



Citizens
Against
Ruining the
Environment

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PC#1537

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Illinois Pollution Control Board
John Therriault
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WHEREAS, the coal ash storage pits at the 24 coal-fired power plants in Illinois have presented concerns from ongoing pollution and greater risks that may result from lack of structural integrity,

Over 4.4 million tons of coal ash is produced in Illinois each year and stored in wet coal ash pits at Illinois' 24 power plants. Coal ash – which contains high levels of harmful heavy metals such as arsenic, lead and selenium – is leaching into streams, rivers, lakes and groundwater throughout the state. This is a serious public health hazard and an environmental threat to nearby communities.

(<http://earthjustice.org/sites/default/files/library/references/il-coal-ash-factsheet.pdf>)

Further, only 37% of Illinois coal ash pits are lined. Coal ash contaminants have been found in groundwater near all 24 coal-fired power plant sites in Illinois.

(<http://earthjustice.org/sites/default/files/library/references/il-coal-ash-factsheet.pdf>)

Living near coal ash impoundments increases one's risk of serious medical problems, such as birth defects, neurological damage, reproductive issues, tumors and cancer. Health threats persist up to 78-105 years after the pits begin operation.

(<http://www.psr.org/assets/pdfs/coal-ash-pdf>, U.S. EPA, Human and Ecological Risk Assessment of Coal Combustion Wastes, Aug. 6, 2007, 4-8)

WHEREAS, the Illinois river system is used for wildlife viewing, hiking, paddling, angling, hunting, and photography, providing enjoyment and economic value,

Coal ash pollution not only creates issues of health and safety, but stands to impact local economies. Loss of sport fishing, hunting, and other recreation depreciates with ecosystem deterioration and the stigma of pollution. In a study of coal ash contamination at just 22

waterways, the total cost of poisoned fish and wildlife amounted to \$2.31 billion. (Letter to the Office of Management and Budget, A. Dennis Lemly, Ph.D., Research Fish Biologist USFS, S. Research Station Piedmont Aquatic Research Laboratory, Jan. 8, 2010)

WHEREAS, the river system supports a diverse range of threatened and endangered species, the loss of which would be an irreplaceable loss to local ecology and heritage,

Analysis of monetary cost of ecological damage from coal combustion waste has indicated that coal ash surface impoundments pose “unacceptably high ecological risks regardless of their location or design.” (Letter to the Office of Management and Budget, A. Dennis Lemly, Ph.D., Research Fish Biologist USFS, S. Research Station Piedmont Aquatic Research Laboratory, Jan. 8, 2010)

WHEREAS, the Illinois Environmental Protection Agency has proposed rules to the Illinois Pollution Control Board (IPCB) to address coal ash at power plant sites,

The rules seek to establish “criteria, requirements and standards for site characterization, groundwater monitoring, preventive response, corrective action and closure of surface impoundment units containing coal combustion waste or leachate from coal combustion waste at power generating facilities.” (Section 841.100 of Illinois EPA’s PROPOSED NEW 35 ILL. ADM. CODE PARTS 841 Statement of Reasons, available at <http://www.ipcb.state.il.us/documents/dsweb/Get/Document-82136>)

Upon the effective date, the rules will apply to “all surface impoundments at power generating facilities containing coal combustion waste or leachate from coal combustion waste 1) operating or 2) not operating but whose coal combustion waste or leachate from coal combustion waste causes or contributes to an exceedence of the groundwater quality standards.” (Section 841.105 of Illinois EPA’s PROPOSED NEW 35 ILL. ADM. CODE PARTS 841 Statement of Reasons, available at <http://www.ipcb.state.il.us/documents/dsweb/Get/Document-82136>)

WHEREAS, Citizens Against Ruining the Environment wishes to provide for the continued protection of public health, the environment and water resources,

WHEREAS, C.A.R.E. is dedicated to maintain the environmental integrity of not only Will County but of “Mother Earth.” C.A.R.E.’s mission is to research, educate & assist in all areas that may have detrimental effects to our health and the environment’s.

NOW, THEREFORE, BE IT RESOLVED by Citizens Against Ruining the Environment that the Illinois Pollution Control Board should consider the implementation of rules that will provide greater protection of water resources threatened by coal ash disposal sites,

This may include, but is not limited to:

- Requirement of financial assurance for every impoundment
- Requirement of closure plans for every impoundment
- Alternative assessments in correction action and closure plans
- Assessment of surface water impacts and threats to surface waters
- Require closure of impoundments causing groundwater quality standards to not be met
- Enhanced public participation [60-day public comment period]
- Continuing enforceability of groundwater quality standards
- Presumption that removal is the required closure method
- Minimum 30 years' post-closure monitoring
- Prohibition on using coal combustion waste or by-products to establish final grade/slop
- Definition of "surface impoundment" to include both "hold[ing]" and "transfer[ring]" coal combustion waste
- Prohibition on new impoundments and expansions

BE IT RESOLVED FURTHER THAT this resolution be forwarded to the State representatives of Will County, Governor Pat Quinn, the Illinois Environmental Protection Agency, the Illinois Department of Natural Resources, and the Illinois Pollution Control Board.

Regards,

Ellen Rendulich

Directors,

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