

From: [Kristin Camp](#)
To: [Brown, Don](#)
Subject: [External] IPCB R2020-19; Sub Docket A
Date: Tuesday, August 3, 2021 3:05:22 PM

To: Clerk of the Board Don Brown

RE: Coal Ash Rules

I live in Vermilion County next to the Dynegy Coal Ash Pits, and care deeply about the effects of coal ash pollution to local communities. I provided public testimony during the main coal ash rulemaking, and want to make sure that the final rules include:

1. Regulation of historic, unconsolidated coal ash fill areas in the State.

- It is essential that historic, unconsolidated coal ash fill be regulated. Coal ash fill areas around Illinois are already contaminating groundwater and surface water; they must not be allowed to continue polluting our waters.
- If coal ash fill is in contact with groundwater, in a floodplain, or in an unstable area, the only way to protect our water is to move the ash to a safer place.
- If coal ash fill is not removed, groundwater at the fill site must be monitored and, if coal ash pollutants are found at levels exceeding protective standards, the contamination must be cleaned up and further contamination halted.

2. Regulations on the use of temporary storage piles of coal ash, including time and volume limits.

- Storage piles are not temporary if coal ash can be stored for unlimited duration. Duration and volume limits should be imposed; this allows controls to be appropriately designed and minimizes pollution from piles.
- The Board should require more protections against pollution from ash piles, including setbacks from waterways; frequent inspections and repairs to make sure liners under piles are not damaged; and drop distance limits to minimize exposure of ash to wind.

3. Fugitive dust monitoring plans for areas neighboring CCR surface impoundments.

- Inhaling coal ash dust can be severely harmful, as shown by the devastating health problems of workers who cleaned up the coal ash spill in Tennessee. Limiting dust to safe levels is essential to protect workers and communities near ash ponds.
- Dust monitors are a key safeguard to ensure that controls are effective: if safe levels are not achieved, regulators, companies and the public know that controls must be adjusted.
- Monitoring should be required at coal ash ponds, any transfer points where coal ash dust will be exposed to the elements, and final disposal or reuse areas.
- Adequate reporting requirements are crucial to provide accountability for facilities and to ensure any air pollution is addressed in a timely manner.

I appreciate the board taking on this urgent issue. I hope the rulemaking can proceed in a timely manner.

Thank you,

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