



Protect the Middle Fork

TALKING POINTS

Illinois EPA Public Hearing

March 26, 2019, 6:00 PM

Danville Area Community College Gymnasium
2000 East Main Street, Danville, IL

Dynegy Midwest Generation has applied to the Illinois EPA for Section 401 Water Quality Certification for impacts associated with a massive riverbank stabilization project on the Middle Fork of the Vermilion River. If approved:

- Over 22,000 cubic yards of rip-rap and other fill would be placed along 2,000 linear feet of the river.
- Fill would extend over 30 feet into the river channel.
- Construction would require digging up to 8 feet into the riverbed,
- Soils contaminated with coal ash chemicals would be excavated, potentially sending pollutants downstream.
- The river would either be closed to paddlers during construction or paddlers would be required to portage over 1/3 mile around the construction site.

This massive project will harm the river and is intended to allow the coal ash to be permanently left in place, leaking into the river. Dynegy's project will forever leave a visual scar on the otherwise natural river corridor; degrade water quality; and have devastating economic consequences for the operator of the canoe and kayak livery in Kickapoo State Park.

Your attendance at the public hearing is important! The following points can be used to provide oral or written comments on the proposal.

Water Quality

The project has a high probability of disturbing and re-suspending contaminated soils and sediments into the river. This could degrade water quality and redistribute coal ash chemicals downstream where they may be ingested by fish and other aquatic biota, or come in contact with recreational users of the river.

Orange sediments regularly pool and settle in the river channel next to the Old East Ash Pit. Samples of leachate taken from groundwater seeps from riverbanks in this section by Illinois EPA personnel in 2008 were determined to contain coal ash chemicals.

In 2016 and again in 2017, water quality testing of these seeps by a certified, independent laboratory showed the presence of arsenic, barium, boron, chromium, manganese, molybdenum and sulfate, all of which exceeded background levels.

Dynegy proposes to install a temporary turbidity curtain to limit the downstream transport of sediments. Silt or turbidity curtains are highly susceptible to changing water levels and turbulent currents, exactly the conditions that will be encountered in the Middle Fork. High flows resulting from storm events during construction could send contaminated material downstream. However, the Illinois EPA says that increases in sediment loads during construction will not impact existing uses of the river.



Protect the Middle Fork

Recreational Use

The Middle Fork is the centerpiece of a major recreation area in east-central Illinois. Each year thousands of people come from across the state to take part in river-oriented activities such as kayaking, canoeing, tubing, wading, fishing, birding and hiking.

The proposed project would require in-stream construction on over a 1/3 mile of the river, and take place over nine months or more. Heavy equipment would operate directly in the river, and the construction zone would extend up to 70 feet into the channel. This would inhibit or prevent recreational use of the river for significant periods of time, particularly since construction would take place when water levels are low, which generally coincides with prime recreational months.

The prospect of large-scale construction and the dispersal of additional pollution into the river may dissuade future users from coming to the Middle Fork. Kayakers and canoeists encountering a lengthy, unpleasant and perhaps intimidating experience of 2,000 feet of in-stream construction may choose never to return to the Middle Fork. The majority of people patronizing Kickapoo. Expecting families and amateur paddlers to portage more than 2,000 feet around a construction zone is unrealistic, and will severely limit the number of people willing to use the river. This could result in significant economic impacts to Kickapoo Adventures.

Those who do continue to use the river for canoeing and kayaking would encounter navigational challenges and potential safety issues as they pass the 2,000-foot construction zone. Given the configuration of the river, currents may move boaters toward the outer bend of the stream, placing them dangerously close to the construction zone. Silt curtains installed in mid-channel to contain sediments re-suspended by construction would constitute an additional safety hazard for boaters swept toward the outer bank.

Section 401 Limitations

By statute, the Section 401 certification process and this hearing is narrowly focused on whether the proposed bank stabilization will cause violations of surface water quality standards or interfere with existing water uses, particularly public recreation. But the Public Notice acknowledges that the purpose of Dynegy's project is to protect the existing coal ash pits from the erosional forces of the naturally meandering river. Shouldn't the hearing be expanded to address the closure plan and alternatives under consideration?

If the Illinois EPA ultimately determines that the coal ash must be moved away from the river, only more targeted and temporary bank stabilization would be required. **The Illinois EPA should not prematurely approve a project that would harm the quality and use of the river.**

Written Comments

Written comments will be accepted by the Illinois EPA through April 25, 2019 and should be sent to:

Hearing Officer Dean Studer
Midwest Generation 401
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, IL 62794-9276

Email comments can be sent to: epa.publichearingcom@illinois.gov and must specify Dynegy Midwest Generation 401 or COE 2018-602.