

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

Please accept these comments on behalf of the Global Warming Solutions Group of Central Illinois. Our organization formed over a decade ago to focus on local solutions to Global Warming. We have advocated for city-wide recycling in Peoria and the residential aggregation program for community-wide electrical purchasing and most recently hosted three informational programs on solar energy and energy efficiency. Although our traditional focus is on individual actions, we recognize that no action would do more to reduce Central Illinois' carbon footprint than to eliminate CO2 emissions from the Edwards plant in Bartonville.

We have followed the proposal to replace the current rate-based Multi-Pollutant Standard with one that includes flat caps for SO2 and NOx. We were especially concerned when we read in the Chicago Tribune that "Under the new rules, Dynegy could emit nearly double the amount of harmful sulfur dioxide they emitted last year." We believe a more balanced proposal would (1) establish health-protective limits for plants near urban centers like Peoria (2) require that scrubbers and other existing pollution control equipment remain in place and in operation at all plants until retirement, (3) incentivize running of plants like Coffeen which have more up-to-date pollution controls and (4) reduce the flat caps every time a plant retires or is taken off-line indefinitely.

However, even with the suggested improvements, we question whether this proposal should be in front of the board at all. Ameren, and then Dynegy, have already been granted several variances which have allowed it to put off installing promised pollution controls. Now Dyengy comes before the board, pleading for relief from its pollution control obligations because of its financial hardship and need for "operational flexibility." The board should note that (1) Dynegy acquired the plants for no money down, instead assuming Ameren's \$800M in debt and (2) Vistra has acquired Dynegy and in the process boosted its stock prices and brought its considerable assets to the table. The citizens of Central Illinois should not continue to suffer the health effects of dirty air so Dynegy's new Vistra masters can wring even more dollars out of aging plants like Edwards. The burden should be on Dynegy to demonstrate why this change is necessary and they have completely failed to do so.

Dynegy's failure to build a compelling case for turning the Multi-Pollutant Standard upside down is symptomatic of the way this proposal was conceived. The Tribune reported that IEPA met with Dynegy for nine months before informing the public about its plans. Environmental leaders were ambushed with a fully negotiated proposal and only a few weeks to comment. Little of IEPA's rationale or analysis was shared – suggesting to us that perhaps there was none. We beg the board to seriously consider whether these backroom revisions represent the kind of regulatory process that protects Illinois air and water.

Our organization urges the IPCB to reject Illinois EPA and Dynegy's proposal that will put Central Illinois residents at greater risk of air pollution exposure.

Sincerely,

Tracy Meints Fox and Kiersten Sheets  
Global Warming Solutions Group of Central Illinois