

Dynegy Air Meeting Multi Pollution Standard

March 6, 2018 2:30-4:30 pm

Madison County Government Center County Board Room, 157 N. Main St.
Edwardsville, IL 62025

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MAR 12 2018

STATE OF ILLINOIS
Pollution Control Board

Thank you for conducting this meeting to discuss a lowering of the Multi Pollutant air emission standards. Poor air quality threatens the health of all of us and negatively impacts development in IL.

I have many concerns that the IEPA has effectively abdicated its responsibility to the health and safety of IL citizens. IEPA negotiated with Dynegy behind closed doors to write a revision that was favorable to Dynegy. This action by IEPA has skirted its true mission by failing to protect the health, welfare, property, and quality of life for residents.

This is disappointing to me. However, I have been disappointed many times before by how regulatory agencies, namely IEPA and IDNR/OMM, do not represent and honor the interests of citizens and communities. These agencies accommodate the coal mining-coal fired utility complex so as to approve the most convenient and the cheapest route for them with little regard to the damage to health, environment, and community. The toxicity of coal, coal slurry, coal ash, and coal tar was never addressed. My opinions concerning IEPA and IDNR/OMM are based on the construction of Deer Run Mine in Hillsboro, IL and the opening of Shay 1 Mine in Carlinville, IL.

I was appalled that IEPA along with IDNR/OMM approved underground coal slurry injection at the Shay 1 Mine. This was approved in IL at the same time that there was an underground coal slurry injection moratorium in WV due to extensive ground water contamination. At the public hearing, we were assured there would be no problem since our water resources are not like that found in WV. It bothered me that there was no plan to prevent or know where the coal slurry migrated. Underground coal slurry injection was cheaper than constructing another coal slurry impoundment.

Mary Ellen DeClue

The coal slurry injection has continued at this mine site where there was already ground water contamination from high hazard coal slurry impoundments for a decade. Coal ash is imported from other areas and states as part of the reclamation of the retiring impoundments. Coal ash is alkaline and helps to neutralize the acidic coal slurry, but coal ash has toxic metals like Hg, As, Pb, Cd, etc. There is extensive contamination of ground water at coal-fired power plants from coal ash according to a recent Associated Press article.

IEPA granted a lifetime air permit for Deer Run Mine with no requirements that fugitive dust be confined to the mine site. When the mine was active, coal dust permeated the community, and the hospital next door needed to change the air filters more frequently. There were 2 petitions, signed by 100's of local residents, directed to the IEPA asking for air monitors so residents could be aware of the quality of air that they were breathing. The requests for air monitors were denied and the community still does not have any air monitors. Particulate matter is one of the criteria air pollutants that are monitored across the U. S. and it is an established health threat. Why is a community subjected to a known health risk by regulatory agencies with no required monitoring?

Deer Run mine has been inactive since 2015 due to an underground fire that has produced carbon monoxide, and the fire was never extinguished even after sealing. That is an ongoing threat to the Hillsboro community that neither agency seems to acknowledge.

When Deer Run Mine was operating, the requirements for monitoring water discharges were inadequate to know whether the mine was in compliance with the CWA. The NPDES permits did not cover the most harmful chemicals in the discharges from the mine, or the quantities, or the total accumulations in the receiving streams. The conductivity was higher in surrounding streams that impaired the ecology and viability of the waters as existed in other coalfield streams in coal extraction states.

Lastly, the permanent placement of 2 high hazard coal slurry impoundments that upon failure would inundate the community causing

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loss of life and extensive property damage is right out of the coal baron's WV 's playbook. At the public hearing when asked why the impoundments were in the community and if there was a risk assessment done, the answer was that the agency doesn't do risk assessments.

When the realization that IEPA and the IDNR/OMM were not representing me, or my neighbors, or Montgomery County, I was disgusted and determined to tell the disastrous events that I have experience the last decade.

We must not go any more backwards; do not lower our quality of air, do not approve lower air standards.

Thank you,

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Submitted by
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Illinois has plenty of power, says new report. So, why bail out Dynegy's coal plants?

By [Christie Hicks](#) / [Bio](#) / Published: March 5, 2018

Since last year, [Dynegy has tried](#) to strong-arm Illinois legislators and regulators into allowing it to pollute more. To add insult to injury, the Texas-based energy giant wants to charge customers more to do so. It's a lose-lose for Illinoisans. And here's the kicker: A [new report](#) just revealed that Illinois has more than enough power without Dynegy's coal plants.



Dynegy has spent the past year targeting [environmental protections](#) at the Illinois Pollution Control Board, and has [re-introduced legislation](#) in Springfield that would give its uneconomic coal plants a \$400 million per-year bailout. Meanwhile, Dynegy is raking in [millions in profits](#). Moreover, Dynegy was acquired last week by Vistra Energy in a move that will generate [\\$4 billion in equity](#).

There is more than enough power in Illinois (termed “resource adequacy” in energy parlance) to keep the lights on and then some, confirms the [new report from the Illinois Commerce Commission](#) (ICC). The report is further evidence that Illinoisans should not have to bail out Dynegy’s polluting plants.

Well-supplied grid

The ICC report consolidated analyses and comments from [numerous stakeholders](#), including Environmental Defense Fund (EDF), almost all of whom agreed that available power resources exceed the needs of the region. (Those who didn’t agree include Dynegy and its connections.)

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Other sources back up this notion: Two separate, independent [studies](#) shows the region has 16-22 percent more available power resources than is needed. There are more than enough new resources currently in the pipeline (with more to come) to cover the potential retirement of Dynegy’s coal plants, and energy from other regions could be imported if necessary.

Simultaneously, there will be more energy efficiency and rooftop and community solar, spring-boarded by the [Future Energy Jobs Act](#). In other words, demand for energy is expected to decrease as supply steadily increases in the coming years.

In sum, there is plenty of power to meet Illinois’ electricity current and future needs.

Reliability is more than available power

One particular point of contention: “Resource adequacy” – having enough power available – is not the same as reliability, even though Dynegy often attempts to conflate the two in its comments in the ICC report. But more than power availability is needed to keep the lights on.

Reliability is the day-to-day, hour-by-hour, and second-by-second coordination between power plant owners and grid operators to serve the physical needs of sending and balancing electricity over large geographic areas.

Dynegy mixing the two in the report is an issue because the company’s legislative proposal seeks to lump reliability in with payments for “resource adequacy” – i.e. the company wants to be rewarded just for having its power plants available. This would be a huge step backward in a state that prides itself on grid modernization and innovation.

But wait, there’s more

In addition to Dynegy’s legislative push, the Illinois Pollution Control Board continues to consider the company’s request to weaken pollution standards.

[Buoyed by an ex-lobbyist](#) who is now director of the Illinois Environmental Protection Agency, Dynegy is pushing hard for a change that would allow their coal plants to emit nearly double the sulfur dioxide and nearly 80 percent more nitrogen oxide than the company’s Illinois fleet emitted in 2016. Sulfur dioxide and nitrogen oxide are both dangerous pollutants with severe health consequences.

Multiple groups, including EDF, [asked to stall the hearing](#) until the company’s merger with Vistra is complete, but were denied. Upcoming hearings in

Edwardsville and Springfield provide opportunities for public comment, and members of the public can [submit written comments](#) at any time.

Whether at the legislature or Pollution Control Board, Dynegy is determined to bail out its aging coal fleet. But the electric grid doesn't need these polluting power plants, and Illinoisans shouldn't have to pay for the plants with their health or their dollars.

Photo source: istock/RomanBabakin

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