

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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2
3 IN THE MATTER OF:)
4)
5 PROPOSED EXTENSION OF ADJUSTED STANDARD) AS 2007-2
6 APPLICABLE TO ILLINOIS-AMERICAN) (Adjusted Standard)
7 WATER COMPANY'S ALTON PUBLIC WATER)
8 SUPPLY FACILITY DISCHARGE)
9 TO THE MISSISSIPPI RIVER)
10 UNDER 35 ILL. ADM. CODE 304.124 AND 304.106)
11
12

TESTIMONY OF PAUL KECK

WITNESS IDENTIFICATION AND BACKGROUND

Q. Please state your name and business address:

A. My name is Paul Keck. I work at the Alton plant of Illinois-American Water Company at 4436 Industrial Drive in Alton, Illinois 62002.

Q. What are your job title and your job responsibilities?

A. Since 2004, I have been employed by Illinois-American Water in the Environment Management & Compliance group as a Water Quality Supervisor for Southern Illinois with primary responsibilities overseeing the Alton District and the Cairo District. My primary role is to give treatment guidance at these facilities and ensure compliance to state and federal regulations for drinking water and other regulations which are part of the water treatment process.

Q. What is your educational background?

A. I earned a BA degree in Chemistry from Southern Illinois University at Edwardsville with supporting courses in Environmental Science and Technology. I hold class "A" drinking Water licenses in Illinois and Missouri.

Q. What is your business background?

1 A. I have 25 years of experience in laboratory water analysis, water treatment, and
2 regulatory compliance. From 2000 to 2004 with American Water, I held the position of
3 Water Quality Superintendent of the Missouri-American Central Plant in Chesterfield,
4 Missouri and then transitioned to Water Superintendent of all American Water
5 Company's facilities in Eastern Missouri. In the 18 prior years, I was a Chemist and a
6 Laboratory Supervisor with St. Louis County Water Company.

7 **PURPOSE OF TESTIMONY**
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9 **Q. What is the purpose of your testimony in this proceeding:**

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11 A. The purpose of my testimony is to: (1) explain my role as Illinois-American Water's
12 representative to the Piasa Creek Watershed Project; (2) verify Illinois-American Water's
13 answers to questions 1a, 1b, 1e and 2c posed by the Board to Illinois-American Water.

14 **Q. Describe your role as a representative of Illinois-American Water in monitoring the**
15 **activities at the Piasa Creek Watershed Project.**

16 A. In September, 2004, when I was assigned to my present position, I started coordinating
17 the sampling and reporting of monthly grab NPDES discharge samples at the Alton plant.
18 At about the same time, but possibly a few months later, I became aware of the unique
19 permitting conditions set forth in the Alton NPDES Permit which were limited to the
20 adjusted standard in AS 99-6. In early 2005, I participated in the preparation and
21 submittal of documents to IEPA for the routine five year NPDES renewal which was to
22 expire January, 2006. During this time I became aware of the sunset clause in AS 99-6
23 which required IEPA to evaluate PCWP's effectiveness in sediment erosion reduction
24 towards the ten year 2:1 reduction goal. I participated in a series of meetings were held
25 with Great Rivers Land Trust ("GRLT") and Illinois-American Water to be updated on

1 the Piasa Creek Watershed Project ("PCWP") and its progress toward the ten year 2:1
2 goal. This included presentations by GRLT examinations of previously accumulated
3 quarterly and annual reports. Two tours of PCWP projects were held and numerous
4 projects were visited in various stages of completion.

5 **Q. Were you Illinois-American's primary liaison with GRLT?**

6 A. Not initially. But I became the primary liaison in late 2004.

7 **Q. What conclusions, if any, did you draw regarding the effectiveness of the soil savings
8 projects?**

9 A. I was confident that the projects were achieving their intended results. Alley Ringhausen,
10 who manages the PCWP, uses calculation methods developed by the United States
11 Department of Agriculture. I have personally visited some of the projects. The sites I
12 have observed showed obvious improvements and the logical evolutions to erosion
13 reductions. Boy Scout Lake, one of GRLT largest projects, was viewed on three
14 occasions, the last being a celebratory dinner involving various stakeholders from
15 government and the community, the Boy Scout Council, engineering designers and
16 contractors. In my opinion, this project is an excellent model of how the PCWP not only
17 produced an environmental benefit but social and community benefits. A silted in, non-
18 usable lake was revived and re-engineered to last at least 100 hundred years for not only
19 local youth, but regional youth for water education activities.

20 **Q. Did you provide reports to Illinois EPA on the progress of the PCWP?**

21 A. Personally, no. We relied on Alley Ringhausen to provide progress reports. He sent
22 quarterly and annual reports to me and IEPA's Scott Tomkins. I provided information to
23 Scott, too, but it was different from Alley's reports.

1 **Q. What did you provide to Mr. Tomkins?**

2 A. I sent him summaries of the plant's monthly required NPDES sampling data. This was
3 our data on TSS and total iron in the plant's effluent.

4 **Q. Why did you send those summaries to Mr. Tomkins?**

5 A. I thought the Agency needed it to determine the effectiveness of the offset project.

6 **Q. How could data from the plant be used to gauge effectiveness of the offset project?**

7 A. It collaborated our discharge mass. GRLT's quarterly and annual reports covered soil
8 savings, and the plant's discharge monitoring results covered TSS loading.

9 **VERIFYING CERTAIN ANSWERS OF ILLINOIS-AMERICAN WATER TO**
10 **QUESTIONS POSED BY HEARING OFFICER WEBB IN HER ORDER OF AUGUST 6,**

11 **2007**

12 **Q. Did you participate in the preparation of Illinois-American Water's answers to the**
13 **questions presented in Hearing Officer Webb's Order of August 6, 2007?**

14 A. Yes.

15 **Q. What was your role in the preparation of the Company's answers?**

16 A. I read the questions in Hearing Officer Webb's Order and participated in a meeting with
17 other Company representatives and counsel to discuss those questions and answers. I
18 helped formulate the Company's answers to questions 1a, 1b, 1e and 2c.

19 **Q. I will ask you now to verify, Mr. Keck, that the answers attributed to you for**
20 **questions 1a, 1b, 1e and 2c are true can correct to the best of your knowledge,**
21 **information and belief.**

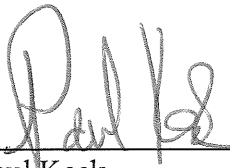
22 A. Yes they are.

1 **Q. Did you provide input in behalf of Illinois-American Water to any other answers in**
2 **the Company's response to Hearing Officer Webb's questions?**

3 A. Yes. I also supplied an Affidavit which is attached the Company's Amended Petition.
4 My Affidavit explained a formula used for calculating the TSS in the Alton plant's
5 effluent. My Affidavit was referred to in Illinois-American Water's answer to question
6 5b posed to the Agency.

7 **Q. I know that your Affidavit was signed under oath, but let me ask you now if the**
8 **information contained in that affidavit is true and correct to the best of your**
9 **knowledge, information and belief.**

10 A. Yes, it is.

11 
12 _____
Paul Keck

STATE OF ILLINOIS)
)
COUNTY OF MADISON)

AFFIDAVIT

I, Paul Keck, after being duly sworn on oath, state that the foregoing Testimony is true and correct to the best of my knowledge and belief.

FURTHER AFFIANT SAYETH NOT.



Paul Keck

SUBSCRIBED AND SWORN to
before me this 23 day
of August, 2007



NOTARY PUBLIC

