

**From:** [Tom Terrien](#)  
**To:** [Brown, Don](#)  
**Subject:** [External] Public Comment regarding Coal Ash Rulemaking  
**Date:** Monday, August 10, 2020 2:36:26 PM

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Attention: Clerk of the Board, Don Brown

On behalf of the Middlefork Chapter of the Illinois Audubon Society, the oldest conservation organization in Illinois today, we offer our brief perspective to the Illinois Pollution Control Board regarding the coal ash rulemaking. Not only are we a keenly observant birding community but as a group of citizens who love all flora and fauna, we endorse the conservation measures that will best protect our natural resources and the people who enjoy them. Our situation is unique in that we are very fortunate to have Illinois's only Wild and Scenic River, the Middle Fork of the Vermilion River, flowing through our communities.

These rules are very personal for us, as there are three coal ash pits sitting along this river, leaching toxins into this beautiful recreational treasure. We have people here who participate in spring and winter bird counts. Many enjoy using the river for kayaking, canoeing, and fishing. A clean river is of great benefit to residents and non residents alike, as many people come from outside the area to enjoy the river's pristine beauty which benefits our area economically, as well. We have field trips with the Illinois Native Plant Society and the Vermilion County Conservation District in order to explore all aspects of our natural world. A coal ash pit collapse in our area would bring a terrible environmental catastrophe and a halt to all the activities mentioned above. Kickapoo State Park and many other natural areas along the river would be a toxic wasteland, in addition to all the private and commercial wells that would be poisoned. We hope that by having strong rules in place, and strict adherence and enforcement of those rules, will prevent such an occurrence from happening here or anywhere in our state of Illinois.

To that end, we believe that the following issues for consideration by the IPCB are of paramount importance, both now and for future generations. Since we cannot trust all corporations to be accountable for their actions, we need to be very clear as to what is acceptable in way of closure standards, among other things.

We strongly urge a no wet ash rule, meaning that coal ash in storage anywhere, does not get wet now or in the future. The rule should be that coal ash cannot be closed in place if it is or will remain wet. Furthermore, the clean up of ground water pollution will not be considered complete until the ash is no longer exposed to water. The coal ash pits along the Middle Fork River are unlined, too close to the river, and obviously leaching into the water. The river is eroding the bank near one of the pits and becoming a concern. To have the no wet ash rule in place would prevent companies in the future from keeping coal ash near a river and also force the removal of existing coal ash to a dryer place. The only safe and permanent preventative measure right now for the Middle Fork River is the removal of the coal ash to a dry place safely away from the river's encroachment. The no wet ash rule would ensure that energy companies could not put off their responsibility of a permanent clean up by proposing cheaper alternatives that were not mindful of future generations and safe solutions to wildlife and people.

Because federal rules can change very quickly with a stroke of the pen, Illinois needs to do better by making sure that not only are our requirements equal to the federal rules, but should

exceed them as appropriate to the situations in our state. The rules you put in place are important to the safety and well being of our citizens, the environment, our economies, and all the wildlife that dwells within our state and enhances our lives.

We trust that you will decide wisely. Thank you for your consideration.

Respectfully,

Sue Tinkle, President of Middlefork Audubon, a chapter of IAS

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