



Friday, June 15, 2018

Illinois Pollution Control Board  
100 W Randolph St. #11  
Chicago, IL 60601

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

Please accept these comments on behalf of Steelworkers Organization of Active Retirees. Our organization is concerned with the Illinois Environmental Protection Agency's proposal to amend the Multi Pollutant Standard (MPS) that will provide Dynegy the option to increase air pollution at certain coal plants in Illinois, avoid installing modern, life-saving pollution controls at its dirtiest plants and incentivizes the shuttering of Dynegy's least polluting plants. As [reported in the Chicago Tribune](#), "Under the new rules, Dynegy could emit nearly double the amount of harmful sulfur dioxide they emitted last year."

On several occasions already, Dynegy has been granted delays and changes to the MPS by the Pollution Control Board and our organization asks that the Board deny this latest proposal and maintain the original structure and intent of one of Illinois' most important clean air standards.

We are also concerned with the manner in which this rule was proposed and the new financial circumstances of Dynegy following its merger with Vistra Energy. As also reported in the Chicago Tribune, the IEPA proposed this rule after nine months of backroom discussions with corporate executives from Dynegy without any formal comment period for the public. Additionally, the merger of Texas-based companies Dynegy and Vistra Energy, an agreement valued at \$20 billion, should put an immediate halt to this proposal given that the alleged basis for the rule was Dynegy's economic need for "operational flexibility." In 2018, profitable companies who knowingly purchase aging, polluting energy assets in Illinois such as Dynegy and Vistra Energy, should comply with existing Illinois law and responsibly install modern pollution controls or invest in cleaner, more competitive sources of generation.

Our organization urges the IPCB to reject Illinois EPA and Dynegey's proposal that will fail to protect Illinois jobs and put our residents at greater risk of air pollution exposure.

Sincerely,

Oliver J. Rains Jr., Granite City, IL  
S.O.A.R Steelworkers Org. of Active Retirees  
SOAR Chapter 7-34-2

cc:

Office of Governor Bruce Rauner  
ngozi.okorafor@illinois.gov  
michael.lucci@illinois.gov