

Paul R. King
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August 7, 2012

PC# 2195

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AUG 10 2012

STATE OF ILLINOIS
Pollution Control Board

Members of the Illinois Pollution Control Board
C/O Mr. John Therriault, Assistant Clerk
Illinois Pollution Control Board
100 W. Randolph Street, STE 11-500
Chicago, IL 60601-3218

Re: Variance, Docket No. PCB 2012-126

Dear Mr. Therriault:

My name is Paul R. King and I would like to add to my comments in the public meeting held on Aug. 1, 2012. I am the system owner of the Flue Gas Conditioning systems at the Ameren D.E. Edwards Energy Center in Bartonville, IL. As I sat through the hearing, listening to the opposition (primarily from upstate Chicago, Illinois), I continued to hear statements to the effect that Ameren could not be trusted, that Ameren did not live up to their past agreements, that Ameren has failed to adopt mercury or NOX controls and that Ameren is a very bad environmental steward.

As I stated before, I am the System Owner of the Flue Gas Conditioning systems at the Edwards Energy Center and would like to make a few comments pertaining to NOX and Mercury removal. Just this spring 2012, we replaced the upper layer of catalyst in our SCR as well as a complete inspection of the ammonia system feeding the SCR. These capital and O&M expenditures, in excess of one million dollars, were made to improve our NOX reduction. As it was, our SCR was ranked 17th in the nation in 2009, 24th in 2010 and up to 12th in 2011 with an average NOX rate of 0.049 lb./MM-BTU. We at the Edward's Energy Center are proud of our achievements in NOX removal.

As for Mercury, in 2008 Ameren purchased six (6) Activated Carbon Injection (ACI) systems for the sole purpose of meeting the Illinois mercury rules for the plants that did not have scrubbers. These systems were located one (1) at Meredosia, two (2) at Newton and three (3) at the Edward's Energy Center. I was responsible for overseeing the installation of these three (3) silos at Edward's which installation started at the end of 2008 and was completed and commissioned in time for compliance with the Illinois July 1, 2009 mercury compliance requirements. Several millions of capital dollars were spent for Ameren to comply with this standard. Since July 1, 2009 we have injected, at the Edward plant, over 18.8 million pounds of sorbent injection (ACI) thru July 31, 2012. This is an O&M cost of about \$18,800,000. The Edwards plant spends about another \$500,000 and a lot of man hours to keep these three (3) silos in compliance. They have turned out to be a high maintenance system. But we at Edwards can be proud of how well we have kept these systems in compliance with the current Illinois mercury rules.

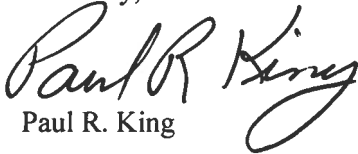
We as a plant take great strides to meet or exceed all of our environmental requirements. Ameren Energy Resources (AER) has filed an application for Variance, Docket no. PCB 2012-126 from the SO2 requirements effective Jan. 1, 2015, requesting more time to in order to make the necessary capital expenditures to achieve the 2015 and 2017 limits. AER has had some rough

times lately with the accumulation of several factors colliding including a warmer than normal winter, a nationwide economic down turn lasting more than four years, a large amount of natural gas availability, due to shale fracturing, driving down the price of natural gas, all of which has kept the price we can sell our power for at an all time low. One or two of these factors may have been foreseeable but not all of them coming together at one time.

AER is only asking for this variance to give it more time to collect the additional funding necessary to complete the Newton scrubbers in order to meet the SO2 fleet reduction. We are not asking to be exempted from the rules, we are just asking for more time to achieve the common goal. This variance is being requested to protect the communities in which we operate. If a variance is not approved and any of the Energy Centers have to close the cost to the outstate area of Illinois will be huge. The local tax base for county and schools will be hard hit along with the possible addition of unemployed workers from the plant(s) and support industries adding to the state's greater than 8% unemployment numbers.

As is said in my public statement, I moved down here from the county of Tuscola, Michigan for a job during a time when a large number of industries in Tuscola, Sanilac and Huron counties were closing and the unemployment rate was in excess of 20% in those three counties. I left at a time when the Michigan overall unemployment rate was reaching for 10%. It is devastating for the communities left behind when their major source of jobs and taxes vanish. It can have a far reaching impact, even at the state level. Due to the loss of jobs and people having to move from Michigan to find work the state lost 45,000 people since the census of 2000. As a result, Michigan lost a seat in Congress and some of its clout in Washington. This will also reduce the state's share of funding for federal programs such as highway construction, education and health care. Because I have already lived through the reality of hard economic times caused by the exodus of jobs in one state, I respectfully urge the Illinois Pollution Control Board to grant AER the requested variance so we can continue to power tomorrow's future.

Sincerely,


Paul R. King