

October 30, 2020

To the Illinois Pollution Control Board,

These are general comments on the rulemaking R 2020-19 concerning Coal Combustion Residuals (CCR).

I believe a primary concern is the protection of surface and groundwater near both existing and future CCR facilities. Preventing water from saturating and seeping through stored CCR is a necessary requirement. The severity of any threat will vary depending upon site conditions.

It should be obvious, given the historical failures of flood control projects over time, that CCR facilities should not be located in delineated floodplains. This is particularly true in situations where a lake or river is adjacent to or near the actual storage units. Situations where the current is flowing around a bend and has historically eroded the shore also deserve special attention. CCR should be removed from such areas because it is highly unlikely that the shoreline can be protected in perpetuity. An excellent example of such a situation exists on the Middle Fork River at the Dynegy Site in Vermilion County. The river is meandering toward the facility and it will eventually cut into the CCR. Breach of containment along a river or lake would allow material to directly enter the water and be dispersed into the environment.

It will be important that the rule require protection to prevent erosion of cover at upland facilities.

Dust control during any related activities should be required, given the nature of the chemicals associated with CCR.

Public notice should provide adequate time for interested parties to obtain and review documents. Related permit reviews, hearing and other matters will tend to be complex and require time to review. Additionally, applicants should be required to provide copies of key documents and other material used as the basis for assertions in the application.

Background levels of contaminants in groundwater and other resources will probably be used to determine whether a facility is in violation and to establish future requirements and correction measures. It is important that the "clean" background samples be taken in locations that are not subject to contamination from the facility in question.

Respectfully submitted,

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