Ex 6

CLEAN AIR - A PUBLIC INTEREST

My name is Barbara Bollmann. Since my husband, Lloyd Klinedinst, has already described our family and residential ties to the community, I will not do that here. Over the past four years I have followed the growing concern of area residents regarding the greatly expanded plans of Ameren to build a coal ash dump in the flood plain of the Missouri River at Labadie. I have attended nearly all of the hearings with various boards and our own Commissioners. The more I have learned, the more I am convinced that this corporation never acts in the public interest. They seem rather to stage end-runs around the law time after time while using their considerable political and financial clout to pressure anyone who might just want to hold them to an ethical standard.

The grave risk posed to our waterways by the sequestering of coal ash in a flood plain has been a central concern. But more recently I have become aware of a threat of equal danger to the health of the community. That is the presence of sulfur dioxide (SO2), another of the dangerous byproducts of coal ash, carried across the area as airborne particulate. One article that got my attention was the June 28, 2012 article in the St. Louis Post Dispatch showing a model of the

1

dispersal plume of SO2 from the Labadie plant. Our home is in that impact zone. Sulfur dioxide has been directly linked to asthma, COPD, cardio-vascular disease, stroke, birth defects, pre-mature births and death for vulnerable populations. The plume zone includes communities up to 12 miles from the plant: Washington, Villa Ridge, Pacific, St. Albans, Wildwood. Within 2 to 4 miles are several elementary schools: Labadie, St. Albans, Colman. There is also a Girl Scout Camp at Cedarledge where children are out of doors all day long, exposed to this dangerous airborne agent. These children are put at risk of exposure to extremely high concentrations of SO2 during critical 5-minute bursts that might occur during start-up, shut-downs or any of an array of emergency operations. An important source of information for me is a document, dated February 8, 2010, prepared by the American Lung Assoc., the Environmental Defense Fund, the Natural Resources Defense Council and the Sierra Club. It is titled Comments on the US Environmental Protection Agency's Proposed Revisions to the Ambient Air Quality Standards of Sulfur Dioxide. (74 Fed. Reg. 64810 Dec. 8, 2009; Docket ID#EPA-HQ-OAR-2007-0352). We need up-to-date air quality standards, informed by up-to-date science, not the standards and science of 1971. And they need to be vigorously enforced.

2

That information led me to this most recent document which I want to submit now. It is dated February 6, 2013 and is titled Next Steps for Area Designations and Implementation of the Sulfur Dioxide National Ambient Air Quality Standard. This document describes the EPA's updated strategy for completing initial area designations under the June 2010 1-hour primary sulfur dioxide (SO2) NAAQS. On page three of that document, under the subheading "Thresholds" for Sources Subject to the Program it states:

> In the May-June 2012 stakeholder meetings, EPA presented information indicating that there are 20,000+ SO_2 sources nationally, but that based on 2008 emissions data, a much smaller number - about 480 sources with actual emissions exceeding 2800 tons per year - account for 90% of national SO_2 emissions. A number of stakeholders commented that, given constraints on resources for characterizing air quality through either monitoring or modeling, focusing on the largest sources of emissions (*e.g.*, those

included by the "90%" threshold) is a reasonable principle for prioritizing which sources should be evaluated for purposes of assessing attainment of the 1-hour SO_2 NAAQS. Using more recent 2011 emissions data for electric generating units and 2008 data for non-EGUs, we now estimate that about 540 sources, each emitting over 1900 tons of SO_2 per year, account for 90% of national SO_2 emissions.

One important monitoring objective for a NAAQS with localized impacts (such as SO_2 or lead) is to characterize air quality near the largest emitters of the pollutant.

At the present time we have no monitors in the state of Missouri to measure the emissions of this lethal pollutant. We must rely on models like the one in the Post-Dispatch and on findings of agencies in neighboring states which are monitoring similar facilities. The plant in Labadie is one of the largest coal burning electric generating facilities in the US. Even if this plant is closed in the not so distant future, we are going to be left

with a dangerous mess that will in short order become the burden of the state and tax payers to keep sealed for ever. They have yet to prove that they can safely sequester what is already there threatening the region. To me, this request is clearly not in the public interest. We are relying on you. Thank you.

5