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3/1/2016

Illinois Pollution Control Board
Attn: John Therriault, Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph Street, Suite 11-500
Chicago, IL 60601

RECEIVED
CLERK'S OFFICE

MAR - 2 2016

STATE OF ILLINOIS
Pollution Control Board

PCA # 3920

RE: R14-10; COAL COMBUSTION WASTE (CCW) ASH PONDS AND SURFACE IMPOUNDMENTS AT POWER GENERATING FACILITIES: PROPOSED NEW 35 ILL. ADM. CODE 841

Dear Mr. Therriault,

I'm a resident living near the Waukegan Generating Station at 401 East Greenwood Ave. Waukegan, Illinois 60087. Midwest Generation, LLC recently posted an annual inspection report for the two coal ash ponds at this site, which each hold approximately 53,616 cy of coal combustion residue (CCR).

I'm concerned about the serious public health hazard and environmental threat to my community from the coal ash ponds. Coal ash is a byproduct of coal combustion and contains high levels of harmful heavy metals such as arsenic, lead, selenium, and many more. Waukegan plant has two active coal ash ponds that sit just over 300 yards from the shore of Lake Michigan. While the ponds have plastic liners, monitoring reports from these groundwater wells have revealed groundwater contamination from common pollutants of coal ash, such as arsenic, boron, manganese, sulfates, pH, chloride, iron, selenium and total dissolved solids.¹ On going monitoring around these ponds continue to show exceedances of many of these pollutants even after Illinois EPA got involved. Additionally, we have learned that coal ash had been stored elsewhere on the site in the past and never cleaned up. This coal ash is also likely to be contributing to groundwater contamination. This follows the terrible pattern of companies who go into bankruptcy and abruptly leave our community and lakefront behind with a devastating legacy of pollution that our community and taxpayers have to clean up.

The annual inspection report for the East and West Ash Basins documented threats to the structural stability of the basins including slopes bare of vegetation, evidence of animal burrows, and the need for measures to control erosion. In addition, the inspection found that a pipe conveying CCR as part of the inlet distribution system for East Basin was disconnected. The report says that this pipe should be reconnected as soon as feasible and prior to utilization of the inlet distribution system. Failures of

proper operation such as the disconnection of this pipe and instability of the pond slopes raise concerns about potential impacts on surrounding groundwater and surface water.

If or when these ash ponds are closed, we need strong protections against such impacts. The Illinois rules for closure would require compliance with Illinois groundwater and surface water quality standards, a protection that the federal coal ash rule lacks. These requirements are needed to protect the water supplies for residents in the area and aquatic life, especially considering the prior exceedances of water quality standards reported at this site.

The state rule is also an important opportunity to include financial assurances, as recommended by the Illinois Attorney General's office. We need these assurance so that my community and the state isn't left to cover cleanup and closure costs as we have from so many other industrial businesses on our lakefront. Making sure companies with coal ash ponds clean up their mess is essential to create more long-term opportunities for re-use of these properties that will be important for economic development for Waukegan.

Please implement the Illinois rules as quickly as possible so that my family and community are protected from impacts of the coal ash pits at the Waukegan Generating Station.

Thank you,
Celeste Flores

cc: State Representative Rita Mayfield
State Senator Terry Link

¹<http://www.ipcb.state.il.us/COOL/external/CaseView.aspx?referer=results&case=14512>