

**From:** [jwdmed@consolidated.net](mailto:jwdmed@consolidated.net)  
**To:** [Brown, Don](#)  
**Subject:** [External] Comments on Case # AS 2021-006  
**Date:** Saturday, June 28, 2025 7:56:53 PM

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Don Brown, Clerk

Illinois Pollution Control Board

June 28, 2025

Via email: [don.brown@illinois.gov](mailto:don.brown@illinois.gov)

RE: Public comments on Case # AS 2021-006. Deny SIPC's request for an exemption from regulations adopted for coal combustion residuals (CCR) at Marion Generating Station.

Dear Members of the Illinois Pollution Control Board,

As a retired chemistry teacher and medical researcher, I am very troubled by the careless and unhealthy ways that coal-fired utilities have proposed to close coal ash ponds and piles. CCR has been shown to be a hazardous waste. It requires appropriate safety and health management at its disposal. It is sad that the utilities try to get out of responsibility for the health of their communities by trying to avoid the current CCR regulations.

The Southern Illinois Power Cooperative (SIPC) proposal to have its 8 coal ash ponds exempted from complying with the Illinois regulations has already been twice rejected by IEPA. SIPC seems to be ignoring the ongoing contamination of groundwater by the coal ash ponds. SIPC own groundwater data show toxic pollution that includes arsenic, cadmium, boron, and other contaminants. The coal ash closure rules must be safely and appropriately enforced. Please reject SIPC request for an exemption. Please require that the closure of all 8 coal ash ponds be in compliance with current coal ash regulations.

Coal-fired utilities and coal mines have a privileged relationship where the toxic coal ash can be disposed of at active and reclaimed mines for "beneficial" use. The toxicity of the CCR remains for the residents while both the mine and utility profit. The harm to the health of residents and the pollution of the air, water, and land with carcinogenic chemicals from coal ash must not continue. Presently, many communities such as mine are exposed to coal ash contamination and are fighting to protect their surroundings.

I live in Montgomery County, Illinois near the Deer Run Mine. Deer Run Mine in Hillsboro

has applied for use of CCR in the construction of an increase in height of high hazard coal slurry impoundment RDA-2. If Permit No. 424 Revision 1 is approved by IDNR, coal combustion waste from City Water, Light, and Power (CWLP) may also be approved for use at Deer Run Mine. There is a contract to sell coal from Deer Run Mine to CWLP with the coal ashes returning to the mine. The Montgomery County Board passed Resolution No. 2025-8 in opposition to both the increase in height of RDA-2 and the use of CCR that would cause undue health and safety risks. IDNR is requiring modifications of Permit No. 424 Revision 1 application, but to my knowledge, IDNR has never denied a coal mining permit. The CCR was an insignificant permit application that does not require public participation.

Your service is most appreciated in keeping Illinois safe and healthy.

Sincerely yours,

Mary Ellen DeClue  
Litchfield, IL 62056