



Madison County Government
Planning and Development Department

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STATE OF ILLINOIS
Pollution Control Board

Illinois Pollution Control Board
P.O. Box 19274
Springfield, Illinois 62794-9274

Pct# 3052

Re: Comment on Proposed New 35 Ill. Adm. Code 841 – Coal Ash Ponds

R14-10

To whom it may concern:

I am writing as the department head for Madison County's Planning & Development Department. Our department includes a solid waste program for which we are the Illinois Environmental Protection Agency's delegated enforcement agency in handling solid waste issues. We also have sustainability and stormwater programs, which involve an array of clean water initiatives. Madison County is committed to clean water issues. We invest staff time and resources to advance our objectives, and we work to maintain high standards.

In regard to the rules under consideration for coal ash pond, please know that Dynegy has a coal-fired plant within Madison County that is situated on the banks of the Mississippi River. The coal ash ponds at the Dynegy Wood River plant, some of which are unlined, have accumulated more than sixty (60) years of toxins and caused documented groundwater contamination. The East Ash Pond System has been ranked as high hazard by IEPA. These ash ponds present a threat to the Mississippi River and the many downstream communities.

As you're aware coal ash spills in Tennessee and North Carolina have devastated communities, had a lasting and harmful effect on water supplies, and cost millions of dollars to clean up. I urge the IPCB to include a provision of financial assurances for each coal ash impoundment, in order to protect communities from being saddled with clean-up costs for decades to come. Financial assurance rules should require that waste generators demonstrate the resources to correct environmental damage that may be caused by their operations. Other states require financial assurance for coal ash dumps. Illinois has financial assurance requirements for operations like landfills, underground storage tanks, and used tire facilities.

Additionally, the State of Illinois needs a comprehensive and responsible closure plan for coal ash pits, a rule that is applicable to pits at both closed and active power plant sites. I urge the IPCB to require inundation zone maps, emergency action plans and closure plans to be created for every Illinois coal ash

impoundment. The Illinois Environmental Protection Agency only requires inundation maps and emergency plans to be developed for high-hazard dams. I ask that these be required for all coal ash impoundments in order to more adequately prepare and protect the public against the catastrophic impacts of a spill. I also ask for closure plans for every impoundment, including alternative assessments for final site remediation.

The IPCB should continue to consider the implementation of state coal ash rules that incorporate required elements of the Federal rule and adequately protect water resources threatened by coal ash disposal sites, including, but not limited to:

1. A shorter two-year timeline for implementation and clean-up.
2. Better consideration of potential impacts on surface waters through groundwater contamination.
3. A requirement for alternatives analysis prior to corrective action implementation
4. Full site remediation of all coal ash sites, with ash removed to a dry landfill away from water.
5. Provisions for transparency and timely public notice about any reuse of coal ash.

Thank you for the opportunity to provide input. In order to protect our communities avoid the devastating effects of coal ash spills, I ask that you consider my comments as you complete your review process. If you have questions, please feel free to call me at (618) 296-4408.

Sincerely,



Matt Brandmeyer, AICP
Planning & Development Administrator

Cc: Tom Hawkins, Deputy Administrator
Leah Dettmers, Sustainability Coordinator
Steve Brendel, Stormwater Coordinator