

Janet D. Hirsch

Testimony for PSC Hearing

June 25, 2013

Ex T  
Union, MO

Hi, My name is Janet Ditttrich. I have been a resident of Labadie for the past 18 years, and have been teaching science at the Fulton School in St. Albans, MO. I am one of the founding members of the Labadie Environmental Organization. When LEO first formed, ~~the~~ the Science Committee, a group of local people with a particular interest, profession, or expertise in the sciences, and we meet regularly to investigate, research, and educate ourselves about this proposed coal ash landfill.

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Ironically, my father, William Becque, was the Executive Director of the American Lung Association back in the 60's and 70's. And I remember he was regularly called upon to testify in cases involving the health problems caused by the air pollution of coal-fired power plants. His voice contributed to the landmark Clean Air Act of 1970.

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Therefore, I became most interested in learning about air quality and how the proposed coal ash landfill will harm the air quality in Franklin County, which is the issue I will address tonight.

First, the operation of the landfill in itself can create air pollution. As is typical of coal ash landfills, Ameren is proposing a dry, rather than wet handling of its ash. The Federal Environmental Protection Agency website has over 4,000 articles on coal ash, but I'm going refer to only one major study from 2010 regarding some of the air pollution impacts of exactly this sort of coal ash landfill. According to the EPA:

"When dry handled, coal combustion wastes will be emitted into the air by loading, transport, unloading, and wind erosion. Once in the air, it will likely migrate off-site as fugitive dust. As a result, workers and nearby residents could be exposed to significant amounts of coarse particulate matter (PM10) and fine particulate matter (PM2.5)." 1.

Here are some pictures from the EPA's report of what this fugitive dust looks like:  
(Reference photos at p.5 of EPA's May 2010 report)

This sort of air pollution is a lot more than an eyesore, as shown by these pictures. The air pollution associated with coal ash landfills, particularly fine particulate matter (PM2.5) pollution, is especially harmful to human health. In order to protect human health the EPA has set national standards for fine particulate pollution. The EPA summarizes the health threats posed by fine particulate pollution as follows:

" When breathed in, these particles can reach the deepest regions of the lungs. Scientific studies have found an association between exposure to particulate matter and significant health problems, including: aggravated asthma, chronic bronchitis ,

1. Inhalation of Fugitive Dust: A screening Assessment of the Risks Posed by Coal Combustion Waste Landfills. EPA, Office of Solid Waste and Emergency Response. May 2010.
2. Environmental Protection Agency. Particulate Matter-Health and Environment. [http:// www.epa.gov/air/particlepollution/health.html](http://www.epa.gov/air/particlepollution/health.html).
3. <http://www.epa.gov/oar/particlepollution/pdfs/20060921-factsheet.pdf>
4. [http://www.wnvironmentalintegrity.org/news/documents/EIP\\_Top50USPowerplants\\_Mercury\\_Emitters2012.FINAL042910.pdf](http://www.wnvironmentalintegrity.org/news/documents/EIP_Top50USPowerplants_Mercury_Emitters2012.FINAL042910.pdf).
5. <http://www.mwcog.org/uploads/committee-documents/YI5XVldd20110309153605.pdf>
6. <http://www.epa.gov/airquality/greenbk/qncty.html>

emphysema, lung cancer, irregular heartbeat, heart attack, congestive heart disease, and stroke." 2.

So breathing the fugitive dust that will be stirred up by the process of running a coal ash dump is clearly not in the public interest.

In the course of our research I went on to learn more about the current effect of emissions from the Labadie plant on the air quality of Franklin County. You see when I first moved to Labadie, I knew coal plants **used** to pollute the air but I **naively** thought the Labadie plant had to comply with all of the air pollution controls that had been set by the Clean Air Act and its revisions through out the years since my father's work. I thought the white clouds coming from the stacks was just steam.

So, I was **shocked** to learn that Franklin County currently does not meet the National Air Quality Standards for fine particulate matter. And Ameren's Labadie Plant is the top polluter of fine particulate matter in Franklin Co. (3.) emitting significant amounts of fine and coarse particulate pollution, as well as enormous amounts of sulfur dioxide, which also contributes to fine particulate pollution in the air. On top of all of this, the Labadie plant has the 3rd highest mercury emissions of all US power plants with 1,442 pounds of mercury emitted in 2008 alone. 4.

I was **further** shocked and deeply concerned to learn that Ameren currently violates the Clean Air Act and has been in violation since at least **2001**. The US Environmental Protection Agency issued a Notice of Violation to Ameren in January 2012 for all four of its coal plants in Missouri-including Labadie. Apparently, all four plants in Missouri undertook major upgrades without permits and without installing the pollution controls necessary to comply with the Clean Air Act. The EPA claims that since 2001, the plant has been emitting illegally high levels of pollutants harmful to human health, including coarse particulate matter, fine particulate matter, sulfur dioxide, nitrogen dioxide, and pollutants contributing to ozone. ~~I mention~~ These facts just to emphasize the fragile state of air quality in Franklin County. Remember, we do not meet the National Air Quality Standards due to AMeren's current violations and neglect of responsibility to our county. So, watching them try to push through a coal ash landfill that will only increase the particulate matter through the fugitive dust from its operation can only increase the health risks previously mentioned to the Franklin County residents. AND this enormous effort by AMeren to push this coal ash dump through when the EPA is on the verge of regulating coal ash waste as a toxic substance is just one more indication of how Ameren is not considering the public health nor the environment

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2. Environmental Protection Agency. Particulate Matter-Health and Environment. [http:// www.epa.gov/air/particlepollution/health.html](http://www.epa.gov/air/particlepollution/health.html).
3. <http://www.epa.gov/oar/particlepollution/pdfs/20060921-factsheet.pdf>
4. [http://www.wnvironmentalintegrity.org/news/documents/EIP\\_Top50USPowerplants Mercury Emitters2012.FINAL042910.pdf](http://www.wnvironmentalintegrity.org/news/documents/EIP_Top50USPowerplants_Mercury_Emitters2012.FINAL042910.pdf).
5. <http://www.mwco.org/uploads/committee-documents/YI5XVldd20110309153605.pdf>
6. <http://www.epa.gov/airquality/greenbk/gncty.html>

in the least. These violations opened my eyes and deeply concern me about the kind of company Ameren is.

Is Ameren prepared to cover the health care costs of the residents of Franklin County? They haven't up to this point? Can we trust them to comply with regulatory standards? They haven't up to this point. In the face of all the planning and zoning hearings, the testimonies of experts in the scientific field as well as concerned residents, it seems to me they continue to place their profit margin over the health and welfare of this community as well as all those downstream. A landfill of this nature belongs in an area where people do not live and in soil that is clay based, not in a flood plain in our precious farmland!

My father was an optimistic believer in the good of people and our industries as well as in democracy and the power of an individual's voice in this great nation. I think he would be shocked to see the seemingly complete disregard for the federal laws he worked so hard to create by companies like Ameren. He worked hard to make coal clean and safe for our nation....40 years ago. My son is in the audience tonight, and I'd hate to have him 40 years from now look back and say, if only they hadn't built that coal ash landfill in the Missouri River Flood plain.....I know my mom spoke up against it.

This an opportunity for AMeren to literally clean up their act and prove itself true propionates of their slogan "Clean Energy" through their actions as much as their words. I hope that this Public Service Commission will truly consider the public health, the internal cost of coal to the people and the environment, and the future of "clean coal" when you make your decision.

Thank you,

Janet Dittrich  
June 25, 2013

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3. <http://www.epa.gov/oar/particlepollution/pdfs/20060921-factsheet.pdf>
4. [http://www.wnvironmentalintegrity.org/news/documents/EIP\\_Top50USPowerplans Mercury Emitters2012.FINAL042910.pdf](http://www.wnvironmentalintegrity.org/news/documents/EIP_Top50USPowerplans_Mercury_Emitters2012.FINAL042910.pdf).
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4. [http://www.wnvironmentalintegrity.org/news/documents/EIP Top50USPowerplans Mercury Emitters2012.FINAL042910.pdf](http://www.wnvironmentalintegrity.org/news/documents/EIP_Top50USPowerplants_MercuryEmitters2012.FINAL042910.pdf).
5. <http://www.mwcog.org/uploads/committee-documents/YI5XVldd20110309153605.pdf>
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