

ILLINOIS POLLUTION CONTROL BOARD  
September 11, 1986

IN THE MATTER OF: )  
 )  
SITE-SPECIFIC RULEMAKING ) R85-7  
FOR CENTRAL ILLINOIS LIGHT )  
COMPANY. )

CONCURRING OPINION (by J. D. Dumelle):

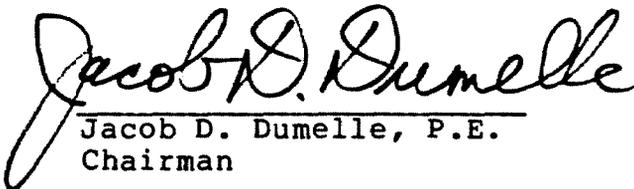
This proceeding revolves around the non-compliance of the CILCO ash pond effluent as compared to other power plant ash ponds. There does not appear to be any measurable environmental effect (R. 64). In fact, the existing effluent is far cleaner than the turbid Illinois River at the discharge point (R. 65). On a total suspended solids basis, the River averages 80 mg/l compared to the ash pond's 17 mg/l (R. 38 and Ex. 3).

I would suggest that CILCO collect data on the amount of colloidal substances in the incoming and outgoing river water (R. 76-77). CILCO should also determine if algicide application would be practicable. Under the "background" portion of the Board's rules a credit would be allowed for the suspended solids proven to be from the river. Perhaps this credit alone would achieve compliance.

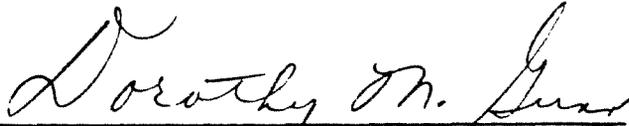
The water quality of the Illinois River at the Edwards Station is being "enhanced" by the ash pond effluent since that effluent is only 21% as turbid as the River. Is it worth \$14,000,000 of Central Illinois ratepayers funds to further enhance the River's water quality? How can this ash pond be distinguished from all other ash ponds in Illinois if this exception were to be granted? These are the key questions which need to be answered.

Finally, a topic not discussed by anyone in this proceeding is the possible use of tube settlers to aid in the removal of the suspended solids. Would they improve the ash pond's settling efficiency and, if so, at what cost?

If the information needs mentioned above are filled then I would be amenable to re-evaluating this proposal.

  
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Jacob D. Dumelle, P.E.  
Chairman

I, Dorothy M. Gunn, Clerk of the Illinois Pollution Control Board, hereby certify that the ~~above~~ Concurring Opinion was filed on the 15<sup>th</sup> day of September 1986.

  
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Dorothy M. Gunn, Clerk  
Illinois Pollution Control Board