

Illinois Pollution Control Board Hearing on Coal Ash Rulemaking 8-12-2020

IPCB and the IEPA have an extremely important task. Your responsibility is to protect citizens and communities from the toxicity of coal ash. On the Federal scene, health protections from coal ash disposal are lacking which place even more responsibility on you. I live in Litchfield near Carlinville Shay 1 Mine, Coffeen Power Plant, and Deer Run Mine in Hillsboro. My background includes 15 years of medical research and 15 years teaching chemistry.

The coal industry including coal-fired utilities and coal mining has dominated public policy for decades but hopefully not the future. The coal ash rulemaking must ensure not only a safe and healthy future for citizens, but also correct some invalid rulings of the past. Coal ash is a highly hazardous waste that is being used in a careless manner to benefit the coal industry at the demise of health and safety in Illinois communities.

Coal mining in Illinois has a sacred cow status that has damaged communities and health of citizens. The present coal ash rules do not include coal slurry impoundments that have been the disposal sites for millions of tons of coal ash imported from both Illinois and out of state coal fired utilities. The Shay 1 Mine was allowed to accept coal ash deposits or CCB for beneficial use in unlined refuse disposal areas that have been contaminating ground water for decades. These impoundments will continue to receive coal ash as scheduled in the reclamation plan. The placement of coal ash in coal mines is a back doorway to dispose of toxic coal ash that enhances profits for the coal-fired utilities and coal mines while exposing essential community water resources to unhealthy contaminants.

The idea that if encapsulated, the coal ash can be safely used in concrete is fine, but that is not the whole picture. This has resulted in coal ash being used in unsafe ways as construction fill, coal slurry impoundment fill, reclamation of unlined impoundments, and filler for coal mine voids.

There are specific conditions for coal ash to be used as coal combustion byproducts for structural fill and coal mine use. (A) CCB shall not have been mixed with hazardous waste prior to use. Coal ash is already hazardous, so not a useful statement. (B) CCB shall not exceed Class 1 Groundwater Standards for metals when utilizing test method ASTM D3987-85. The samples tested must be representative of the CCB considered for use.

The test method ASTM D3987-85 is assumed to be valid for predicting the solubility and leaching of contaminants from the coal ash. The problem is that placing coal ash permanently in places that are exposed to water from varying sources negates the validity of this test. A limited time test in a laboratory is not representative of what happens in nature. Le Chatelier's Principle determines the steady state equilibrium that exists between a concentrated material and the effluent surrounding the material. The cap-in-place will not stop pollution of groundwater.

The closed Coffeen Power Plant has coal ash ponds that have polluted ground water at levels unacceptable for healthy outcomes. The closure plan for Ash Pond 1 is to dewater and then cover with a clayey soil cover with vegetation to minimize or eliminate infiltration of liquids. The closure plan for Ash Pond 2 has been approved by IEPA and will again be a cap in place. Coal ash Pond 2 is leaking cobalt at 70 times the safe standard of 0.006 mg/l. Excess Cobalt is known to harm the heart, blood, thyroid, and other vital areas in the body.

These coal ash ponds near Coffeen Lake are a problem for citizens in the area because the cleanup requirement is not protecting them from exposure to unhealthy well waters and surface waters. Cap-in -place does not protect citizens living nearby. Our community has a forever health and environmental hazard for us and our families.

Thank You for your continued efforts to help.

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