



The Large Public Power Council

300 North Washington St., #405, Alexandria, VA 22314 • 703/740-1750 (phone) • 703/740-1770 (fax) • www.lppc.org

November 9, 2011

The Honorable John Hoeven
United States Senate
120 Russell Senate Office Building
Washington, DC 20510

The Honorable Mary Landrieu
United States Senate
431 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Mike Enzi
United States Senate
379A Senate Russell Office Building
Washington, DC 20510

The Honorable Joe Manchin, III
United States Senate
303 Hart Senate Office Building
Washington, DC 20510

The Honorable Rob Portman
United States Senate
338 Russell Senate Office Building
Washington, DC 20510

The Honorable Ben Nelson
United States Senate
720 Hart Senate Office Building
Washington, DC 20510

The Honorable John Thune
United States Senate
511 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Kent Conrad
United States Senate
530 Hart Senate Office Building
Washington, DC 20510

The Honorable John Boozman
United States Senate
320 Hart Senate Office Building
Washington, DC 20510

The Honorable John Rockefeller, IV
United States Senate
531 Hart Senate Office Building
Washington, DC 20510

Dear Senators:

I am writing on behalf of the Large Public Power Council (LPPC) to voice our support for S.1751, the **Coal Residuals Reuse and Management Act**. We are grateful for your leadership in sponsoring this common-sense bipartisan legislation.

The Large Public Power Council represents 25 of the largest locally owned and operated not-for-profit electric systems in the nation. Members are located in 11 states and Puerto Rico. LPPC member utilities supply electricity to some of the largest cities in the country -- including Los Angeles, Seattle, Omaha, Phoenix, Sacramento, Jacksonville, San Antonio, Orlando and Austin.

Collectively, our members own and operate approximately 35,000 circuit miles of transmission lines and over 86,000 megawatts of generation, reflecting a balanced portfolio of renewable energy, fossil fuel, nuclear, hydropower and other resources.

Senators Hoeven, Enzi, Poartman, Thune, Boozman,
Landrieu, Manchin, Nelson, Conrad, Rockefeller
November 9, 2011
Page Two

We have a strong interest in workable rules for the disposal of coal combustion residuals (CCR).

The members of the LPPC believe that coal combustion residuals should be regulated as a non-hazardous waste. This is in accordance with EPA's two previous final regulatory determinations that CCR *does not warrant* regulation under the Resource Conservation and Recovery Act's hazardous waste program. We believe there should be federal guidelines for the disposal of CCR and that EPA should be able to enforce the standards if a state fails to do so.

This bill achieves these goals by creating federally enforceable disposal standards with the same level of stringency as those for municipal solid waste. Importantly, by not regulating CCR as a hazardous waste, S.1751 allows the beneficial reuse of CCR to continue. Currently, about 40% of CCR in the US is directed to beneficial reuse rather than landfills or impoundments.

The members of the LPPC urge prompt passage of S.1751 by the US Senate.

Sincerely,



Jorge Carrasco
LPPC Chair