Multi-Pollutant Standards (MPS), Docket Number 18-20

On behalf of the Chemical Industrial Council of Illinois (CICI), I urge the Board to approve IEPA's proposal to revise the existing Multi Pollutant Standard (MPS) rule for Dynegy's eight power plants in Southern Illinois.

Even though Dynegy now owns and operates all eight plants, the current MPS rule does not recognize Dynegy as the common owner. This restricts the company's ability to optimize operations across all eight plants, which is essential in this economically challenging environment.

Approximately \$2 billion has been invested in the Dynegy fleet for emission control. This allows Dynegy to meet the tighter allowable annual caps in the MPS proposal and build on the trend of lower emissions from Dynegy's Illinois fleet over the last two decades – a sulfur dioxide (SO2) reduction of 90%, with significant reductions in nitrogen oxide (NOx) and other emissions.

Further, the USEPA and the IEPA evaluate the ability of air pollution control rules to protect public health and the environment based on allowable emissions. 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.

The proposed rule also has a more streamlined framework that provides consistency with federally based limits and the host of other limits imposed on Dynegy's Illinois fleet. The proposed rule also does not eliminate any future emission reductions, new equipment requirements or any health-based emission limits that apply to these plants.

If approved, the proposal will help ensure that reliable, base-load generation is available to meet changing demand. It will also strengthen the economic vitality of this important state resource and provide more regulatory clarity for both the public and Dynegy's Illinois fleet.

The chemical industry in Illinois is the 2nd largest manufacturing sector in the state thanks in large part to reliable, competitively priced energy in today's market. Illinois is also the 4th

largest chemical producing state in the nation. The industry directly employs over 46,000 Illinoisans at an average wage of \$114,083 a year. In addition, the business of chemistry supports 184,900 Illinois jobs. In all, the business of chemistry in Illinois generated \$39.1 billion worth of products, and exported \$8.1 billion, making the industry Illinois largest exporter.

Thank you for your time and consideration. If you or your staff has any questions or comments, do not hesitate to contact me in the Springfield office.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark A. Biel". The signature is fluid and cursive, with a large initial "M" and a distinct "Biel" at the end.

Mark Biel
Chief Executive Officer