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STATE OF ILLINOIS
Pollution Control Board

Dorothy Gunn, Clerk
Illinois Pollution Control Board
100 W. Randolph, Suite 11-500
Chicago, Illinois 60601

R01-10
J.C. # 14

Ms. Gunn,

I am writing to comment on the matter of the Natural Gas-Fired, Peak-Load Electrical Power Generating Facilities, and Docket Number R01-10. On July 6th, 2000 Governor Ryan requested the Illinois Pollution Control Board to conduct inquiry hearings, and provide the Governor the Board's findings of the Board's deliberations. I would like to comment, as an individual citizen, to the Governor's questions.

1. Do peaker plants need to be regulated more strictly than Illinois' current air quality statutes and regulations provide? The simple answer to this question is yes. It is my understanding that at the present time the State of Illinois has received applications to approve over 60 different peaker plant proposals, a majority of those in the Chicago Metropolitan area. As you know the State of Illinois needs to develop a NOx SIP plan, and the accumulative impact of these plants needs to be considered on the air quality of the Chicago metropolitan area, and this can not be accomplished by look at permits one at a time. In addition the Chicago area is an ozone non-attainment area, and this also needs to be considered.
2. Do peaker plants pose a unique threat, or a greater threat than other types of State-regulated facilities, with respect to air pollution, noise pollution, or groundwater or surface water pollution? With respect to groundwater I believe the answer is clearly, yes. Depending on the type of peaker plant, groundwater can be a major issue. In my township, Big Rock, a Peaker Power Plant is proposed that would use groundwater as its' source of water. Big Rock Township does not have any public water supplies and all residents depend on groundwater. It seems to me that in those circumstances extraordinary care should be

made in permitting this use, and also extraordinary public information should be available to residents, and landowners.

3. Should new or expanding peaker plants be subject to siting requirements beyond applicable local zoning requirements? In my opinion the simple answer to this should be yes. The Peaker Plant proposed for Big Rock Township would be located right in the middle of what is now agricultural land, and is inconsistent with the Kane County 2020 plan. It seems to me that long range benefits would accrue to the residents of the State of Illinois if the State had a policy preferring brownfield sites for Peaker Plants, over using prime Illinois agricultural land. We have many brownfield sites that would benefit from the location of these plants.
4. If the Board determines that peaker plants should be more strictly regulated or restricted, should additional regulations or restrictions apply to currently permitted facilities or only to new facilities and expansions? In order to achieve the best results for all citizens of Illinois and continue to improve the State's air quality, especially in East St. Louis and the Chicago area these regulations and restrictions should apply to all facilities, old and new.
5. How do other states regulate or restrict peaker plants? I am sure that your work will find that many other states have more requirements in this regard than does Illinois.

Finally, I would ask the Illinois Pollution Control Board to place a moratorium on air permits until at least the accumulative effects of these plans on the NOx SIP call is completed, understanding the ozone implications, and perhaps most importantly the effect on the State's Groundwater resources.

Thank you, for the opportunity to comment

Amy Snyder

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(Lifelong resident within 1 mile of proposed site)