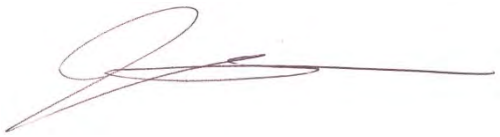
BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

In the Matter of:	)	
	)	R2018–20
AMENDMENTS TO	)	(Rulemaking – Air)
35 ILL. ADM. CODE 225.233,	)	
MULTI-POLLUTANT STANDARDS (MPS)	)	

NOTICE OF FILING

PLEASE TAKE NOTICE that I have filed today with the Illinois Pollution Control Board the attached **POST-HEARING COMMENTS OF ENVIRONMENTAL GROUPS**, copies of which are served on you along with this notice.

Respectfully Submitted,



Justin Vickers
Environmental Law & Policy Center
35 E. Wacker Dr., Suite 1600
Chicago, IL 60601
(312) 795-3736
jvickers@elpc.org

Dated: March 15, 2019

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ENVIRONMENTAL GROUPS' POST-HEARING COMMENTS

1. Introduction

Environmental Defense Fund, Environmental Law & Policy Center, Respiratory Health Association, and Sierra Club ("Environmental Groups") respectfully submit these post-hearing comments in the above-captioned rulemaking. The Environmental Groups request that the Illinois Pollution Control Board ("PCB" or "Board") decline to amend 35 Ill. Adm. Code 225.233, Multi-Pollutant Standards ("MPS").

Parties have asserted that the proposed amendments to the MPS benefit the Illinois environment because, despite being higher than actual recent historical emissions, they will lower the allowable emissions of NO_X and SO_2 from the electric generating units ("EGUs") comprising the MPS Group.[1] As explained in previous post-hearing comments, the Board's Second First Notice regarding the proposed MPS amendment allows emissions to increase and poses the risk of disproportionately impacting burdened communities.

2. IEPA's forthcoming proposal

We understand that Illinois Environmental Protection Agency's ("IEPA") post-hearing comments will include a proposal based on an agreement that IEPA has reached with Vistra. That proposal has only been shared orally with the Environmental Groups and we neither endorse nor oppose that proposal. The Environmental Groups take this position simply because

[1] *See* Post-Hearing Comments of Ill. Envt. Prot. Agency at 22, *In re Amendments to 35 Ill. Adm. Code 225.233, Multi-Pollutant Standards,* R18-20 (June 1, 2018).

there was not enough time nor enough opportunities for a full and adequate dialogue about this proposal. Our groups met with representatives of Vistra just one time to discuss this proposal and, in our view, the conversation has just started. Additionally, we understand that Vistra, outside of this venue, may be proposing some legislation regarding its fleet of coal plants in Illinois. We do not want to silo conversations on what is being negotiated under the MPS and how it affects Vistra's coal fleet from conversations about related legislation that Vistra might propose regarding its coal fleet. We hope to continue the dialogue we just started with Vistra in other venues. Therefore, we neither support nor reject IEPA's proposal. These comments speak only to the existing proposed rule and the information presented in this proceeding.

3. Rate-Based MPS

The Board's proposed SO_2 and NO_X caps are substantially higher than the MPS units' actual emissions in 2017.[2] As a result, there would not be any emissions reductions in relation to the MPS fleet's real-world operations.[3] If the Board determines that some relief to Dynegy/Vistra is warranted – though we still believe that no relief is necessary – changes should be limited to allowing Dynegy/Vistra to combine its two MPS groups under one rate-based standard of 0.23 lbs/mmBtu for SO_2 and a second rate-based standard of 0.11 lbs/mmBt for NO_X, which are the current standards for half of Dynegy/Vistra's Illinois fleet.[4] These amendments would: (1) remedy Dynegy/Vistra's concern with the existing rule that its fleet of plants are divided into two separate MPS groups that have become too small for meaningful averaging; and (2) provide Dynegy/Vistra with relief by allowing it to use the more lenient of the MPS limits imposed on the two separate MPS groups. The Attorney General's office also advocated for "limiting the

[2] *See* Ex. 37, Pre-Filed Testimony of Andrew Armstrong on Behalf of the Illinois Attorney General's Office at 10, *In re* Amendments to 35 Ill. Adm. Code 225.233, Multi-Pollutant Standards, R18-20 (Apr. 3, 2018).
[3] *Id.*
[4] *See* 35 Ill. Adm. Code 225.233(e)(3).

changes to combining the MPS groups while maintaining a rate-based [limit]. This is a more modest incremental change to the MPS that would provide additional options to Dynegy through larger pool of plants from which to choose its compliance approach."[5] The Board should, however, reject the conversion of the MPS limits to mass-based caps for the combined MPS groups

4. Health and Environmental Equity

The dangers posed to human health by SO_2 pollution are especially troubling in the Peoria area, which has historically faced particularly high concentrations of SO_2 and other pollutants. Peoria and the surrounding towns are home to numerous major industrial facilities, and pollution from these facilities has had cumulative and adverse effects on the local residents. Both short- and long-term exposure to both NO_X and SO_2 can have serious health effects. These pollutants have been linked to respiratory issues such as asthma, Chronic Obstructive Pulmonary Disease, coughing, wheezing, and difficulty breathing.[6] There is even a positive association between NO_X and/or SO_2 and cardiovascular problems, reproductive and developmental complications, an increase in the incidence of cancer, and an overall increase in mortality in the general population.[7] As Mr. Urbaszewski noted in his testimony, "[H]igher localized SO_2 emissions (especially if they occur in short term spikes) pose a health threat, especially to sensitive

[5] Jan. 17, 2018 R18-20 Tr. 174:6-12.
[6] Integrated Science Assessment for Oxides of Nitrogen—Health Criteria, ENVIRONMENTAL PROTECTION AGENCY at 1-16 to 1-20 at 1-16 to 1-20 (Jan. 2016), available at http://ofmpub.epa.gov/eims/eimscomm.getfile?p_download_id=526855; Integrated Science Assessment for Sulfur Oxides—Health Criteria, ENVIRONMENTAL PROTECTION AGENCY, at 3-5 (Sept. 2008), available at http://ofmpub.epa.gov/eims/eimscomm.getfile?p_download_id=491274.
[7] Integrated Science Assessment for Oxides of Nitrogen— Health Criteria, ENVIRONMENTAL PROTECTION AGENCY at 1-16 to 1-20 at lxxix; 1-22 to 1-36; Integrated Science Assessment for Sulfur Oxides—Health Criteria, ENVIRONMENTAL PROTECTION AGENCY, at 3-34 to 3-42, 3-60 to 3-63.

subgroups and even if they do not exceed the NAAQS."[8] Our concern with changing the MPS from a rate-based limit to a mass-based limit is that it frees Vistra up to retire plants such as Duck Creek and Coffeen that have flue gas desulfurization controls while continuing to run plants without any SO_2 controls.

We also understand that the proposal that will be a part of IEPA's comments indicates that Vistra intends to retire 2000 MW of coal fired power plants in Illinois. This rulemaking and that proposal do not contain any commitment or requirement to retire the plants with the highest SO_2 emissions, such as E.D. Edwards, first or even in conjunction with plants with the lowest SO_2 emissions. The Environmental Groups' primary concern with both the Board's proposed rule and the proposal expected in IEPA's comments is that they allow the plants with the highest SO_2 emissions,, such as E.D. Edwards, to continue to operate in a dense community already burdened by air pollution after the plants with the lowest SO_2 emissions are retired. This is inconsistent with the purpose of the Illinois Environmental Protection Act.[9].

5. Environmental Groups' Recommended Cap

Any mass-based caps for the combined MPS group should be set lower than those currently proposed by PCB. As stated in previous sets of comments, if the Board is going to shift from a rate-based MPS to a mass-based MPS, the Environmental Groups endorse the annual caps calculated by the Attorney General's Office of 34,094 tons for SO_2 and 18,920 tons for NO_X.[10] Caps at those levels would ensure that emissions from the Dynegy/Vistra Illinois fleet do not

[8] Ex. 34, Prefiled Testimony of Brian Urbaszewski at 6, *In re Amendments to 35 Ill. Adm. Code 225.233, Multi-Pollutant Standards*, R18-20 (February 6, 2018)*; see also* Post-Hearing Comments of Environmental Groups at Ex. A, *In re Amendments to 35 Ill. Adm. Code 225.233, Multi-Pollutant Standards*, R18-20 (June 1, 2018).
[9] 415 ILCS 5/8 (It is the purpose of this title to restore, maintain, and enhance the purity of the air of this State in order to protect health, welfare, property, and the quality of life and to assure that no air contaminants are discharged into the atmosphere without being given the degree of treatment or control necessary to prevent pollution.")
[10] Post-Hearing Comments of Environmental Groups at 2, *In re Amendments to 35 Ill. Adm. Code 225.233, Multi-Pollutant Standards*, R18-20 (June 1, 2018).

exceed the levels allowed by the current MPS and would, therefore, preserve much of the environmental benefit provided by the current MPS.

The Environmental Groups are supportive of the PCB's proposal to include a provision that would proportionally reduce these caps when a unit retires. We also support IEPA's December 20, 2018 proposal making it clear that emissions from shutdown units must be taken into account during the compliance period in which the shutdown took place.[11] This ensures that plants continue to use existing SO_2 and NO_x controls on a plant-by-plant basis, maintain good pollution control practices, and prevent significant emissions increases on a pounds-per-million-Btu basis (rate basis). In terms of allocation amounts, the mothballing or retiring plant should be allocated the same amount as it would be upon transfer to a new operator with an overall cap of SO_2 of 34,094 tons and overall NO_x cap of 18,920 tons. The Environmental Groups agree with the transfer amounts provided by the IEPA under overall caps of 34,094 tons of SO_2 and 18,920 tons of NO_x.[12] We have concerns, however, about how the proposed rulemaking treats mothballed units that operate for part of a compliance period.

6. Temporary Shutdown (Mothballing)

Under Section 225.233(h)(1) of the Board's proposed rule, mothballed[13] units do not trigger a reduction in emission limits unless the unit is mothballed for an entire compliance period. This is in contrast to transferred or retired units, where the cap gets reduced immediately upon transfer or permanent shutdown. This difference in treatment for mothballed units creates the possibility for the MPS owner to increase emissions at some units when a unit is first mothballed. For

[11] P.C. #2931, Illinois Environmental Protection Agency's Additional Suggested Amendment to Section 225.233, *In re Amendments to 35 Ill. Adm. Code 225.233, Multi-Pollutant Standards,* R18-20 (December 20, 2018).
[12] *See* Post-Hearing Comments of Ill. Envt. Prot. Agency at Attach. 4, *In re Amendments to 35 Ill. Adm. Code 225.233, Multi-Pollutant Standards,* R18-20 (June 1, 2018).
[13] For the purposes of these comments, "suspension", "temporary shutdown", and "mothballing" will be used interchangeably.

example, if the MPS owner chose to mothball a unit during the first quarter of a compliance period, other units would be able to emit more for the remainder of the compliance period. As Mr. Armstrong explained in his December 10, 2018 pre-filed testimony, "Under this scenario, the MPS owner effectively is permitted to use emissions allocated to mothballed units to increase emissions of remaining units – unlike the case of either transferred or retired units. The earlier in the year the mothballing occurred, the more disparate the treatment."[14] This would have significant negative impacts to the communities surrounding any units that increased emissions in this scenario. This possibility alone is cause for a revision to the proposed rule that would treat the mothballing of units the same as a transfer or permanent shutdown.

The problem becomes worse when considering the possibility that under the generating unit suspension rules at the Midcontinent Independent System Operator ("MISO"), generating units can be in suspension for up to thirty-six months in any five year period.[15] Therefore, the MPS owner could mothball a unit at the start of a compliance period, operate the unit briefly at the end of the compliance period, and then mothball the unit again at the start of the following compliance period. Under MISO's rules, as long as the MPS owner suspends the unit for no more than thirty-six months over a five-year period, it could mostly cease operations of the MPS unit while avoiding a reduction in the emissions cap. Further complicating the matter, MISO's tariff no longer differentiates requests to suspend and requests to retire. Recent changes in Section 38.2.7 of the MISO tariff relieve generation owners from specifying for how long they intend to cease operation of a generating unit, leaving open the possibility that the unit will return to operation at some indefinite time in the future.

[14] Ex. 48, Pre-filed Testimony of Andrew Armstrong at 8, *In re Amendments to 35 Ill. Adm. Code 225.233, Multi-Pollutant Standards*, R18-20 (December 10, 2018).
[15] MISO, FERC Electric Tariff, Module C, § 38.2.7 (Generation Suspension, Generation Retirement, and System Support Resources) (53.0.0).

As Mr. Armstrong noted in his December 10, 2018 testimony, there is some ambiguity in what constitutes a "temporary shutdown."[16] The Environmental Groups agree that, for example, temporary shutdowns for maintenance that do not exceed two months should not be subject to the provisions of (h)(1). Pursuant to MISO tariff Section 1.S, a generating unit is considered suspended and thus required to file an Attachment Y Notice pursuant to Section 38.2.7 of the MISO tariff if the resource will cease operations for more than two months.[17] Accordingly, we endorse Mr. Armstrong's proposal that only temporary shutdowns that require a MISO Attachment Y suspension request would rise to the level of triggering a reduction in the annual cap. This could be codified in the rules with the following changes to section (h)(1), which mirror those provided in Mr. Armstrong's December 10, 2018 testimony[18]:

> (1) If one or more EGUs in an MPS Group are temporarily shut down **in accordance with the owner's notice to a Regional Transmission Organization that service will be suspended for more than two months** ~~over an entire compliance period or periods~~:
>
> > **(A) For any compliance period or periods during which such temporary shutdown occurs or continues, a temporarily shut down EGU is not part of an MPS Group, but the owner or operator of a temporarily shut down EGU must not cause or allow to be discharged into the atmosphere emissions from the EGU in excess of the allocation amounts attributable to the temporarily shut down EGU set forth in Columns A, B, and C in subsection (h)(2).**
> >
> > (~~A~~**B**) The combined emissions limitations for the MPS Group set forth in this Section, as applicable must be adjusted by subtracting from those limitations the applicable allocation amounts set forth in Columns A, B, and C in subsection (h)(2) that are attributable to the temporary shutdown EGU or EGUs.
> >
> > (~~B~~**C**) The owner and operator of the MPS Group must comply with the adjusted emissions limitations, beginning with the compliance period or periods during which the temporary shutdown occurs. An adjusted emissions limitation will no longer apply, if the EGU or EGUs resume **service for an entire compliance**

[16] Ex. 48, Pre-filed Testimony of Andrew Armstrong at 9, *In re Amendments to 35 Ill. Adm. Code 225.233, Multi-Pollutant Standards*, R18-20 (December 10, 2018).
[17] MISO, FERC Electric Tariff, Module A, § 1.S (Definitions) (33.0.0).
[18] Ex. 48, Pre-filed Testimony of Andrew Armstrong at 9-10, *In re Amendments to 35 Ill. Adm. Code 225.233, Multi-Pollutant Standards*, R18-20 (December 10, 2018).

period associated with that limitation.

(~~C~~**D**) Nothing in this subsection (h) shall be construed to relieve owners and operators of EGUs in an MPS Group from any of the other requirements set forth in this Section, including the mercury standards under subsection (d).

We believe that the treatment of temporary shutdowns in the proposed rule is inconsistent with the purposes of the MPS and the Board's own intention in setting caps to "limit and prevent potential sizeable shifts in generation and emissions from controlled to uncontrolled plants."[19] Therefore, the Board should modify the proposed rule to avoid the potential for increasing emissions at MPS units when another MPS unit has been mothballed for more than two months but less than a full compliance period.

7. A Lower Cap Is Needed

Lower caps are needed because the caps set by the Board do not meet the Board's stated objectives for its Second First Notice proposed rule. The Board set the caps at the levels selected with the goal of preventing shifts in generation from controlled to uncontrolled plants. As the Board explained in its October 4, 2018 Order, "[A]nnual mass caps at [the revised proposed] levels would limit and prevent potential sizeable shifts in generation and emissions from controlled to uncontrolled plants."[20] James Gignac's testimony provided a hypothetical in which other MPS units made up the lost generation from Coffeen and Duck Creek, assuming the retirement of those two plants.[21] Mr. Gignac's testimony provided one "example of one of many scenarios under which generation from controlled units, upon their mothballing or retirement, could be shifted to uncontrolled or less-controlled units thereby leading to an emission increase

[19] Opinion and Order of the Board, Proposed Rule, Second First Notice ("Order") at 53, *In re Amendments to 35 Ill. Adm. Code 225.233, Multi-Pollutant Standards*, R18-20 (October 4, 2018).
[20] *Id*. at 53.
[21] Ex. 50, Pre-filed Testimony of James Gignac at 5:7-18, *In re Amendments to 35 Ill. Adm. Code 225.233, Multi-Pollutant Standards*, R18-20 (Dec. 10, 2018).

from the MPS fleet under the Board's Second First Notice Proposal."[22] Mr. Gignac demonstrated that under the Board's cap, scrubbed plants such as Coffeen and Duck Creek could retire and other unscrubbed plants could increase generation to make up for lost generation from those two plants with a comparable increase in emissions.[23] In this scenario, the total SO_2 emissions from the fleet were 42,666 tons and the NO_X emissions were 15,801 tons.[24] "The SO_2 allocation for both Coffeen and Duck Creek is 200 tons per year. Thus, a retirement of Coffeen and Duck Creek would result in a new SO_2 cap of 44,520 tons (44,920 minus 400)."[25] This complies with the Board's proposed cap because the SO_2 emissions from the fleet of 42,666 tons is less than the adjusted cap of 44,520. Further, these increases would "not cause violations of National Ambient Air Quality Standards ("NAAQS") because the level of emissions for each plant in this scenario is below the level assumed by Illinois EPA for purposes of its revised proposed fleetwide cap (*see*, e.g., Ex. 29 at 2) and/or below the level analyzed by Illinois EPA for NAAQS compliance (*see*, e.g., Ex. 29 at 8-11)."[26] Thus, the Board's goal of trying to "limit and prevent potential sizeable shifts in generation and emissions from controlled to uncontrolled plants" and "foreclose a dramatic increase in annual emissions over the status quo" is not achieved with the SO_2 cap of 44,920 tons per year.[27]

[22] Ex. 50, Pre-filed Testimony of James Gignac at 6:19-22, *In re Amendments to 35 Ill. Adm. Code 225.233, Multi-Pollutant Standards*, R18-20 (Dec. 10, 2018).
[23] *Id.* at 6:6-22.
[24] *Id*. at 6:7-8.
[25] *Id.* at 6:11-14.
[26] *Id*. at 8:12-16.
[27] Opinion and Order of the Board, Proposed Rule, Second First Notice ("Order") at 53, 52, *In re Amendments to 35 Ill. Adm. Code 225.233, Multi-Pollutant Standards*, R18-20 (October 4, 2018).

8. Administrative Matters

In terms of certain recordkeeping and reporting matters, the Environmental Groups agree with some of the recommendations of the Illinois Attorney General's Office contained in the testimony of Andrew Armstrong.[28] Specifically, we agree with the recommendations that:

(1) "the annual and ozone season compliance reports required by subsections (k)(2)(A) and (B) also include information regarding all MPS units transferred, retired, or mothballed by the owner during the relevant compliance period,"

(2) "the Board require MPS owners to publicly maintain on their websites: (1) their most recently submitted compliance reports under subsections (k)(2)(A) and (B); and (2) any notices and reports under subsections (f)(3), (g)(3), (h)(3), (k)(3), and (k)(4) submitted to the Agency after the owner's submission of the most recent annual compliance report," and

(3) if the Board proceeds to final adoption of the rule, it include in the rule "a Board note identifying all MPS units that are mothballed at that time."[29]

9. Conclusion

Accordingly, based on the current record, the Environmental Groups urge the Board to decline to amend 35 Ill. Adm. Code 225.233. The Board should consider recent actual historical emissions, and should ensure that large shifts in generation – particularly from plants with pollution controls to plants without those protections – are not permitted. If, despite the shortcomings of a mass-based cap described in this proceeding, the Board determines that a mass-based cap is appropriate, the Board should set the annual caps at the levels calculated by the Attorney General's Office of 34,094 tons for SO_2 and 18,920 tons for NO_X. Additionally, thoughtful consideration on how to best mitigate potential negative impacts of a rule change on already disproportionately-impacted communities is warranted.

[28] Ex. 48, Pre-filed Testimony of Andrew Armstrong at 3-4, *In re Amendments to 35 Ill. Adm. Code 225.233, Multi-Pollutant Standards*, R18-20 (December 10, 2018).
[29] *Id*.

Respectfully submitted,

Christie Hicks
Manager, Clean Energy Regulatory Implementation
Environmental Defense Fund
18 S. Michigan Ave., 12th Fl.
Chicago, IL 60603
(314) 520-1035

Justin Vickers
Staff Attorney
Environmental Law & Policy Center
35 E. Wacker Drive, Suite 1600
Chicago, IL 60601
(312) 795-3736
jvickers@elpc.org

Faith Bugel
Attorney on behalf of Sierra Club
1004 Mohawk
Wilmette, IL 60091
fbugel@gmail.com

Brian P. Urbaszewski
Director, Environmental Health Programs
Respiratory Health Association
1440 W. Washington Blvd.
Chicago, IL 60607
(312) 628-0245

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CERTIFICATE OF SERVICE

The undersigned certifies that a true copy of the foregoing **NOTICE OF FILING** and **POST-HEARING COMMENTS OF ENVIRONMENTAL GROUPS** in R2018-20 were served upon the attached service list by e-mail or by depositing said documents in the United States Mail, postage prepaid, in Chicago, Illinois on March 15, 2019.

s/ Jocleyn Castro

Jocelyn Castro
Legal Assistant
Environmental Law & Policy Center
35 E. Wacker Dr., Suite 1600
Chicago, IL 60601
(312) 795-3719
jcastro@elpc.org

SERVICE LIST:

Marie Tipsord, Hearing Officer
Mark Powell, Senior Attorney
Don Brown, Clerk of the Board
Illinois Pollution Control Board James R.
Thompson Center Suite 11-500
100 W. Randolph Street
312-814-3461
Chicago, Illinois 60601
don.brown@illinois.gov
mark.powell@illinois.Gov
marie.tipsord@illinois.Gov

Renee Snow
Illinois Department of Natural Resources
One Natural Resources Way
Springfield, IL 62702-1271
217-782-1809 (phone)
217-524-9640 (fax)
renee.snow@illinois.gov

Gina Roccaforte
Dana Vetterhoffer
Antonette Palumbo
Illinois Environmental Protection Agency
1021 North Grand Avenue East

Amy C. Antoniolli
Joshua R. More
Ryan Granholm
Caitlin Ajax
Schiff Hardin LLP

P.O. Box 19276
Springfield, IL 62794-9276
217-782-5544 (phone)
217-782-9807 (fax)
gina.roccaforte@illinois.gov
dana.vetterhoffer@illinois.gov
antonette.palumbo@illinois.gov

233 S. Wacker Drive
Suite 6600
Chicago, IL 60606
312-258-5769
aantoniolli@schiffhardin.com
jmore@schiffhardin.com
rgranholm@schiffhardin.com
cajax@shiffhardin.com

Andrew Armstrong
Office of the Attorney General
500 South Second Street
Springfield, IL 62706
217-782-9031 (phone)
217-524-7740 (fax)
aarmstrong@atg.state.il.us

Greg Wannier
Staff Attorney
Sierra Club
2101 Webster St., Suite 1300
Oakland CA 94612
greg.wannier@sierraclub.org

James Gignac
Matthew J. Dunn
Stephen Sylvester
Office of the Attorney General
69 West Washington Street, Suite 1800
Chicago, IL 60602
312-814-2634 (phone)
312-814-2347 (fax)
jgignac@atg.state.il.us
mdunn@atg.state.il.us
ssylvester@atg.state.il.us

Faith Bugel
Attorney at Law
1004 Mohawk
Wilmette, IL 60091
fbugel@gmail.com

Katy Khayyat
Department of Commerce & Economic Opportunity
Small Business Office
500 East Monroe Street
217-785-6162 (phone)
Springfield, IL 62701
katy.khayyat@illinois.gov

Katherine D. Hodge
HelperBroom LLC
4340 Acer Grove Drive
500 East Monroe Street
Springfield, IL 62711
217-523-4900 (phone)
217-523-4948 (fax)
khodge@heplerbroom.com