

The City of Granite City

Ed Hagnauer, Mayor

Lisa Bonnett Director
Illinois EPA
P.O. Box 19276
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RECEIVED
CLERK'S OFFICE

JUL - 2 2015

STATE OF ILLINOIS
Pollution Control Board

PC# 3053

Re: Coal Combustion Waste (CCW) Ash Ponds and Surface Impoundments at Power
Generating Facilities: Proposed New 35 Ill. Adm. Code 841

To whom it may concern:

R1470

I am the mayor of Granite City, a city with an industrial history located downstream from Alton, Illinois. Our neighbors in Alton have a coal fired power plant (Dynergy's Wood River Plant) that sits on the Mississippi River, which is the source of my city's drinking water.

The Wood River plant, like all coal plants, produces "Coal Combustion Residuals" also known as coal ash, a substance that the United States Environmental Protection Agency has determined is harmful to human health and the environment. Publicly available information indicates that coal ash and its toxic constituents like arsenic, lead and selenium, are leaching into streams, rivers, lakes and groundwater throughout the state of Illinois.

The coal ash ponds at the Dynergy Wood River plant, some of which are unlined, have accumulated more than sixty years of toxins and caused documented groundwater contamination. The East Ash Pond System has been ranked as high hazard by Illinois Environmental Protection Agency meaning a loss of life is likely if the pond system fails. These ash ponds present a threat to the Mississippi River, Granite City, and the many other communities downstream.

As the Illinois EPA prepares to write a rule regarding coal ash in our state, I would like to ask you to keep the people of Granite City in mind, thinking of continued protection of public health and water resources and consider these recommendations:

Require Financial Assurances: 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 IEPA 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 potential polluters to demonstrate they have the resources to correct any 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.

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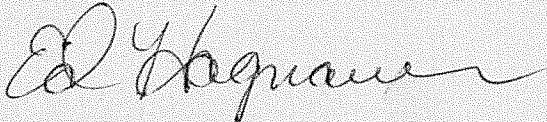
Require Better Planning: Additionally, the state of Illinois needs a comprehensive and responsible closure plan for coal ash pits, a rule that is applicable to pits at both closed and active power plant sites. I urge the IEPA to require inundation zone maps, emergency action plans and closure plans to be created for every Illinois coal ash impoundment not just high hazard dams. I ask that IEPA require these 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.

IEPA 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:

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

In recent years we have seen the devastating effects of coal ash spills and it is clear that to better protect our communities we must have a strong state plan in place. I call on you to put these rules in place safeguarding the state of Illinois and the people of Granite City.

Sincerely,



Mayor Ed Hagnauer

cc:

✓ Illinois Pollution Control Board
Senator William Haine
Representative Daniel Beiser
Senator James Claybourne