

**LESTER D. BERGSTEN PUBLIC WORKS
OPERATION & MAINTENANCE CENTER**



September 12, 2014

Mr. John Therriault
Clerk, Illinois Pollution Control Board
100 W. Randolph, Suite 11-500
Chicago, IL 60601

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SEP 19 2014

STATE OF ILLINOIS
Pollution Control Board

P<# 3024

**RE: R2014-010; PROPOSED RULES (ILL. 35. PART 841) FOR COAL COMBUSTION WASTE SURFACE
IMPOUNDMENTS AT GENERATING FACILITIES**

Mr. Therriault:

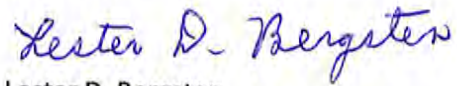
The Peoria City/County Landfill Committee (Committee) is encouraged that the Illinois Pollution Control Board (Board) is considering rules to regulate coal combustion waste surface impoundments at power generating facilities (Ill. 35, Part 841). Coal combustion residue should be managed to minimize as much as practical impacts to human health and the environment. The proposed rules in Part 841 provided a good foundation to further improve coal combustion residue management in Illinois.

The Committee encourages the Board to continue the rule making process. With the USEPA, coal combustion residue management rules are scheduled to be finalized by December 19, 2014. It will be important for Illinois to have rules in alignment with USEPA rule for the regulation on Coal Combustion Waste (CCW) that protects ground water and surface water. The Committee encourages the Board to implement regulations for coal combustion residue that are as protective to human health and the environment as the regulations that apply to municipal solid waste streams disposed of at lined landfill. The Committee recommends the Board consider rules that would allow coal combustion residue to be disposed of within the property boundaries for municipal waste landfills. The Committee recommends the Board consider allowing for a streamlined permitting process for public agencies desiring to accommodate coal combustion residue disposal in isolated engineered cells.

Public agencies have a vested interest in ensuring the residents of Illinois have waste materials disposed in a manner that protects human health and the environment. By allowing public solid waste agencies the flexibility to accept coal combustion residue, at established waste disposal facilities, limits the need for additional property to manage coal combustion residue. This would provide better public oversight of waste disposal from coal fired power plants.

The Committee encourages the Board to continue to develop the rules for coal combustion waste management; and, to consider allowing public agencies to streamline permitting to manage the wastes from coal fired plants in a responsible and transparent process.

Sincerely,



Lester D. Bergsten

Chairman, Peoria City/County Landfill Committee

C: Landfill Committee Members