

Attention: Don Brown, Clerk for the Illinois Pollution Control Board

Concerning STANDARDS FOR THE DISPOSAL OF COAL COMBUSTION RESIDUALS IN SURFACE IMPOUNDMENTS: PROPOSED NEW 35 ILL.ADM.CODE 845

My name is Suzanne Smith. I live with my husband on his family's multigenerational farm near Homer, Illinois along the Champaign/Vermilion county line in East Central Illinois. I am familiar with all three branches of the rich, biodiverse ecosystems of the Vermilion River system in East Central Illinois through farming and recreating along the Salt Fork, conducting contract work for the Illinois Department of Natural Resources along the North Fork, and through recreation and citizen scientist sampling through RiverWatch and annual bird counts along the Middle Fork. Thank you for this opportunity to submit a few personal comments for your consideration.

As a premium recreation destination for people from all across Illinois, I am concerned for the health and safety of local and statewide residents using the Middle Fork River in light of ongoing erosion occurring at coal ash impoundments in its floodplain due to flood events that are rapidly cutting into the coal ash berms. During RiverWatch sampling at the canoe out-take point at Kickapoo State Park, it was common for me to see 50-100 people young and old on a given morning either fishing, kayaking, canoeing or just playing in the river during a mid-week sampling in June. Many were immersed in the water. The proposed rules fail to assure long-term protection for human safety and public health. **I ask that you include language in the rules that requires coal ash not be left in contact with water or in any circumstances that will likely allow future contact with water. They must not allow closure in place of coal ash impoundments sited in locations that jeopardize their stability, including floodplains like those along the Middle Fork River.**

In addition, the area surrounding the coal ash pits will need to be protected during the removal and redistribution of the ash. With extensive public access to Illinois' only Wild and Scenic river through state and federal parks, I encounter many people enjoying the river and wooded riparian corridor of the Middle Fork. The trail systems for hiking are extensive and deer hunting is extremely popular on private land and through a lottery on public land nearby. As a kayaker I am on the river periodically with friends, as a hiker and birder I participate in the annual Christmas bird count with many members of the Champaign County and Middlefork Audubon Societies in Dec and early January, and with members of the Illinois Native Plant society and friends I enjoy hikes to find Yellow Lady's Slipper orchids and other spring wildflowers along the bluffs of the Middle Fork in spring. **With so much activity in these public areas year-round, removing the coal ash from the floodplain responsibly for both workers and the surrounding community is critical. Fugitive dust monitoring, worker protection, and safe transportation of the coal ash must be written into the final rule.**

As Illinois' only federally designated Wild and Scenic River, the Middle Fork of the Vermilion is a true gem. It is a biologically significant stream that demands protection from coal ash contamination. I appreciate and value the diversity of plant and animal life in and around its waters and ask you to ensure that the ground and surface waters surrounding this and other coal ash pits is properly monitored to ensure clean water for the not only the citizens of Illinois but for the wildlife also. **No coal ash contaminated background wells should be allowed under your new rules to ensure that any background well testing is accurately measuring clean groundwater. The health and well-being of all life is at stake now and long into the future.**

While I have focused on the coal ash concerns in my area, I urge you to establish strong statewide rules to address coal ash at all 73 Illinois EPA identified locations throughout Illinois. **I encourage you to make the very best rules you possibly can without any proposed rollbacks from the federal rule to ensure a healthy future for our state's citizens.** Please, create strong rules that will ensure proper clean-up of all forms of coal ash in our state. Your decisions will help ensure that Illinois can be an attractive and appealing place where people and the environment can thrive together in vibrant communities that take us confidently into the future. Thank you.

Respectfully submitted,

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