

**From:** [Dustin Tripp](#)  
**To:** [Brown, Don](#)  
**Subject:** [External] Public Comment on Case # AS 2021-006  
**Date:** Friday, June 27, 2025 1:31:03 PM

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Dear Mr. Brown,

My name is Dustin Tripp and I have been a resident of Southern Illinois for over 45 years.

I am writing this in reference to Case # AS 2021-006 regarding Southern Illinois Power Cooperative's (SIPC) Adjusted Standard Request before the Illinois Pollution Control Board.

The IEPA has asserted that SIPC operates or operated certain ponds as CCR ponds. SIPC never sent CCR to many of these ponds and current samples and test results confirm that there is no or incredibly low CCR in these ponds. The current IEPA regulation regarding CCR ponds does not include a "diminimus" definition for CCR in ponds. Given that cinders (from numerous sources throughout the state) have been used on roadways throughout the state for many years to improve public safety by providing better traction on slick roads, the lack of a "diminimus" definition in the IEPA regulation for regulating CCR ponds is over-reaching and very troublesome. It is very plausible, if not likely, that cinders placed on roadways throughout the years have washed into road ditches and further into additional waterways and bodies of water. A "diminimus" definition for regulating CCR ponds is necessary.

This overreach of the IEPA due to their lack of a "diminimus" definition will cost SIPC and the residents of Southern Illinois millions of dollars with no benefit to the environment. SIPC never sent CCR materials to these ponds. The residents of Southern Illinois should not be required to pay millions to the IEPA for no environmental benefit.

Additionally, SIPC operated a landfill that IEPA has acknowledged under the Land Rules is a regulated landfill. However, the IEPA is now alleging that the landfill is a CCR pond under the Water Rules. SIPC has agreed to and has been preparing to close the landfill area in a protective manner in accordance with the Illinois landfill regulations.

Thank you for the opportunity to provide comments regarding this case.

Sincerely,

Dustin Tripp