




**SIERRA
CLUB**

Heart of Illinois Group  PO Box 3593, Peoria, IL 61612

June 14, 2018

Public Comment: Case R18-20, Amendments to 35 Ill. Adm. Code 225.233

Dynegy Multi Pollutant Standard / MPS regulations changes as proposed
by the Illinois Environmental Protection Agency

To the Illinois Pollution Control Board:

On behalf of the Heart of Illinois Group Sierra Club, which has now approximately 1,200 members in fifteen counties in Central Illinois, including Peoria (Edwards Power Station), Fulton (Duck Creek Power Station), Hennepin (Hennepin Power Station) and Mason (Havana Power Station) and counties surrounding and impacted by air pollution from these power stations, we urgently ask that you Deny the proposed regulations change R 18-20. Our members and their families will clearly suffer increased air pollution for years to come if this Rule is approved. It is clear that this Rule will allow the dirtiest coal-fired plants in the Dynegy/now Vistra fleet to operate at greatly increased amounts. The public should not be inflicted with a dial-back of area air quality merely for the wishes of the company that proposed and wrote these regulations changes for the Illinois Environmental Protection Agency (IEPA) and worked exclusively with IEPA over nine months of 'closed-door' corporate and agency collusion.

Thank you for holding public hearings in Peoria, Edwardsville, and Springfield regarding Case R18-20. We appreciate the time and attention the IPCB has given to this case and the varied opportunities for public comment. We urge you to carefully consider that reducing air pollution protections for locations with the dirtiest operating coal-fired power plants is not a good idea or in keeping with the interests of a healthy environment for the citizens of Illinois.

Increased operations of the Edwards Power Station will mean the Peoria metro area will particularly be hard hit as this plant has been operated without adequate pollution control upgrades for decades. We strongly urge the current MPS be kept in place to protect the Peoria area and other locations which have the dirtiest operating plants. The current MPS Rule is the remaining guardian for locations like Peoria, as time and time again, owners of the Edwards coal plant and other coal plants have been awarded variances and delay after delay in upgrading certain plants.

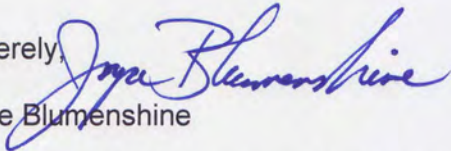
Clearly, there is no guarantee that approving the proposed Rule will insure that any of the Dynegy/now Vistra power stations will remain operating. There are no guarantees to any local communities that plants will continue operating even if this Rule change is approved. It is clear from newspaper articles regarding Dynegy/now Vistra actions in Randolph County, that local property tax decreases are being demanded by the company. Vistra has a publicized value of \$20 billion which should mean the company can upgrade any of the plants needing such work

and that the company does not need any relaxation of regulations to afford to upgrade plants if they so choose to run dirty plants more. This Rule is a blatant attempt to allow the Dynegy/now Vistra fleet to operate in an unbalanced and improvident manner, with no regard to the creation of local area 'hot spots' from the increased pollution which will be directly caused by increased operations of the dirtiest plants.

Approval of this Rule will allow air pollution to double in locations where the dirtiest coal plants are located and that should be grounds for Denial of R 18-20 along with the clear fact that the economic exigency claimed by Dynegy is groundless, based on the fact they are owned by the very economically viable company Vistra.

We ask that IPCB deny the IEPA/Dynegy proposal. It is essential that the original structure and intent of the MPS be maintained as it is one of our state's most important clean air standards.

Sincerely,


Joyce Blumenshine

Heart of Illinois Group Sierra Club Conservation Co-Chair

2419 E. Reservoir, Peoria, IL 61614

cc: Office of Governor Bruce Rauner

ngozi.okorafor@illinois.gov

michael.lucci@illinois.gov