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October 27, 2017

Illinois Pollution Control Board
100 W. Randolph Street
James R. Thompson Center, Suite 11-500
Chicago, Illinois 60601

To Whom it May Concern:

I am writing on behalf of three Peoria area environmental groups to request that an Illinois Pollution Control Board hearing be held in Peoria County on the rulemaking on the proposed amendments to the Illinois Multi-Pollutant Standard. The Central Illinois Healthy Community Alliance is an alliance of state and local organizations dedicated to a just transition for the Edwards coal plant in Bartonville, Illinois and a clean energy future for Illinois. Global Warming Solutions Group of Central Illinois is working to reduce CO2 emissions and curb global warming by advocating for policies that discourage use of fossil fuels and speed the transition to clean, renewable energy. Peoria Families Against Toxic Waste got its start fighting the expansion of a hazardous waste landfill in Peoria County and continues to fight to clean up all air, land and water pollution appearing on the county's Toxics Release Inventory.

As noted in the October 19, 2017 opinion and order of the Illinois Pollution Control Board, Peoria is one of seven counties where an electrical generating unit impacted by the Multi-Pollutant Standard rulemaking is located. Peoria county is by far the largest population center, at 185,006 in the latest 2016 census estimate, and larger than the other six impacted counties combined (111,469).

The Peoria area has always shown a sustained interest in clean air and water and the emissions of local electrical generating units. Significant numbers of Peorians have traveled to Springfield and Chicago to make public comments at USEPA and IEPA clean air and water proceedings as well as Illinois Pollution Control Board variance hearings. However, the number of Peorians able to take time off work and/or travel is significantly less than the number that have attended local hearings in downtown Peoria and at the Pekin public library. As an example, the April 2015 Clean Air Act Permit Program hearing for the Powerton plant, just across the river from Peoria County in Tazewell County, generated 29 oral comments worthy of note in IEPA's responsiveness summary.

It is our belief that failure to hold a hearing in the Peoria would demonstrate material prejudice against the majority of the individuals impacted by the changes to the Multi-Pollutant Standard. One of the key issues with the rulemaking is a concern that the move from a rate-based to a mass-based pollution standard will create pollution "hot spots." In a mass-based scenario, the lack of pollution controls on the

Edwards plant will allow Dynegy to ramp up coal burning at this comparatively less expensive-to-run plant to the detriment of the largest population area impacted by any of the plants covered in the rulemaking. Surely a failure to solicit public comment from the most significantly impacted area would be prejudicial under any definition of the word.

It is also our belief that oral testimony, and thus a local hearing, is essential to convey the true impact of pollution on Peoria area citizens' lives. Written comments do not carry the same emotional weight. It takes courage to speak out about personal health issues and missed work days and share fears about providing a safe and healthy environment for one's children and grandchildren. This courage is what lends power to personal testimony. We believe that those who have suffered decades of pollution from the Edwards plant deserve to see firsthand that someone is listening.

Thanks for your time and I look forward to hearing from you,

A handwritten signature in black ink that reads "Tracy Meints Fox". The signature is written in a cursive, flowing style.

Tracy Meints Fox

On behalf of

Central Illinois Healthy Community Alliance

Global Warming Solutions Groups of Central Illinois

Peoria Families Against Toxic Waste