

From: [Craig Mousin](#)
To: [Brown, Don](#)
Subject: [External] Coal ash protection
Date: Tuesday, October 27, 2020 7:45:03 PM

Dear Mr. Brown:

I write to urge the Illinois EPA and Illinois Pollution Control Board to adopt strong rules for managing and storing toxic coal ash. I join many other citizens in calling for you to engage in:

- Robust and meaningful public participation.
- Thorough vetting of impoundment closure options.
- Implementing rules that ensure coal ash cannot be exposed to water.
- Ensure prioritization of environmental justice communities & high risk impoundments.
- Develop strong safeguards against coal ash dust pollution to protect communities and workers.

In addition, I comment on two specific areas:

1. *Community Classification & Cumulative Impacts.* The proposed rules use the Illinois EPA's EJ Start tool to identify environmental justice communities, but that tool leaves out some of the most impacted communities. The final rule should use the information from US EPA's Environmental Justice Screen and the Clean Power Plan to identify environmental justice communities. Using this information, the rule can begin to account for cumulative impacts - the combined, incremental effects of multiple pollution sources - on sensitive or vulnerable populations. Without assessing the cumulative impact, our residents will face those risks without full knowledge, a risk that no one should experience.
2. *Language Access.* The final rules should include requirements for both Illinois EPA and industry to meaningfully engage non-English speaking populations, including requirements that, if requested, interpreters be present at the meetings, hearings, translation of permit materials. As proposed, there is only one isolated requirement for translating anything in the rule.

Although I currently live in Chicago, I have lived in Champaign for five years and enjoyed the benefits of the Middle Fork of the Vermilion River. I have also spent over forty years working for immigrant rights, mostly refugees in Illinois and farmworkers throughout the entire state. I am well aware of the difficulties these communities face in understanding discussions of public safety if proper translation is not made available. Farmworkers also, by the nature of their work, often face some of the most dangerous environmental hazards. Like all residents of Illinois, moreover, they deserve the protection of strong rules protecting us all from the hazards of coal ash.

Therefore, I request you and the Board implement rules that protect us all from the hazards of coal ash. Please write to me to inform me what steps you are taking to permit me

to inform my congregation how you are protecting all the residents of this great state.

Very truly yours,

Rev. Craig B. Mousin

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