

From: [Toni Oplt](#)
To: [Brown, Don](#)
Subject: [External] Comments on Sub Docket A: Coal Ash Pollution Prevention Act
Date: Thursday, August 5, 2021 4:40:32 PM

Hello, My name is Toni Oplt and I am submitting the following comment regarding Sub Docket A of the Coal Ash Pollution Prevention Act. Please let me know if you have any questions or if there is something else I need to do. Thank you for this opportunity to express my opinion.

To begin, I wish to thank the Illinois Pollution Control Board for diligently continuing its work on the rulemaking process required by the Coal Ash Pollution Prevention Act. In particular, I appreciate the Board's decision to open this sub docket and solicit public comments. We must get this ruling right—we must move forward with strong safeguards against further deadly pollution caused by coal ash in a timely manner.

As Chair of the Metro East Green Alliance and Executive Board Member of the Piasa Palisades Group of Illinois Sierra Club, as well as a longtime resident of the Metro East area along the Mississippi River, I have participated in the formulation of the Coal Ash Pollution Prevention Act since the beginning. I have stood alongside fellow environmental advocates to fight for the strong rulings in the Coal Ash Pollution Prevention Act during sweltering summer heat and frigid winter weather. We all remember the January hearing during that rip in the Polar Vortex, yet we arrived in impressive numbers despite the freezing temperatures. We are committed to see this through.

I live near the site of the now-demolished Wood River Power Station, where there remain four large coal ash ponds, three unlined and one improperly lined. The Wood River Creek, which flows directly into the Mississippi, is mere feet from the West Ash Pond.

As you probably know, the site of the Wood River Power Station is designated a floodplain and as such is considered an area of high risk for coal ash ponds, per SB9. Because Commercial Liability Partners, the company that now owns this site, has denied us any public engagement, any volunteered transparency of their actions, any assurances that the demolition caused no harm to the community of East Alton, nor that the ash ponds pose serious threat to groundwater supplies (other than required monitoring, which has already shown levels of pollutants such as Boron to exceed IEPA acceptable limits), we are concerned about several aspects of the rulemaking sub docket—not just for our local issue but for all coal ash ponds and landfills across the state because, as we all know, pollution in one area threatens communities everywhere. The issues that most concern us are:

Historic, unconsolidated coal ash fill must be regulated. While we have little way of knowing if coal ash fill is a threat at Wood River, we know coal ash fill has been found at other sites in the state. We see it as enough of a possible threat to support the following actions because of the sites' designation as a floodplain and its close proximity to both surface and groundwater: Power plant owners should be required to identify coal ash fill on their properties. 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 this is the case at Wood River or at any other coal ash fill site across the state, the ash should be safely removed, or at the very least, the groundwater at the fill site must be monitored; then, if coal ash pollutants are found at levels exceeding protective

standards, the contamination must be cleaned up and further contamination halted.

Piles of coal ash designated as “storage piles” should have a set time at which they must be cleaned up. These piles are meant to be temporary, not stored for unlimited duration. Limits on the duration and the amount of ash should be imposed. Setting time and volume limits minimizes pollution from piles. We ask that the Board require more protections against pollution from ash piles, including setbacks from waterways, which is a big concern at Wood River; frequent inspections and repairs to make sure liners under piles are not damaged; and that ash is not allowed to blow in the wind, further contaminating surrounding communities.

Our years of work on this issue and our expert partners in environmental science confirm that 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. This is an issue we brought to public attention during the demolition of the Wood River Plant, but we feel we had little power to safeguard the surrounding communities. Dust monitors are a key safeguard to ensure that controls are effective: if safe levels are not achieved, regulators, companies and the public should know that controls will 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 remind the Board that our efforts to engage with the current owner of the Wood River site were unfruitful. We cannot trust them. We must put our trust in you and the Illinois Environmental Protection Agency to ensure public safety and preservation of our precious ecosystem along the Mississippi.

Thank you so much for your attention and time, for listening to our concerns. Please keep our concerns in mind as you weigh these complex issues.

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