

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

Peoria Families Against Toxic Waste asks that the Illinois Pollution Control Board reject Dyengy's request to amend the Multi-Pollutant Standard. Our group formed to fight the expansion of the Peoria Disposal Company Hazardous Waste Landfill in Peoria County. Over the years we have appeared before you to ask that you deny several requests for modified permits and to delist several hazardous waste streams. In the course of that work, we became familiar with the Toxic Release Inventory for our county. For many years, the hazardous waste landfill sat in position #1 and the Edwards plant in position #2 for Peoria County. With the closure of the hazardous waste landfill, it has fallen off the chart, leaving the Edwards plant as our top polluter.

Being concerned about pollution in all its forms, our members have testified before you at several variance proceedings. We have closely tracked the designation of two townships in southeastern Peoria county as non-attainment for SO₂. We have followed the lawsuit and read Judge McDade's ruling finding Dynegey guilty of 1000s of opacity violations. We continue to wonder how a 1960s era coal plant can sit adjacent to a large metro population center and operate without any modern pollution controls.

We believe the proposal before you not only perpetuates this outrage, it actually makes things worse. Given the economics of coal plants in today's energy market, we realize that Dynegey will do everything possible to scrape profit from its dilapidated downstate fleet, suffering from years of chronic underinvestment. Looking at the specifics of what they are asking for, it seems clear that they are building a framework where they no longer need to run plants like Duck Creek and Coffeen with cost-adding SO₂ pollution controls and can instead meet power demands using its oldest, dirtiest plants which do not have the added cost of scrubbing out SO₂ pollution. We see this as an environmental justice issue for Central Illinois and a climate justice issue for people everywhere. We urge the board to reject this proposal.

Sincerely,

Lisa Offutt and Tracy Meints Fox
Peoria Families Against Toxic Waste