

Electronic Filing: Received, Clerk's Office 6/15/2018 P.C. #2896

From: [Tipsord, Marie](#)
To: [Brown, Don](#)
Subject: FW: [External] Re: R2018-20, Amendments to 35 Ill. Adm. Code 225.233
Date: Friday, June 15, 2018 11:51:03 AM

Just in case

From: Okorafor, Ngozi
Sent: Friday, June 15, 2018 11:48 AM
To: Abe Scarr <abe@illinoispirg.org>
Cc: Tipsord, Marie <Marie.Tipsord@illinois.gov>; Lucci, Michael <Michael.Lucci@illinois.gov>
Subject: Re: [External] Re: R2018-20, Amendments to 35 Ill. Adm. Code 225.233

Thank you~

Ngozi C. Okorafor, Esq.

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Sent from my iPhone

On Jun 15, 2018, at 11:41 AM, Abe Scarr <abe@illinoispirg.org> wrote:



Friday, June 15th, 2018

Illinois Pollution Control Board

100 W Randolph St. #11
Chicago, IL 60601

Re: R2018-20, Amendments to 35 Ill. Adm. Code 225.233

Thank you for the opportunity to provide comment on the Illinois Environmental Protection Agency's proposal to amend the Multi Pollutant Standard (MPS). We urge the Illinois Pollution Control Board to reject the proposal.

The amendment would provide Dynegy the option to increase air pollution at certain coal plants in Illinois, shifting generation from less polluting to more polluting plants. As reported in the Chicago Tribune, the new limit on sulfur dioxide emissions "would be nearly double what Dynegy's existing fleet emitted last year and higher than every year since 2012" and the new limit on nitrogen oxide emissions "would be 79 percent higher than what came out of the smokestacks in 2016."

This pollution causes a host of respiratory consequences, ranging from coughing, wheezing and throat irritation, to asthma, increased risk of infection, and permanent damage to lung tissue.

Last year we released a report, [Our Health at Risk: Why Are Millions of Americans Still Breathing Unhealthy Air?](#), which reviewed EPA records of air pollution levels across the country. Key findings included:

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- People
- in the Chicago metropolitan area experienced 70 days with elevated smog pollution and 151 days with elevated soot pollution in 2015.
-
-
- People
- in St. Louis metropolitan area experienced 69 days with elevated smog pollution and 202 days with elevated soot pollution in 2015.
-

-
- St.
- Louis is ranked 6th and Chicago ranked 29th in the nation for worst smog pollution in 2015.
-
-
- Across
- Illinois, four metro areas had unhealthy levels of air pollution on at least 70 of days during 2015, including Chicago, St. Louis, Quad Cities and Champaign-Urbana.
-

The IEPA's stated goal of keeping financially struggling coal plants open by providing them operational flexibility does not merit increased threat to public health. We are long past any need to trade our health and safety in exchange for economic prosperity. Clean energy sources produce zero pollution and increasingly outperform fossil fuel generation in the competitive market.

The stated goal is even more questionable given the merger of Texas-based companies Dynegy and Vistra Energy, an agreement valued at \$20 billion.

For these reasons we urge the IPCB to reject this proposal. Again thank you for the opportunity to provide comment.

Sincerely,

Abraham Scarr
Illinois PIRG Education Fund

cc:

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