

SIPC PUBLIC COMMENTS

If it pleases the Board, I would like to express a couple of thoughts about the history and culture I have experienced from Southern Illinois Power Cooperative (SIPC), which I believe are pertinent to the issue before you.

SIPC was created in the early 1960s to support the rural electrification of Southern Illinois, including some of the poorest counties in the State. The initial generation units (Unit 123) which are still in operation were designed and built to clean up and consume what is commonly called Carbon or coal washing process waste deposited throughout Southern Illinois for several decades. This product is the coal fines that were previously deposited in various nearby settling ponds. In general, a 40% carbon and 60% coal blend is the desired fuel of choice for this Unit 123 by design. For over forty-five years SIPC has been purchasing this product from different contractors working on various sites in the area who have secured Permits overseen by the IDNR to remove this product from the spoiled sites or brown fields of previous abandoned coal mine operations. Eventually all the carbon is removed, and the site is remediated to near original conditions with natural vegetation and thriving wildlife.

SIPC has been assisting with environmentally responsible activities from the beginning. SIPC continues to pursue these clean ups and recently approved a contract to purchase from an additional site for which such a clean-up will not likely without the revenue SIPC can support by purchasing the fuel to generate electricity. Through the decades SIPC has been involved in the remediation of dozens of these sites. One of the public comments on June 10 at the Marion IPCB hearing referred to the Will Scarlet (Red) site, SIPC has been and still is trying to work with the contractor and the owner to purchase the Carbon from that site and thereby assist with the remediation of this site which is likely to otherwise become the financial liability of the State's taxpayers to remediate.

Concerning the treatment ponds in question and the issue of whether or not the ponds contain Coal Combustion Residual (CCR). I would like to support one or more of the comments about the definition of "deminimus" (too little to count) in the regulations cited by the expert witnesses. I would also like to request transparency on this issue. I would also like to point out that several years during my tenure I am aware that SIPC has not exceeded the allowable limits on the NPDES permit discharges. The fact that SIPC has several settling ponds to polish or clean up water from site surface runoff and rinsing and cleaning water activities might be over kill, but the results speak for themselves. Some of these ponds actually appear to me to be acting as created wetlands allowing nature to assist biologically to remediate clean up and safeguard against contamination of the public waters in the Saline creek.

SIPC staff are presently in preliminary discussions with a couple companies about new ventures to repurpose the present-day production of CCR and also the possibility of using all of the landfill CCR to make what the industries have termed "Green Cement". As we understand, numerous contractors are very interested in this proposed product to improve their environmental footprint. Does this proposal have merits? We don't know but if it does have merits, this could be big for the possible cleaning up of many of the numerous legacy coal power plant CCB sites in Illinois.

As I sat in the audience and listened to the public comments and proceedings arranged by the IPCB, and considered the amount of time and resources dedicated to this situation, it occurred to me that this process has developed into a very counter-productive set of proceedings that might have taken a very different path if there had been meaningful interaction between SIPC and the IEPA. In my former career of working for the Rural Development with Villages on their water treatment and sewer treatment facilities that were encountering difficulties complying with the regulations, I found that IEPA personnel at that time were considered as allies to those villages and consultants that realized they had a problem and was willing to seek out commonsense solutions. Might this still be the case with our IEPA?

Being on the board representing Tri county Electric Cooperative for SIPC, I don't consider SIPC to be a bad actor, to the contrary I think SIPC has always had the community's best interest in mind. For decades now SIPC has provided meaningful opportunities for employment, provided 60,000 plus rural residents with reliable, reasonably priced electricity, paid substantial real estate and other taxes to Williamson county, provided a supply of raw lake water for Lake of Egypt Water District, supported the local fire department and allowed rural residents to construct lake side residences and recreational opportunities on a private lake constructed by SIPC to support the power plant. All of these benefits in a portion of Illinois that has the poorest counties and communities. In this part of the State the economy is based in three major industries, Agriculture, Coal, and Crude Oil. Might we work together to achieve best possible outcomes?

Thank you for allowing the opportunity for everyone, proponents and opponents, to make comments regarding this issue. I truly believe that the SIPC of my experience provides a valuable service for this community with a keen awareness for environmental stewardship.

Please exclude those ponds on the SIPC premises that have been demonstrated to have "too little to count" amounts of CCR material.