

PUBLIC HEARING FOR DRAFT PERMITS  
AFFECTING THE PRAIRIE STATE GENERATING  
COMPANY, LLC

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

Report of proceedings had at  
the online public hearing, held via  
Webex, on the 5th day of February, 2026,  
commencing at the hour of 6:00 p.m.

APPEARANCES:

MR. JEFFREY J. GUY, Illinois EPA  
MS. SALLY CARTER, Illinois EPA  
MR. RYAN HENDRICKSON, Illinois EPA  
MR. GEOFFREY BLOOD, Illinois EPA

\* \* \* \* \*

1                   MR. GUY: Well, good  
2                   evening, everyone, and thank you  
3                   for being here. The time is  
4                   6:00 p.m. Central Time on  
5                   February 5, 2026. On behalf of  
6                   the Illinois Environmental  
7                   Protection Agency and its acting  
8                   director James Jennings, welcome  
9                   to tonight's public hearing.

10                  My name is Jeff Guy, and I  
11                  am the hearing officer for the  
12                  Illinois EPA. If you have  
13                  connection or audio issues, please  
14                  attempt to reconnect.

15                  The hearing is being  
16                  recorded, and the transcript will  
17                  be posted on the Illinois EPA  
18                  Bureau of Air "Permit Public  
19                  Notices" web page in the same  
20                  place where the public notice and  
21                  other pertinent documents have  
22                  been posted for public review.

23                  We look forward to receiving  
24                  your comments following the EPA's

1 opening remarks.

2 Tonight's proceeding is an  
3 informational hearing conducted in  
4 accordance with 35 Illinois  
5 Administrative Code, Part 166.  
6 These regulations are available on  
7 Illinois Pollution Control Board's  
8 website at [pcb.Illinois.gov](http://pcb.Illinois.gov).

9 My responsibility is to  
10 ensure that this hearing runs  
11 smoothly and in full compliance  
12 with these procedures. I am  
13 committed to treating everyone  
14 with courtesy, respect, and  
15 professionalism, and I ask that  
16 everyone extend the same  
17 consideration to one another.

18 Our shared goal is to  
19 maintain a constructive,  
20 respectful, and welcoming  
21 environment where all voices can  
22 be heard.

23 Prairie State Generating  
24 Company is undergoing three

1           permitting actions regarding the  
2           coal-fired power plant located at  
3           1739 Marigold Road, Marissa,  
4           Illinois.

5                     The main permitting action  
6           includes a new Clean Air Act  
7           Permit Program -- or CAAPP for  
8           short -- operating permit that  
9           will consolidate all applicable  
10          requirements of the federal Clean  
11          Air Act and the Illinois  
12          Environmental Protection Act.

13                    Additionally, the CAAPP  
14          permit will roll in the terms and  
15          conditions of issued permits, most  
16          notably the prevention of  
17          significant deterioration -- or  
18          PSD for short -- and state  
19          construction permit that the  
20          Illinois EPA issued to Prairie  
21          State in April of 2005.

22                    Permitting actions also  
23          include a revision to a term of  
24          the PSD and state construction

1 permit and the CAAPP permit and  
2 the processing of a Clean Air Act  
3 Acid Rain permit. Illinois EPA  
4 Bureau of Air staff will provide  
5 more information on the permitting  
6 actions momentarily.

7 Following a review of the  
8 application materials submitted by  
9 Prairie State, the Illinois EPA  
10 has made the preliminary  
11 determination that the permits  
12 should be granted. Draft permits  
13 are now available for public  
14 review.

15 Written comments may be  
16 submitted until the close of the  
17 public comment period at  
18 11:59 p.m. Central Time on  
19 March 9, 2026. All correspondence  
20 should reference Prairie State  
21 Generating Company, LLC. Comments  
22 may be submitted to the Illinois  
23 EPA by e-mail or mail.

24 The instructions for

1 submitting written comments,  
2 including the e-mail address and  
3 the mailing address, can be found  
4 in the public notice on the  
5 Illinois EPA Bureau of Air "Permit  
6 Public Notices" web page.

7 After the record closes, the  
8 Illinois EPA will prepare a  
9 responsiveness summary, which will  
10 be posted on the Illinois Bureau  
11 of Air public notices web page.  
12 This summary will include  
13 significant public comment, the  
14 agency's responses and a statement  
15 of final action.

16 At this time Illinois EPA  
17 Bureau staff will provide an  
18 overview of the draft permit, and  
19 then we will begin to take your  
20 public comments.

21 MS. CARTER: Good evening.  
22 This is Sally Carter, assistant  
23 counsel.

24 MR. HENDRICKSON: Good

1           evening. My name is Ryan  
2           Hendrickson. I am the manager for  
3           the Clean Air Act Permit Program  
4           Unit, or CAAPP Unit, in the Bureau  
5           of Air Permit Section.

6                     Thank you for attending this  
7           public hearing regarding three  
8           permit transactions: One, a new  
9           draft CAAPP permit for Prairie  
10          State Generating Station, known as  
11          Prairie State, which includes;  
12          two, a revision to a term of the  
13          underlying prevention of  
14          significant deterioration, PSD,  
15          and state construction permit in  
16          the CAAPP permit; and, three, the  
17          processing of a Clean Air Act Acid  
18          Rain permit contained within the  
19          CAAPP permit.

20                    As the hearing officer has  
21          stated, we are here this evening  
22          to take comments on these three  
23          permitting actions. As such, I  
24          would like to give a brief

1 overview of the CAAPP program, the  
2 revision to a term of the PSD  
3 permit and the Acid Rain permit.  
4 Then Jeffery will discuss more  
5 about Prairie State and their  
6 draft CAAPP permit.

7 The permitting action for  
8 this public hearing is the planned  
9 issuance of the CAAPP program for  
10 Prairie State. The CAAPP program,  
11 or what may commonly be referred  
12 to as the Title V Program,  
13 requires that a single operating  
14 permit be issued to address all  
15 applicable requirements for the  
16 various emission units and  
17 activities at a major stationary  
18 source.

19 A benefit of CAAPP permits  
20 over other operating permits is  
21 that the compliance methods,  
22 meaning the provisions for  
23 monitoring, testing, and  
24 recordkeeping, are developed when

1 an applicable requirement does not  
2 already require adequate periodic  
3 testing or monitoring.

4 This assures that a source  
5 can reasonably demonstrate its  
6 ability to comply with emission  
7 limits and standards.  
8 Additionally, there are more  
9 reporting requirements to provide  
10 for a source accountability, which  
11 also provides the means for the  
12 United States Environmental  
13 Protection Agency, or US EPA, and  
14 the public to enforce the terms of  
15 the permit.

16 For a CAAPP permit to become  
17 effective, it must be posted for  
18 public comment and reviewed by the  
19 US EPA. The US EPA may object to  
20 the permit if any of the terms and  
21 conditions in the permit are not  
22 consistent with the CAAPP  
23 requirements in the Illinois  
24 Environmental Protection Act.

1           The second permitting action  
2           is one revision to the underlying  
3           PSD and state construction permit,  
4           which the Illinois EPA issued to  
5           Prairie State in April 2025.

6           One of the terms of the PSD  
7           permit is an emission limit for  
8           each coal-fired boiler  
9           of 0.035 pounds per million  
10          British thermal units -- pounds  
11          per million BTU -- for particulate  
12          matter with a diameter of ten  
13          microns or less, PM10.

14          However, the permit terms  
15          allowed for later consideration by  
16          the Illinois EPA of whether the  
17          units could meet a more stringent  
18          limit but no lower  
19          than 0.018 pounds per million BTU,  
20          which is roughly half of the  
21          original limit.

22          The emission limit reflects  
23          a prior demonstration of best  
24          available control technology,

1           known as BACT, which is an  
2           important feature of the PSD  
3           Program.

4                   Based on the facility's  
5           emission data, the Illinois EPA  
6           has determined that Prairie State  
7           can meet a more stringent emission  
8           limit of 0.08 pounds per million  
9           BTU and is, therefore, revising  
10          the PSD permit through the CAAPP's  
11          procedures for this draft CAAPP  
12          permit.

13                   Consistent with the terms of  
14          the PSD permit, corresponding  
15          hourly and annual limits for PM10  
16          would also be lowered in kind.  
17          There are no other changes to the  
18          PSD permit.

19                   The third permitting action  
20          addresses Prairie State's  
21          obligation to hold a permit under  
22          the Clean Air Act's Acid Rain  
23          Program.

24                   The draft Acid Rain permit,

1 contained within the CAAPP permit,  
2 addresses the two coal-fired  
3 boilers operating at this plant  
4 because they are affected electric  
5 generating units -- known as  
6 EGUs -- and emit both sulfur  
7 dioxide and nitrogen oxides.  
8 These pollutants are the main  
9 precursors of acid rain.

10 The Acid Rain permit  
11 requires the source to hold SO2  
12 allowances to account for the SO2  
13 emissions of the boilers. An  
14 allowance is a limited  
15 authorization to emit 1 ton of SO2  
16 on or after a given calendar year.

17 The draft Acid Rain permit  
18 also addresses the limit that  
19 applies to the emissions of NOx of  
20 the boilers. The draft Acid Rain  
21 permit also contains the emission  
22 monitoring and reporting  
23 requirements for both pollutants  
24 under the Acid Rain Program.

1                   I will now turn it over to  
2                   Geoffrey Blood who will provide  
3                   some general information about  
4                   Prairie State and the draft CAAPP  
5                   permit.

6                   MR. BLOOD:    Good afternoon.  
7                   My name is Geoffrey Blood, and I  
8                   am a permit analyst for the CAAPP  
9                   Unit in the Bureau of Air Permit  
10                  Section.

11                  Thank you for attending this  
12                  public hearing regarding the  
13                  planned issuance of the CAAPP  
14                  permit for Prairie State  
15                  Generating Station.

16                  I would like to give a brief  
17                  overview of Prairie State  
18                  Generating Station, or Prairie  
19                  State.

20                  Prairie State is a  
21                  mine-mouth, coal-fired  
22                  steam-electric generating station  
23                  with a nominal capacity  
24                  of 1,600 megawatts which commenced

1 construction in 2007. The  
2 facility consists of an  
3 underground coal mine, power  
4 plant, and coal combustion  
5 residuals disposal facility.

6 The main generating units  
7 comprising Prairie State are  
8 coal-fired steam boilers referred  
9 to as Unit 1 and Unit 2.  
10 Additional emission units at the  
11 source include a natural gas-fired  
12 auxiliary boiler, cooling towers,  
13 haul roads, material transfer  
14 points, transfer points at the  
15 coal mine, coal combustion  
16 residuals disposal facility, and  
17 storage silos.

18 Prairie State requires a  
19 CAAPP permit because the Unit 1  
20 and Unit 2 coal-fired boilers are  
21 subject to acid rain deposition  
22 control and because the source  
23 exceeds major source thresholds  
24 for particulate matter, also known

1 as PM; sulfur dioxide, or SO<sub>2</sub>;  
2 volatile organic material, VOM;  
3 carbon monoxide, or CO; nitrogen  
4 oxide, or NO<sub>x</sub>; and hazardous air  
5 pollutants, or HAPs.

6 The coal-fired boilers are  
7 subject to the new source  
8 performance standards, or NSPS,  
9 for electric utility steam  
10 generating units, designated as  
11 Subpart Da, and the national  
12 emission standards for hazardous  
13 air pollutants, or NESHAP, for  
14 coal-fired electric utility steam  
15 generating units, designated as  
16 Subpart UUUUU, also known as 5Us.

17 The auxiliary boiler is  
18 subject to the NSPS for  
19 industrial, commercial,  
20 institutional steam generating  
21 units, designated as Subpart Db,  
22 and the NESHAP or HAP major  
23 sources with industrial,  
24 commercial, and institutional

1           boilers, designated at  
2           Subpart DDDDD, also known as 5Ds.

3                   The bulk material handling,  
4           processing, and storage operations  
5           are subject to the NSPS for coal  
6           preparation and processing plants,  
7           designated as Subpart Y, and the  
8           NSPS for nonmetallic mineral  
9           processing plants designated as  
10          Subpart 000, also known as  
11          triple 0.

12                   Prairie State was issued a  
13          state construction permit and PSD  
14          approval on April 28th, 2005.  
15          That permit authorized Prairie  
16          State to construct its plant.  
17          Prairie State timely submitted an  
18          application for a CAAPP permit in  
19          2010.

20                   The construction permit, in  
21          conjunction with Prairie State's  
22          timely submittal of a complete  
23          CAAPP application and subsequent  
24          updates to the application,

1           authorizes Prairie State to  
2           operate the plant until a CAAPP  
3           permit is issued, as authorized by  
4           Illinois Environmental Protection  
5           Act.

6                     An issued CAAPP permit  
7           grants authority for continued  
8           operation and has a five-year  
9           term.

10                    The Illinois EPA has  
11           prepared the draft CAAPP permit  
12           and is now presenting it to the  
13           public for review. Additional  
14           details regarding the source and  
15           the draft CAAPP permit are  
16           contained in the Statement of  
17           Basis that accompanies the draft  
18           CAAPP permit on the Illinois EPA's  
19           "Public Notices" web page.

20                    I would now like to  
21           transition back to Jeff Guy who  
22           will discuss more about the  
23           hearing.

24                    MR. GUY: Thank you.

1                   This hearing is being held  
2                   to gather public comments on the  
3                   draft permits for inclusion in the  
4                   official record. All comments  
5                   provided today will be carefully  
6                   reviewed and considered as part of  
7                   the decision-making process.

8                   Illinois EPA staff will be  
9                   available during this hearing to  
10                  listen to comments and provide  
11                  responses when possible; however,  
12                  some questions may require  
13                  additional review before a  
14                  complete answer can be given.

15                  When information is readily  
16                  available, staff will address  
17                  comments during the hearing;  
18                  otherwise, responses will be  
19                  included in the official  
20                  responsiveness summary.

21                  We want everyone to feel  
22                  comfortable, respected, and heard.  
23                  So to maintain a constructive and  
24                  courteous environment, please keep

1           comments focused on the draft  
2           permit.

3                       This portion of the hearing  
4           is designed for public comment,  
5           not for debate, demands for  
6           immediate answers, or extended  
7           dialogue with Illinois EPA staff.  
8           Personal attacks, foul language,  
9           and off-topic comments are not  
10          allowed. If discussions begin to  
11          move in that direction, I may step  
12          in and ask the speaker to return  
13          to the next relevant point.

14                      Individuals who engage in  
15          disruptive or disrespectful  
16          comments may be removed to ensure  
17          the hearing proceeds fairly and  
18          orderly.

19                      We will accept public  
20          comments from those that have  
21          registered. When I call on you to  
22          speak, state your name and  
23          affiliation for the record. And  
24          for the benefit of creating an

1 accurate record, please spell your  
2 last name.

3 Speakers will be called in  
4 the order of registration. To  
5 ensure everyone has an opportunity  
6 to speak, please limit your  
7 comments to no longer than five  
8 minutes.

9 If you have extensive  
10 comments, please consider giving  
11 only a summary of your comments  
12 and then submitting the entirety  
13 of your comments to us in writing  
14 before the end of comment period.  
15 Written comments are equally  
16 important and will be fully a  
17 considered in the decision-making  
18 process.

19 As a reminder, online  
20 attendees are muted automatically.  
21 We will unmute only the current  
22 speaker one at a time. When it is  
23 your turn to speak, I will call  
24 your name.

1                   And I think the only person  
2                   that's -- we have a lot of people  
3                   who have registered and we were  
4                   able to identify all of them  
5                   except for one, and we'll get to  
6                   that.

7                   So Eileen Russell, if you're  
8                   here, just send us a message in  
9                   the chat or raise your hand.

10                  Otherwise, everybody that is  
11                  present that has registered.

12                  So as a final reminder  
13                  before we start accepting public  
14                  comment comments -- well, a couple  
15                  things -- we're not going to take  
16                  public comments through the chat.  
17                  So if you want to make a comment,  
18                  either make it orally when we call  
19                  on you or you can submit a written  
20                  comment.

21                  Today's discussions will  
22                  focus exclusively technical  
23                  issues, terms, and conditions of  
24                  the draft permit. And, again, we

1 ask that all comments remain  
2 relevant and respectful.

3 So with that, we'll go ahead  
4 and get started. Our first  
5 speaker is Ross Bunton.

6 Ross, go ahead.

7 MR. BUNTON: Good evening.  
8 Thank you for the opportunity to  
9 speak today. My name is Ross  
10 Bunton, and I am the environmental  
11 director at the Prairie State  
12 Energy Campus.

13 Today I'm speaking on behalf  
14 of our 650 employees, our  
15 not-for-profit public power owners  
16 and more than a thousand union  
17 tradesmen and women that support  
18 our campus.

19 The Prairie State Energy  
20 Campus is located in Washington  
21 County, Illinois, and is comprised  
22 of a 1,600 megawatt coal-fired  
23 power plant and adjacent  
24 underground coal mine.

1                   The Illinois EPA first  
2                   issued Prairie State a prevention  
3                   of significant deterioration or  
4                   PSD permit in April of 2005, which  
5                   set very stringent environmental  
6                   standards for our facility and  
7                   with which we've been proud to  
8                   comply.

9                   Prairie State came on line  
10                  during the Obama-Biden  
11                  administration in 2012 after  
12                  having been purpose-built with  
13                  over a billion dollars' worth of  
14                  best-available control technology  
15                  and a super critical boiler,  
16                  making Prairie State the most  
17                  efficient coal-fired power plant  
18                  in Illinois and one of the most  
19                  efficient in the country.

20                  Prairie State is wholly  
21                  owned by not-for-profit  
22                  municipalities and rural electric  
23                  cooperatives located across  
24                  Illinois and seven other

1           Midwestern states.

2                     Our energy campus provides a  
3           stable source of affordable,  
4           baseload power to dozens of  
5           communities across Illinois.  
6           Collectively, our owners serve  
7           more than 2.5 million families and  
8           business.

9                     While other forms of  
10          electricity depend on conditions  
11          like weather and wind, baseload  
12          power generated by Prairie State  
13          is readily available 24/7. That  
14          means when temperatures spike or  
15          plummet, our facility is there to  
16          ensure that families stay safe  
17          with reliable and affordable  
18          electricity.

19                    Despite our investment in  
20          technology and history of  
21          environmental compliance and  
22          sustainability, others continue to  
23          put forth misinformation about our  
24          facility. I want to ensure that

1           the record recognizes that Prairie  
2           State produces significantly more  
3           electricity than every other  
4           fossil plant in the state.

5                     And we do so more  
6           efficiently, effectively producing  
7           more electricity per ton of coal  
8           than any other plant in the state.  
9           That means that Prairie State gets  
10          better gas mileage, so to speak,  
11          than any other coal plant in  
12          Illinois.

13                    Illinois is headed towards a  
14          steep energy deficit. A recent  
15          report by the Illinois Power  
16          Agency, Illinois EPA, and Illinois  
17          Commerce Commission warns that  
18          regional grid operators serving  
19          Illinois will see electricity  
20          shortages as soon as 2029 because  
21          other facilities have been forced  
22          to close even as demand increases.

23                    That makes the dispatchable  
24          baseload power provided by Prairie

1 State even more critical as  
2 Illinois transitions to a  
3 greener-energy future.

4 To that end, we are pleased  
5 to see our Title V application  
6 moving forward. As a facility  
7 wholly owned by public power, we  
8 continuously seek to implement  
9 operational improvements in  
10 cooperation with state and federal  
11 regulators.

12 We remain dedicated to  
13 working with the agency towards  
14 the issuance of a final Title V  
15 permit that accurately reflects  
16 the stringent state and federal  
17 laws and regulations applicable to  
18 our campus while at the same time  
19 ensuring that we can continue  
20 providing value to the communities  
21 we serve, creating jobs and  
22 economic prosperity throughout  
23 downstate Illinois.

24 Thank you for your time

1           today.

2                   MR. GUY: Thank you, Ross.  
3           Appreciate that.

4                   Next is Josh Shallenberger  
5           followed by Dana Wynn-Stockert.

6                   Josh, go ahead.

7                   MR. SHALLENBERGER: Thank  
8           you, Jeff.

9                   Good evening. My name is  
10          Josh Shallenberger,  
11          S-H-A-L-L-E-N-B-E-R-G-E-R. I'm  
12          here on behalf of Shelby Electric  
13          Cooperative, a member of Prairie  
14          Power, Incorporated, which holds  
15          an 8 percent ownership stake in  
16          Prairie State Generating Company.

17                  As a rural electric  
18          cooperative, Shelby provides  
19          electricity, propane, and  
20          broadband to the true last mile,  
21          serving 10,000 meters  
22          across 2,500 square miles in South  
23          Central Illinois.

24                  Because we are member-owned

1           and governed, our mission is  
2           closely aligned with the needs of  
3           the communities we serve. Prairie  
4           State is a cornerstone of our  
5           energy portfolio, delivering the  
6           kind of dependable, baseload  
7           generation that shields consumers  
8           from volatile energy and capacity  
9           markets.

10                   This liability is not just  
11           the theoretical. It was put to  
12           the test recently during the MISO  
13           EEA Level 2c maximum generation  
14           emergency on January 24, 2026,  
15           when temperatures hovered around  
16           13 and a half degrees Fahrenheit  
17           with 20-mile-an-hour winds in our  
18           service area.

19                   During that event, we came  
20           within one operational step of  
21           rolling blackouts, an outcome that  
22           would have been devastating for  
23           our numbers. It underscored a  
24           crucial truth: Dependable,

1           dispatchable, baseload generation  
2           remains essential during periods  
3           of peak demand.

4                         While renewable energy will  
5           continue to grow and play an  
6           important role in the future, the  
7           reality is that new technologies  
8           and transmission infrastructure  
9           take time and significant  
10          investment to deploy. In the  
11          meantime, Illinois cannot afford  
12          to jeopardize reliability or risk  
13          energy shortfalls during the most  
14          critical hours of need.

15                        That is precisely why  
16          Prairie State plays such a vital  
17          role. Its mine-mouth operation  
18          ensures a secure, always available  
19          fuel source, making it uniquely  
20          suited to support grid resiliency  
21          and complement intermittent  
22          resources.

23                        It's is also important to  
24          highlight Prairie State's

1 environmental performance,  
2 something often overlooked in  
3 public discussions.

4 The facility was designed  
5 and built using the best available  
6 control technology, representing  
7 a \$1 billion investment. As a  
8 result, Prairie State generates  
9 more electricity than any other  
10 fossil plant in Illinois while  
11 still achieving exceptional  
12 emissions and efficiency  
13 performance.

14 Leaving that context out is  
15 like condemning a bus for emitting  
16 more exhaust than a single car,  
17 ignoring the far greater number of  
18 passengers served.

19 Beyond reliability and  
20 environmental performance, Prairie  
21 State also delivers tremendous  
22 economic value. The campus  
23 contributes over \$785 million  
24 annually to the Illinois economy

1           and supports more  
2           than 650 full-time jobs across the  
3           plant, line, and corporate office.

4                     Additionally, more  
5           than 1,000 skilled tradespeople --  
6           boilermakers, pipers fitters,  
7           millwrights, ironworkers,  
8           electricians, laborers, operators,  
9           and carpenters -- perform ongoing  
10          maintenance that keeps the  
11          facility safe and operational.  
12          These are livelihoods that support  
13          families and communities  
14          throughout downstate Illinois.

15                    For all these reasons, we  
16          urge you to avoid any permitting  
17          outcomes that could curtail  
18          Prairie State's operations. Doing  
19          so would expose our cooperative  
20          members to the unpredictable  
21          wholesale market and the risk of  
22          steep cost increases at a time  
23          when reliability has never been  
24          more essential.

1                   Rural Illinois depends on  
2                   Prairie State for stable,  
3                   affordable energy. But more than  
4                   that, our regional and state  
5                   economies depend on it as well.

6                   Thank you for your time this  
7                   evening.

8                   MR. GUY: Thank you for your  
9                   comments, Josh.

10                  Next is Dana Wynn-Stockert  
11                  followed by Adrienne Naumann.  
12                  Give me one second here.

13                  Dana, go ahead.

14                  MS. WYNN-STOCKERT: --  
15                  that's W-Y-N-N, hyphen,  
16                  S-T-O-C-K-E-R-T.

17                  I am simply a concerned  
18                  citizen and resident of Alton. I  
19                  work in East St. Louis, and I'm  
20                  just joining tonight to stress the  
21                  importance of the need for  
22                  bringing the Prairie State  
23                  facility into compliance with the  
24                  Clean Air Act with this permit.

1 I am in support of the  
2 IEPA's more astringent guidelines  
3 to the draft permit, and I just  
4 also wanted to share that, you  
5 know, pollution knows no  
6 geographic boundaries.

7 So it's critical not only  
8 for the residents in and around  
9 Marissa, Illinois, that the  
10 facility come into compliance with  
11 those Clean Air Act requirements,  
12 but it's also critical for just  
13 the residents of Illinois and  
14 especially of Southern Illinois.  
15 And that can extend all the way,  
16 you know, to East St. Louis.

17 So I just am coming on to  
18 say that I'm in support of the  
19 IEPA and EPA ensuring that this  
20 facility comes into compliance  
21 with obtaining the appropriate  
22 Clean Air Act permits required,  
23 and that was it.

24 MR. GUY: Well, thank you,

1 Dana. Appreciate your comments.

2 Next we'll have Adrienne  
3 Naumann followed by Eileen Russel  
4 and then Jean Korte. Sorry if I  
5 mispronounce anyone's name.

6 MS. NAUMANN: Yes. Yes, I  
7 am.

8 MR. GUY: We're getting some  
9 feedback, so you might want to  
10 turn your device down.

11 (WHEREUPON, a discussion  
12 was held off the record  
13 and the proceedings  
14 continued as follows.)

15 MS. NAUMANN: My name is  
16 Adrienne Naumann, N-A-U-M-A-N-N.  
17 And I was originally here on  
18 behalf of Sierra Club, but also  
19 there's a few things I wanted to  
20 hit on that may be where I diverge  
21 from them.

22 We've heard from two folks  
23 who support Prairie State and have  
24 vested interest in Prairie State.

1 I respect that. I understand it  
2 provides a lot of jobs and  
3 everybody relies on it because  
4 it's big and reliable.

5 But that kind of begs the  
6 question: What's going on with  
7 the pollution? I would support  
8 any draft operating permit that  
9 really significantly tightens up  
10 what the pollution problem is with  
11 Prairie State.

12 My individual --  
13 (inaudible) -- be in charge of  
14 this kind of thing for Exelon is  
15 that the place should be shut  
16 down. But I understand that's not  
17 going to happen, so, yes, I  
18 support anything that's more  
19 stringent.

20 I did notice that people  
21 that supported Prairie State  
22 really didn't have a lot to say  
23 about compliance. I'd like to  
24 remind them that Sierra Club sued

1           them a few years ago because they  
2           weren't doing a really good job  
3           with people's -- maybe were doing  
4           a good job with people's jobs but  
5           weren't doing a good job with  
6           people's health.

7                         So it makes me wonder. I  
8           don't really think they've ever  
9           been in compliance. I don't  
10          understand why they never had an  
11          operating permit. I don't think  
12          blaming the agency is the whole  
13          answer to why they did that and  
14          then were sued by Sierra Club.

15                        That's pretty much all I  
16          have to say. As I said, I support  
17          any draft operating permit in the  
18          real world that would tighten up  
19          and provide more oversight for  
20          Prairie State, respectfully.

21                        And thank you very much for  
22          your time.

23                        MR. GUY: Thank you.

24                        And for the record, that's

1 Adrienne Naumann, and it's spelled  
2 A-D-R-I-E-N-N-E, N-A-U-M-A-N-N.

3 Eileen Russell was the only  
4 registered speaker that we weren't  
5 to able to identify yet. And if  
6 you are there, Eileen, just use  
7 the "raise hand" feature on Webex.  
8 You can just hover over your name  
9 area or your phone number and use  
10 that raise hand.

11 So, Eileen, are you there?  
12 We don't see you. So we are going  
13 to move on to Jean Korte -- sorry  
14 if I mispronounced that --  
15 K-O-R-T-E, followed by Luke  
16 Johnson.

17 Go ahead, Jean.

18 MS. KORTE: My name is Jean  
19 Korte, K-O-R-T-E. I spent my  
20 career in corporate accounting. I  
21 served on internal audit teams, so  
22 I know the importance of being  
23 specific when it comes to  
24 procedures.

1                   My question for the Illinois  
2                   EPA staff who are monitoring these  
3                   hearings: What changes to  
4                   procedures are being put in  
5                   place -- I'm echoing a bit -- that  
6                   would move a complex Title V  
7                   permit application forward rather  
8                   than allowing the whole  
9                   application to languish for  
10                  over 13 years?

11                  The public has been missing  
12                  out on transparency and oversight.  
13                  For example, advocates for Prairie  
14                  State Generating Company have told  
15                  city leaders all over the state  
16                  that what you see coming out of  
17                  the smokestacks is just water  
18                  vapor or steam.

19                  A member of the Naperville  
20                  Public Utilities Advisory Board  
21                  believed this and stated it. The  
22                  statement is chemically untrue.

23                  While Prairie State may be  
24                  more efficient than any other coal

1 plant in the state, the 2023 data  
2 that Prairie State did submit to  
3 the EPA shows that Prairie State  
4 is the largest greenhouse gas  
5 emitter in the state of Illinois,  
6 mostly due pollutants riding on  
7 that water vapor -- 12 million  
8 tons of carbon  
9 dioxide, 2.8 million pounds of  
10 methane, 9 tons of sulfur  
11 dioxide, 3.9 tons of nitrogen  
12 oxides.

13 The science is clear:  
14 Scrubbers do not  
15 capture 100 percent of the  
16 pollutants. Prairie State  
17 emissions are accelerating climate  
18 change. We see it and extreme  
19 weather.

20 We see it on our homeowner's  
21 insurance bills that are  
22 increasing every year. Prairie  
23 State pollution imposes  
24 substantial external costs on

1 communities through health harms  
2 and climate impacts that are not  
3 reflected in the price of the  
4 electricity.

5 I ask the EPA to include in  
6 the permit introduction language  
7 refuting that what is coming out  
8 of the Prairie State smokestack is  
9 just water vapor and impose  
10 penalties on individuals who  
11 promote this chemically untrue  
12 statement.

13 In closing, I look forward  
14 to an enforced Title V operating  
15 permit to increase publically  
16 available performance, audit, and  
17 inspection reports as well as  
18 increased greenhouse gas data.

19 Thank you to the Illinois  
20 EPA for the important work that  
21 you do.

22 MR. GUY: Thank you, Jean.  
23 Appreciate your comment.

24 Our next speaker is Luke

1 Johnson followed by Thomas Beyers  
2 and then Christine Main.

3 Give us one second here.

4 Okay. Luke, go ahead.

5 MR. JOHNSON: My name is  
6 Luke Johnson, and that's  
7 J-O-H-N-S-O-N, and I am proud to  
8 be speaking today on behalf of  
9 Tri-County Electric Cooperative.

10 Our electric cooperative  
11 provides electric power to over  
12 16,000 residential, agricultural,  
13 commercial, and industrial  
14 customers in Jefferson, Marion,  
15 and Washington Counties.

16 Tri-County is a member of  
17 Southern Illinois Power  
18 Cooperative, which is one of the  
19 90 not-for-profit owners of the  
20 Prairie State Energy Campus. As a  
21 rural electric cooperative, we  
22 serve what has become known as the  
23 last mile, meaning we've made it  
24 our mission to provide electric

1 service in remote, low-density  
2 rural areas when -- (inaudible) --  
3 utilities often do not want to  
4 operate.

5 Customers rely on this every  
6 hour, every day, to deliver  
7 dependable, affordable electricity  
8 that keeps farms operating, small  
9 businesses running, and families  
10 safe and warm during all kinds of  
11 weather.

12 Prairie State plays an  
13 essential role in our energy  
14 portfolio. Its reliable baseload  
15 generation helps insulate our  
16 members in the volatility of the  
17 broader power markets where sudden  
18 cost spikes or supply shortages  
19 can have immediate powerful  
20 impacts of some of the people we  
21 serve.

22 The importance of Prairie  
23 State in our energy portfolio has  
24 been clearer now more than ever.

1           A recent period of extreme,  
2           prolonged cold stressed the  
3           electric grid across Illinois and  
4           much of the Midwest.

5                   Wind and solar production  
6           dropped sharply during critical  
7           hours and natural gas supplies  
8           tightened. Our electric coop and  
9           many others in the utility sector  
10          across the region were forced to  
11          issue energy conservation calls to  
12          customers while preparing for the  
13          possibility of rolling outages.

14                   Unfortunately, events like  
15          these are no longer rare. Extreme  
16          weather in winter and summer alike  
17          is placing increasing strain on  
18          our grid. As Illinois and  
19          surrounding states confront a  
20          period of high demand and  
21          tightened supply, Prairie State  
22          remains a critical anchor for  
23          affordability and reliability.

24                   While renewable energy

1 continues to grow and will remain  
2 part of our long-term strategy,  
3 current technology does not yet  
4 allow us to reliably power the  
5 grid without dispatchable  
6 resources. If policies get ahead  
7 of technology, reliability will  
8 suffer and rural communities will  
9 pay the price.

10 Prairie State is not only  
11 reliable. It is also one of the  
12 cleanest and most efficient  
13 coal-fired facilities in the  
14 country. The owners of Prairie  
15 State, which includes Tri-County,  
16 invested more than \$1 billion to  
17 install modern environmental  
18 controls.

19 Prairie State has  
20 demonstrated a strong ongoing  
21 commitment to responsible  
22 operations and environmental  
23 stewardship, and we ask that a  
24 final permit reflect exactly that.

1                   Any permitting decision that  
2                   curtails operations would expose  
3                   our cooperative and its members to  
4                   unpredictable energy --  
5                   (inaudible) -- market and  
6                   potentially crippling cost  
7                   increases. Rural Illinois relies  
8                   on Prairie State for energy, but  
9                   so does the stability of our state  
10                  and regional economy.

11                  I thank you for your time.

12                  MR. GUY: Thank you, Luke.  
13                  Appreciate your comments.

14                  Next is Thomas Beyers  
15                  followed by Christine Main and  
16                  then Verena Owen. Tom Beyers, and  
17                  that's B-E-Y-E-R-S.

18                  Go ahead, Thomas.

19                  MR. BEYERS: Hope you can  
20                  hear me. Thank you. I'm here  
21                  today on behalf of the Tri-County  
22                  Electric Cooperative board on  
23                  which I serve as president.  
24                  Tri-County serves

1 over 16,000 residential,  
2 agricultural, commercial, and  
3 industrial customers in Jefferson,  
4 Marion, and Washington Counties.

5 Tri-County has gone beyond  
6 the traditional services to farms  
7 and rural homes and now also  
8 serves to large industrial  
9 members. We're proud to serve the  
10 traditional rural constituents as  
11 well as these new businesses.

12 Tri-County is a member of  
13 the Southern Illinois Power  
14 Cooperative, a generation and  
15 transmission cooperative that has  
16 an ownership stake in the Prairie  
17 State Energy Campus.

18 Prairie State is an anchor  
19 in our energy portfolio providing  
20 baseload generation that helps  
21 insulate customers from  
22 fluctuations in the energy and  
23 capacity markets that can drive up  
24 cost and threaten reliability.

1                   As Illinois and the rest of  
2                   the region enters a time of high  
3                   energy demand and short supply,  
4                   Prairie State is vital to  
5                   providing rate stability and  
6                   affordability for our members.

7                   Prairie State is uniquely  
8                   positioned to provide grid  
9                   resiliency and serve as a backstop  
10                  to intermittent generation  
11                  sources. Prairie State is  
12                  constantly seeking ways to reduce  
13                  its overall carbon footprint while  
14                  implementing substantial business  
15                  practices -- excuse me --  
16                  sustainable business practices.

17                  The power generated by  
18                  Prairie State helps limit the need  
19                  for power to be imported from  
20                  neighboring states from power  
21                  plants with less stringent  
22                  environmental standards.

23                  Prairie State can and should  
24                  serve as a bridge to a cleaner

1 energy future, supplementing  
2 renewable energy resources that  
3 are not yet able to fill the gap  
4 between demand and production.

5 Prairie State is proud to  
6 provide economic prosperity for  
7 communities across downstate  
8 Illinois, adding more  
9 than \$785 million a year to the  
10 state's economy. The campus  
11 supports more than 650 full-time  
12 jobs across the power plant line  
13 and corporate office. The  
14 facility's 2025 charitable giving  
15 program assisted over 160 local  
16 organizations throughout the year.

17 From youth sports teams to  
18 chambers of commerce and more,  
19 Prairie State has provided a  
20 commitment to serving as a good  
21 steward of our economy, our  
22 environment, and our electric  
23 grid.

24 I urge you to adopt

1 commonsense regulations that allow  
2 for continued, responsible  
3 operations. Rural Illinois relies  
4 on Prairie State for energy, but  
5 our region and state economy is  
6 also at stake.

7 Thank you for your time, and  
8 thanks for the opportunity to  
9 comment.

10 MR. GUY: Thank you, Thomas.

11 Next is Christine Main,  
12 M-A-I-N, followed by Verena Owen  
13 and then David Main.

14 Christine, go ahead.

15 MS. MAIN: As you said, my  
16 name is spelled M-A-I-N. I'm  
17 speaking on behalf of myself  
18 tonight. I reside in Champaign,  
19 Illinois, and I've been an  
20 Illinois resident for 53 years.

21 Before I begin, I want to  
22 express my gratitude for this  
23 opportunity to speak. Having one  
24 of nation's top polluters

1 relatively nearby is a point of  
2 distinction that ought to concern  
3 every citizen.

4 My first three points have  
5 to do with enhanced air monitoring  
6 and reporting. I think that the  
7 permit should require continuous  
8 and comprehensive to emissions  
9 monitoring to ensure the public  
10 health and to mitigate  
11 climate-harming emissions.  
12 Likewise, pollution control  
13 equipment must be continually  
14 monitored to guard against  
15 breakdowns and malfunctions.

16 Secondly, during times of  
17 potential pollution spikes like  
18 startup and shutdown, there should  
19 be carefully determined limits for  
20 emissions.

21 Third, there needs to be  
22 mandatory annual emission reports  
23 detailing CO2 and other greenhouse  
24 gases ensure limits are not

1 exceeded.

2 My next comments have to do  
3 with adhering to the Climate and  
4 Equitable Jobs Act. The permit  
5 must require that Prairie State  
6 reduce carbon emissions by  
7 45 percent by 2035 and then,  
8 by 2045 be 100 percent carbon  
9 free.

10 Also, there should be  
11 rolling 12-month emission limits,  
12 by which I mean a cap on  
13 emissions, where no unit may  
14 exceed its previous 12-month  
15 emission levels for CO2 or  
16 co-pollutants.

17 Under the heading of  
18 pollution control equipment, there  
19 should be language in the permit  
20 that addresses the imperative to  
21 properly maintain state of the  
22 art, best available control  
23 technology.

24 Likewise, thorough

1 recordkeeping regarding the  
2 maintenance of this equipment is  
3 essential. Should a malfunction  
4 of pollution control equipment  
5 occur, the permit must require  
6 that the plant shut down rather  
7 than continue to operate and  
8 violate emission standards.

9 With regard to the 750-acre  
10 landfill operated by Prairie  
11 State, the permit should have  
12 strict regulations on landfill and  
13 coal ash, including restrictions  
14 against importing ash from other  
15 sites. Every precaution must be  
16 taken to protect workers and to  
17 prevent groundwater contamination.

18 That concludes my comments.  
19 And, again, I thank you for  
20 allowing me this chance to speak  
21 to this critical issue in our  
22 state's history.

23 MR. GUY: Thank you,  
24 Christine. I appreciate that.

1                   Next is Verena Owen,  
2                   O-W-E-N, followed by David Main.

3                   Verena, go ahead.

4                   MS. OWEN: Thank you. This  
5                   is Verena Owen. I normally spell  
6                   my first name because that's more  
7                   of a challenge. That is  
8                   V-E-R-E-N-A. And my last name is  
9                   O-W-E-N.

10                  Thank you for this  
11                  opportunity to be able to address  
12                  you to tonight. Let me tell you a  
13                  little bit about myself before I  
14                  get started.

15                  Twenty-five years ago I was  
16                  one of the first two graduates  
17                  from Title V training that EPA  
18                  provided to the public. I later  
19                  was invited to attend an advanced  
20                  training and ended up being part  
21                  of a two-year EPA task force to  
22                  review the federal Title V permit.

23                  I spent the next decade in  
24                  Illinois fighting for permits for

1 all the existing coal plants that  
2 had not gotten an initial Title V  
3 permit, and they were all a decade  
4 late.

5 So, yes, and today I'm  
6 commenting on a permit that is,  
7 again, over a decade late. So one  
8 of my questions is: Why? Why are  
9 we still doing this? Why are you  
10 still doing this?

11 Twenty-five years. I would have  
12 assumed some progress in the  
13 issuance of these permits to large  
14 polluters in this state.

15 I am deeply disappointed,  
16 and I actually question: How dare  
17 you? Because what happens is that  
18 the public is the one who has to  
19 carry the burden to compel you do  
20 your job and what is required by  
21 the law, and that has to stop.

22 And this cannot be explained  
23 by a lack of funding or staff  
24 time. The Title V Permit Program

1 is a self-funded program. If you  
2 don't have the time or the staff  
3 to do it, go ask your legislator  
4 to raise the fees. This is a  
5 burden for the public that is  
6 unacceptable.

7 I am most concerned -- I am  
8 concerned with quite a few things  
9 in the permit, but I'm most  
10 concerned about underlying Title V  
11 conditions that don't have an  
12 origin in the regulations. Those  
13 are IEPA's discretionary decisions  
14 that in this case are 20 years  
15 old.

16 I will give you an example,  
17 and I point out that I am a member  
18 of the Sierra Club, and the Sierra  
19 Club and I will send in technical  
20 and lengthy comments before the  
21 end of the comment period. I'm  
22 just giving you a sample of some  
23 of the things that I'm concerned  
24 with.

1                   For instance, a fuel  
2                   management plan, instead of  
3                   having -- it should define fuel  
4                   criteria and mandatory monitoring  
5                   and testing and detailed operation  
6                   practices.

7                   Right now the permit just  
8                   shrugs on these issues and says  
9                   something about "shall handle the  
10                  fuel" instead of implement  
11                  standard operating procedures.  
12                  Those kind of discretionary  
13                  decisions have to be reviewed and  
14                  have to be addressed.

15                  It has to be -- one other  
16                  thing that we always bring up is  
17                  prompt reporting. Prompt  
18                  reporting is not 30 days later.  
19                  This facility has record of late  
20                  reporting. And I urge you very  
21                  much to redefine prompt reporting  
22                  when it endangers the public. And  
23                  when there is a real release that  
24                  is of concern, like mercury, that

1 prompt reporting is much faster  
2 than 30 days.

3 There's issues with startup,  
4 shutdown, and malfunction. This  
5 cannot be open ended. Please  
6 define this. We have asked for  
7 that for a long time. It is still  
8 not correctly done.

9 For malfunctions, again, the  
10 permit only speaks of repair. It  
11 should be a root cause analysis  
12 for all malfunctions exceeding the  
13 specific number of hours and  
14 implement corrective action to  
15 prevent reoccurrence. This permit  
16 is very industry friendly and very  
17 public and friendly, and that has  
18 to stop.

19 And lastly, and the biggest  
20 issue, is that there is no  
21 enforceable glide path to  
22 100 percent carbon-free operations  
23 by 2025 in this permit. It is  
24 required by CEJA that the plant

1           operate 100 percent carbon free  
2           by 2045, and it is a major flaw in  
3           the permit that is there are  
4           absolutely no provisions for the  
5           state law in the permit.

6                        So in closing, I urge IEPA  
7           to carefully consider all our  
8           comments and to issue a strong and  
9           clear and an enforceable, a  
10          protective and a transparent  
11          Title V permit. Thank you for  
12          your time.

13                      MR. GUY: Thank you, Verena.  
14          I appreciate that.

15                      And just a reminder, we are  
16          not accepting public comments  
17          through the chat. I do appreciate  
18          the input, but those aren't going  
19          to be included in the public  
20          record. So we can have you  
21          provide oral comments this  
22          evening, or you can submit written  
23          comments in writing at the  
24          beginning of the comment period.

1                   Next is David Main followed  
2                   by Michael Ondek. I'm sorry if I  
3                   pronounce that incorrectly.

4                   O-N-D-E-K.

5                   David Main.

6                   MR. MAIN: Good evening.

7                   I'm David Main, M-A-I-N. I'm a  
8                   retired pulmonary physician  
9                   of 38 years in Champaign,  
10                  Illinois.

11                  And probably the major  
12                  reason I want to talk tonight is,  
13                  over my 38 years in practice, it  
14                  was very common that patients  
15                  would mention to me that they had  
16                  various environmental issues that  
17                  came their way, in my cases often,  
18                  talking about asthma making their  
19                  chronic obstructive pulmonary  
20                  disease worse, there being  
21                  instances of lung cancer and  
22                  various other problems.

23                  So for that reason, it's  
24                  incredibly important that we

1 address the environmental aspects  
2 of Prairie State's generating  
3 operation.

4 I wanted to cite the 2021  
5 United States Clean Air Task Force  
6 calculation of 76 premature deaths  
7 in Illinois in 2019. That was  
8 based on Prairie State's PM2.5  
9 levels.

10 It's just not acceptable,  
11 that kind of premature death as a  
12 result of putting this sort of the  
13 pollution into the air. We expect  
14 improvements in the future. I  
15 expect this draft proposal will  
16 reflect that.

17 We know that Prairie State  
18 produces emissions of sulfur  
19 dioxide, nitrogen oxides, mercury,  
20 carbon dioxide, methane, each with  
21 its own consequence that I won't  
22 go into here. That's a long, long  
23 lecture that I would do in my  
24 medical classes which I still

1 occasionally do.

2 We should not accept Prairie  
3 State continuing to be the twelfth  
4 largest carbon dioxide in the  
5 United States -- at least as of  
6 2019 and, I think, more recent  
7 years as well -- as well as the  
8 largest producer in Illinois of  
9 methane, sulfur dioxide, nitrogen  
10 oxide.

11 It's been well discussed by  
12 prior participants that this is an  
13 important electricity generating  
14 plant. I accept that. But do we  
15 need to accept that it's making  
16 people sick? That it's making  
17 people even lose their life?  
18 Quite frankly, I don't think so.

19 So me and my patients ask  
20 EPA to set maximum emission  
21 thresholds for things like carbon  
22 dioxide, methane, sulfur dioxide,  
23 and nitrogen oxides that achieve  
24 levels below historic levels -- in

1           other words, achieve levels that  
2           are better than what the plant has  
3           produced in the past -- and also  
4           that protect us all from health  
5           problems.

6                     One example of change in  
7           your proposed draft, I would  
8           suggest, is your annual sulfur  
9           dioxide limit that you've set at  
10          less than 11,866 tons for two  
11          combined boilers at Prairie State.

12                    That level is above the  
13          observed 9,280 tons observed by  
14          US EPA in 2023. That lack of  
15          improvement from the present just  
16          really isn't acceptable. It ought  
17          to be set lower because you can.  
18          That's why. These same comments  
19          would apply to your recommended  
20          emission thresholds for nitrogen  
21          oxides and greenhouse gases,  
22          namely, carbon dioxide and  
23          methane.

24                    We ask that Illinois EPA

1           insist on Prairie State meeting  
2           the CEJA requirement of  
3           the 45 percent reduction in carbon  
4           dioxide emissions by 2035 --  
5           again, why is that? Because you  
6           can -- and achieve no emissions  
7           by 2045.

8                     If your argument is that you  
9           can achieve that by carbon  
10          sequestration, well, I think we  
11          all know or all recognize that  
12          that argument is -- well, it is  
13          indeed an argument, and that  
14          carbon sequestration at the very  
15          large industrial level has not  
16          been demonstrated to be successful  
17          as yet, it's extremely expensive,  
18          and the sequestered carbon takes a  
19          lot of the energy.

20                    One projection is that to  
21          sequester the carbon dioxide,  
22          putting it down deep below the  
23          ground, you're going to use  
24          about 15 to 25 percent of the

1 energy that the plant has  
2 generated. That, obviously, is  
3 not very efficient. So just  
4 making the point that to rely on  
5 the carbon sequestration to  
6 achieve a greenhouse gas  
7 prevention -- definitely arguable.

8 So to close, we rely on the  
9 proposed draft to protect us all  
10 from higher-than-necessary rates  
11 of asthma, chronic obstructive  
12 pulmonary disease, lung cancer,  
13 cardio vascular disease --  
14 primarily, that's due to the  
15 particulate material that's in the  
16 air -- neurological problems --  
17 such as from mercury -- premature  
18 deaths, and minimizing climate  
19 change.

20 Anything less just really  
21 isn't acceptable. This is 2026.  
22 Thank you for your time.  
23 Appreciate your work, EPA.

24 MR. GUY: Thank you, David.

1 Appreciate that.

2 Michael Ondek, O-N-D-E-K,  
3 followed by Rick Terven and Ivy  
4 Sundell.

5 Mike, go ahead.

6 MR. ONDEK: Great. As he  
7 said, my name is Mike Ondek,  
8 O-N-D-E-K, and I'm an Illinois  
9 resident, a volunteer supervisor  
10 with the Northern Illinois Food  
11 Bank, a natural resources  
12 volunteer with the Forest Preserve  
13 District of DuPage County, member  
14 of the Sierra Club, and a  
15 parishioner of St. Walter Church  
16 in Roselle.

17 I care deeply about my  
18 community and the environment,  
19 which is why I'm speaking today.  
20 The Prairie State Coal Plant is  
21 the largest coal plant in Illinois  
22 and the largest emitter of  
23 greenhouse gases in all of  
24 Illinois.

1                   According to the World  
2                   Meteorological Organization, the  
3                   past 11 years have been  
4                   the 11 hottest years on record.  
5                   Scientific consensus is that this  
6                   warming is caused by greenhouse  
7                   gases, and the Prairie State Coal  
8                   Plant is the worst contributor of  
9                   these gases in our state, making  
10                  our world more unlivable for  
11                  millions.

12                  The Prairie State Coal Plant  
13                  is the largest emitter of sulfur  
14                  dioxide and nitric oxide in the  
15                  state. Sulfur dioxide and nitric  
16                  oxide can cause wheezing,  
17                  shortness of breath, long-term  
18                  reductions in lung function,  
19                  increased inflammation of the  
20                  airways, and increased likelihood  
21                  of emergency room and hospital  
22                  admissions.

23                  The Clean Air Act is  
24                  supposed to require large sources

1 of air pollution such as the  
2 Prairie State Coal Plant to obtain  
3 operating permits before the  
4 facility is able to begin  
5 operations and requiring updates  
6 every five years.

7 This plant has been  
8 operating since 2012, operating  
9 without an original permit and the  
10 two five-year reviews that should  
11 have been required. The whole  
12 time, they've been releasing  
13 poisonous chemicals, greenhouse  
14 gases that are heating up our  
15 world and hurting our health  
16 without any oversight.

17 The IEPA must do its job and  
18 ensure that the plant is in  
19 compliance with the Clean Air Act.  
20 For the health of our local  
21 communities and environment and  
22 the climate of the entire world,  
23 we need to limit these chemicals  
24 the plant is spewing into our

1 air 24 hours a day, seven days a  
2 week.

3 To issue this draft  
4 permit 14 years late and allowing  
5 our state's worst greenhouse gas  
6 sulfur dioxide and nitric oxide  
7 polluters to continue operating  
8 without a permit is not right.  
9 This cannot happen again. The  
10 communities across Illinois  
11 deserve strong protections under a  
12 robust final operating permit.

13 Thank you for your time and  
14 consideration.

15 MS. CARTER: Thank you for  
16 your comment.

17 This is Sally Carter, and I  
18 just wanted to make a point of  
19 clarification or just provide some  
20 additional information to just  
21 maybe address some of your  
22 concerns with regard to the fact  
23 that there hasn't been any  
24 purported oversight of Prairie

1 State during this time.

2 Just wanted to point out,  
3 you know, that this source has  
4 been and has to comply with all  
5 applicable requirements, those  
6 that are established in federal  
7 regulations, state regulations,  
8 applicable construction permits.

9 Prairie State does do, you  
10 know, continuous emissions  
11 monitoring. Some of these  
12 pollutants, they are required to  
13 do stack testing. They do submit  
14 required reports to the agency.  
15 These can include deviation  
16 reports, annual emission reports,  
17 quarterly reports, reports of that  
18 frequency.

19 When these reports do come  
20 in to the agency, the agency  
21 compliance staff does review these  
22 reports. They work to verify the  
23 compliance status of the facility.  
24 The facility is also inspected by

1           our Field Operations Section.

2                   So I just did want to maybe  
3           alleviate any concerns or any  
4           thought that there was an  
5           oversight of what is going on at  
6           Prairie State. The agency has  
7           been and continues to monitor the  
8           environmental compliance of the  
9           facility. Thank you.

10                   MR. GUY: Okay.

11                   Thanks, again, Mike.

12                   And next is Rick Terven and  
13           then followed by Ivy Sundell and  
14           then Amanda P-A-N-K-A-U. And,  
15           again, I apologize if I've  
16           mispronounced anyone's name.

17                   Rick?

18                   MR. TERVEN: Good evening.  
19           My name is Rick Terven. It's  
20           T-E-R-V-E-N. I serve as vice  
21           president of the Illinois AFL-CIO  
22           executive board as well as the  
23           legislative director for the  
24           Illinois Pipe Trades Association.

1           The Pipe Trades represents  
2           more than 30,000 union plumbers,  
3           pipe fitters, sprinkler fitters,  
4           welders, and HVAC technicians  
5           across the state of Illinois. I  
6           am here tonight to express our  
7           support for the approval of the  
8           operating permit for the Prairie  
9           State generating facility.

10           As other speakers have  
11           mentioned, Prairie State is a  
12           major economic driver for  
13           Southwest Illinois. Among the  
14           more than a thousand skilled union  
15           workers, several hundred of those  
16           are ones who are directly  
17           represented by the Illinois pipe  
18           trades.

19           These are good-paying,  
20           middle-class jobs with strong  
21           benefits, jobs held by people who  
22           live in the area, raise families,  
23           and contribute directly to their  
24           local economy.

1                   In 2025 alone, plant  
2                   maintenance and operations  
3                   represent more than a \$60 million  
4                   investment in the regional  
5                   workforce. On a broader scale,  
6                   the loss of Prairie State would  
7                   have serious consequences for all  
8                   of Illinois.

9                   Prematurely removing a major  
10                  baseload resource would undermine  
11                  grid reliability, discourage  
12                  large-scale economic development,  
13                  and put thousands of jobs at risk.  
14                  This is all at a time when  
15                  Illinois should be strengthening  
16                  its position as a place to live,  
17                  work, and invest.

18                  And what was made abundantly  
19                  clear by the Resource Adequacy  
20                  Study released by the State of the  
21                  Illinois, we are facing  
22                  significant challenges in meeting  
23                  future energy needs. Reliable  
24                  baseload generation remains

1           essential, and Illinois will need  
2           an all-of-the-above energy  
3           approach if it is going to  
4           successfully meet the challenges  
5           outline in that study.

6                        As you consider these permit  
7           actions, we respectfully encourage  
8           a thoughtful assessment of the  
9           critical role Prairie State plays  
10          in maintaining power reliability,  
11          supporting economic development,  
12          and sustaining high-quality jobs  
13          across the state, all while  
14          continuing to operate under  
15          existing strong environmental  
16          standards and regulatory  
17          oversight.

18                        Thank you.

19                        MR. GUY: Thanks, Rick.

20                        Next is Ivy Sundell,  
21          S-U-N-D-E-L-L, followed by Amanda.

22                        Go ahead, Ivy.

23                        MS. SUNDELL: Hi. This is  
24          Ivy Sundell. I'm a rate payer in

1 Northern Illinois. It is well  
2 known that Prairie State Coal  
3 Plant is the largest air polluter  
4 in Illinois, as everybody else  
5 mentioned.

6 What I didn't know until now  
7 is that Prairie State has never  
8 obtained an operating permit  
9 for 14 years. That means that  
10 even if you were monitoring,  
11 nobody was making them keep the  
12 emissions down for 14 years.

13 You can say that I am in  
14 Northern Illinois. But air has no  
15 boundaries and the emissions and  
16 the fine particulate matters can  
17 be blown 300 miles away from  
18 smokestacks to where my neighbors  
19 and I live in Winnetka, setting  
20 into our lungs and bloodstreams  
21 and causing premature deaths.

22 The 12.4 million metric tons  
23 of carbon dioxide contributes to  
24 climate change. It represents a

1 good portion of what our planet  
2 can't just naturally absorb.  
3 Having an operating permit means  
4 that there would be regular  
5 monitoring and reporting of  
6 groundwater contamination and coal  
7 ash and the mercury level that  
8 exceeded federal standards.

9 Coal plants can be deadly.  
10 Please don't let it kill us before  
11 the coal plant closes in 2045 or  
12 being repurposed. And that is  
13 still 19 years from now. So we  
14 have a lot more years before we  
15 don't have the coal plants  
16 anymore.

17 So, please, do something.  
18 Keep the emissions down. Thank  
19 you.

20 MR. GUY: Thank you, Ivy.

21 Next is Amanda. And I'm  
22 going to let pronounce your last  
23 name and spell it, if you don't  
24 mind. Go ahead, Amanda.

1 MS. PANKAU: -- with the  
2 nonprofit Prairie Rivers Network.  
3 Thank you for the opportunity to  
4 speak. I had a chance to join you  
5 in person Marissa on Tuesday night  
6 and wanted to follow up here, ask  
7 a couple more questions, share a  
8 couple different things --  
9 (connection drop).

10 (WHEREUPON, a discussion  
11 was held off the record  
12 and the proceedings  
13 continued as follows.)

14 MR. GUY: Can we just have  
15 you start over?

16 MS. PANKAU: Is this better?

17 MR. GUY: That's better.

18 MS. PANKAU: Good evening.  
19 My name is Amanda Pankau. I am  
20 the director of energy and  
21 community resiliency with the  
22 nonprofit Prairie Rivers Network.  
23 I wanted to, again, thank  
24 the Illinois EPA for a chance to

1 speak. I had a chance to join you  
2 in Marissa on Tuesday evening as  
3 well, so I just had a couple  
4 additional questions and wanted to  
5 reiterate some of the things I  
6 shared for the benefit of the  
7 folks on the line tonight.

8 So as I did on Tuesday  
9 night, I did want to begin by  
10 acknowledging the economic impact  
11 of this plant and the jobs it  
12 provides, but for the purposes of  
13 this hearing and the air permit,  
14 we need to make sure that this  
15 proposed permit complies with  
16 applicable air quality laws and  
17 regulations, including emission  
18 limits, monitoring, and protection  
19 of public health.

20 And so I respectfully ask  
21 the agency to limit its own  
22 consideration to the statutory  
23 criteria governing this permit and  
24 not weigh factors that are outside

1           its legal authority.

2                   This issue really cannot be  
3           framed as jobs/economy versus  
4           environment and public health.  
5           When a plant is this large and  
6           consequential, it has a  
7           responsibility to operate with the  
8           absolute best pollution controls  
9           available and to consistently meet  
10          or even exceed its legal  
11          obligations to protect public  
12          health and the environment.

13                   And as we've heard from  
14          folks tonight, for the  
15          last 14 years, the plant has the  
16          largest stationary source of air  
17          pollution in Illinois has operated  
18          without a Clean Air Act operating  
19          permit.

20                   So I have gotten this  
21          question from folks, and so I  
22          wanted to go ahead and  
23          specifically ask it to the  
24          Illinois EPA. Why was the Prairie

1 State Coal Plant allowed to  
2 operate for 14 years without the  
3 necessary Clean Air Act permit?

4 MS. CARTER: I believe -- I  
5 can't recall -- this is Sally  
6 Carter. I can't recall what I've  
7 said at each hearing, so I  
8 apologize.

9 But I will say that, in  
10 terms of the amount of time that  
11 it has taken to get to the point  
12 of having a draft permit to public  
13 notice, the agency can simply  
14 acknowledge that the permitting of  
15 this facility has taken longer  
16 than it should have.

17 The CAAPP permitting  
18 process for this source, you know,  
19 has involved several  
20 administrative steps, you know,  
21 including application revisions,  
22 regulatory updates, things of that  
23 nature.

24 I can also assure you that

1 the draft CAAPP permit that we've  
2 gone to public notice with  
3 reflects most recent application  
4 materials and current regulatory  
5 requirement.

6 I can also assure you that,  
7 when the agency makes its final  
8 permitting decision, the agency  
9 will be looking to its statutory  
10 authority and will be acting  
11 consistent with its statutory  
12 authority.

13 MS. PANKAU: Thank you. So  
14 kind of similar question along the  
15 of how they've been operating in  
16 the past. So I'm curious to know  
17 if they have ever submitted a  
18 signed compliance certification  
19 and if you think that the  
20 monitoring and reporting they have  
21 done so far has been adequate.

22 MS. CARTER: To answer the  
23 first part of that question, in  
24 terms of annual compliance

1 certification, they have never  
2 submitted that.

3 And what was your second  
4 part of the question again?

5 MS. PANKAU: If you think  
6 that the monitoring and reporting  
7 that they have done so far was  
8 adequate.

9 MS. CARTER: That is one  
10 question the is very nuanced. So  
11 I think that that is one that we  
12 would have to necessarily answer  
13 in the responsiveness of summary.  
14 And I will be honest with you.  
15 I'm not entirely certain on your  
16 question.

17 So I would ask that you  
18 provide that in further detail  
19 with further clarification in your  
20 written comment. And I assure  
21 that the agency will thoroughly  
22 consider and respond to that  
23 question.

24 MS. PANKAU: Yeah. Thank

1           you very much.

2                   A couple more things. So on  
3           Tuesday night, I talked a little  
4           bit about how the National Park  
5           Service had shared very specific  
6           recommendations with Illinois EPA,  
7           very specific concerns about  
8           sulfur dioxide pollution, and  
9           very, very specific  
10          recommendations on actions that  
11          could taken at the Prairie State  
12          Coal Plant to further reduce  
13          sulfur dioxide emissions.

14                   So I would like to hear in  
15          the responsiveness summary kind of  
16          a reflection on those. And I  
17          don't know if I need to list them  
18          out in my written comments for you  
19          guys to respond to them.

20                   But one thing that was  
21          curious to me was the very low  
22          emissions of sulfur dioxide in the  
23          first few years of this plant's  
24          operation. So they were -- at

1 Unit 2 they had 0.1 pounds per  
2 million British thermal units; and  
3 at Unit 1, 0.12, even down to  
4 0.11.

5 And then, those levels have  
6 increased over the years. So one  
7 of the things the Park Service  
8 said was if they can omit that  
9 low, why are we not requiring them  
10 to emit that low?

11 So I'd like, maybe, an  
12 analysis or some consideration  
13 from Illinois EPA on those past  
14 emissions, lower emissions, and if  
15 we could be asking them to have a  
16 lower rate, given that they have  
17 proved that their own scrubbers  
18 have achieved those lower emission  
19 rates in the past.

20 I won't reiterate some of  
21 the other things that I said  
22 Tuesday night, but I did want to  
23 reiterate as I said Tuesday night,  
24 that this air permit is not the

1           only environmental permit and  
2           regulation that the Prairie State  
3           Coal Plant has fallen short on  
4           complying with.

5                       Surface water, groundwater,  
6           as well as coal ash are concerns  
7           at the mine and the plant. And  
8           particularly, we have not seen  
9           groundwater pollution monitoring  
10          for coal ash contaminant since  
11          2018.

12                      So, again, I would just like  
13          to ask the Illinois EPA to work  
14          with the applicant and possibly  
15          the US EPA to better understand  
16          how the public can have data and  
17          some assurances about potential  
18          groundwater contamination from  
19          coal ash at this site.

20                      And in closing, just, thank  
21          you again, and I hope that the  
22          Illinois EPA issues a strong final  
23          operating permit in a timely  
24          manner with the strongest

1           protections possible. Thank you.

2           MR. GUY: Thank you, Amanda.  
3           The only other person that didn't  
4           get to speak -- and I've mentioned  
5           their name a few times -- is  
6           Eileen Russell, and I haven't  
7           heard Eileen.

8           So if you are in the  
9           attendance box there, Eileen, just  
10          shoot us a message on the chat or  
11          use the "raise hand" feature on  
12          Webex.

13          At this time, I'm going to  
14          go ahead and open it up for  
15          anybody else that would like to  
16          provide a comment before we close  
17          this evening.

18          If you would like to provide  
19          a comment, just, again, use the  
20          "raise hand" feature on Webex or,  
21          if you called in, you can use  
22          star 3. So we're going to give --  
23          anybody that wants to have one  
24          final opportunity to speak, this

1           would be the time.

2                   Okay.  Adrienne, go ahead.

3                   MS. NAUMANN:  Some of the --  
4           I didn't think I'd have to  
5           raise -- just raise some of the  
6           points I raised in the chat that  
7           kind of came to me while people  
8           were talking.

9                   The first one, of course, is  
10          that the people who are not real  
11          happy with Prairie State are  
12          concerned about the health and the  
13          environment.  The only response  
14          we've had from the proponents for  
15          Prairie State are that their  
16          economy down there would collapse  
17          without Prairie State, and they  
18          wouldn't have any electricity  
19          without Prairie State.

20                  I put it in my latest entry  
21          in the chat.  And I know just a  
22          little bit, about as much as you,  
23          as your agency.  But because my  
24          husband was an executive at Exelon

1           during a lot of this time, some of  
2           the --

3                       MR. GUY: We're getting a  
4           lot of echo and feedback, and I'm  
5           having a really hard time  
6           understanding you. I think that  
7           happened the first time you spoke  
8           too.

9                       So I'm going to kindly ask  
10          that you submit your comments to  
11          us in writing and we will fully  
12          consider them as part of the  
13          responsiveness summary, unless you  
14          can get your audio connection  
15          fixed somehow, because I don't  
16          think our court reporter's going  
17          to be able to pick up, you know,  
18          what you're saying for our  
19          transcript.

20                      I'm sorry. We're going to  
21          have to go ahead and move on.

22                      Is there anybody else that  
23          would like to make a final comment  
24          this evening before we conclude?

1           Again, you can use the "raise  
2           hand" feature or you can send us  
3           the message in the chat.

4                   And I apologize for having  
5           to disconnect you, but we couldn't  
6           understand quite a bit of what you  
7           were saying.

8                   Okay. Last chance for  
9           anybody to make a final comment.  
10          If not, I'm going to close the  
11          hearing.

12                   Okay. Doesn't look like  
13          anybody else wishes to provide a  
14          comment.

15                   So that's going to conclude  
16          our public comment portion of  
17          tonight's hearing. Again, we  
18          thank you for your participation.  
19          If you did not wish to speak,  
20          please do so in writing. You can  
21          submit your comments through  
22          writing by March 9, 2026, of  
23          course, which is the end of the  
24          public comment period.

1                   The documents related to  
2                   these permitting actions are  
3                   available on the Illinois EPA  
4                   Bureau of Air "Permit Public  
5                   Notices" web page, at Illinois EPA  
6                   offices in Springfield and  
7                   Collinsville, and at the Marissa  
8                   Library.

9                   Those addresses, contact  
10                  information, and other pertinent  
11                  information can be found in the  
12                  public notice. You can always  
13                  contact myself if you have  
14                  questions or need assistance with  
15                  anything.

16                  Again, we appreciate all the  
17                  comments. Thanks for  
18                  participating and engaging with  
19                  this process. Again, those  
20                  written comments will be accepted  
21                  until 11:59 Central Time on  
22                  March 9, 2026, and we value input  
23                  as we move forward in this matter.

24                  The current hearing time

1 is 7:15 p.m. Central Time, and  
2 this hearing is officially  
3 adjourned. Good night.

4 (Which were all the  
5 proceedings had at the meeting of  
6 the above-entitled cause.)

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1       STATE OF                    )  
           ILLINOIS                )  
 2                                    ) SS.  
           COUNTY OF            )  
 3       DuPAGE                    )

4  
 5                                    I, SERENA M. BONIFAZI, CSR,  
 6       duly qualified and commissioned for the  
 7       State of Illinois, County of DuPAGE, do  
 8       hereby certify that I reported in  
 9       shorthand the proceedings had and  
 10      testimony taken at the meeting of the  
 11      above-entitled cause, and that the  
 12      foregoing transcript is a true, correct,  
 13      and complete report of the entire  
 14      testimony so taken at the time and place  
 15      hereinabove set forth.

16  
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 24

*Serena M. Bonifazi*

SERENA M. BONIFAZI

CSR License 084-004849





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