

Therriault, John

From: Peggy Jones <trinitysolutions@sbcglobal.net>
Sent: Thursday, March 03, 2016 6:43 PM
To: Therriault, John
Cc: 60thdistrict@gmail.com; senator@link30.org
Subject: Coal ash comments

Peggy J Jones
2836 Forest Lane
Waukegan, IL 60087

PC# 3923

March 3, 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

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,
Peggy J Jones

cc: State Representative Rita Mayfield
State Senator Terry Link

Therriault, John

From: Maryfran Troha <maryfran_troha@sbcglobal.net>
Sent: Thursday, March 03, 2016 9:01 PM
To: Therriault, John
Cc: 60thdistrict@gmail.com; senator@link30.org
Subject: IEPA Coal Ash Regulation

PC# 3924

Illinois Pollution Control Board:

As a lifelong Waukegan resident, I urge the IEPA to move forward with the review of the coal ash rules proposals that strengthen assurances of protection to those of us living with coal ash ponds in our communities. We need strengthened rules that go beyond federal rules, in particular, that coal plant operators must be required to set aside monies for the clean-up of coal ash waste when they close plants they have operated.

These strengthened rules are necessary for Waukegan's continued Lake Michigan shoreline clean-up effort and subsequent future economic development for our city.

Thank you,

MaryFran Troha

Sent from my iPad

PC#3925

Therriault, John

From: Karen Long MacLeod <karenlongmacleod@gmail.com>
Sent: Thursday, March 03, 2016 10:08 PM
To: Therriault, John
Cc: State Senator Terry Link; State Rep. Rita Mayfield
Subject: Comment re R14-10 Coal Combustion Waste (CCW) Ash Ponds: Proposed New 35 ILL. Adm. Code 841

March 3, 2016

Illinois Pollution Control Board

Attn: John Therriault, Clerk

James R. Thompson Center

100 W. Randolph St., Suite 11-500

Chicago, IL 60601

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 live in Waukegan just 2.2 miles from the Waukegan Generating Station, 401 E. Greenwood Ave., Waukegan, IL 60087. I am concerned that the two coal ash ponds at the Waukegan site pose a serious public health hazard and an environmental threat to my community.

These two active coal ash ponds each hold approximately 53,616 CY of coal combustion residue (CCR), according to an annual inspection report posted recently by NRG Energy. Unfortunately, these two ash ponds sit just 300 yards from the shore of Lake Michigan.

While the ponds have plastic liners, monitoring reports on groundwater wells have revealed groundwater contamination from common pollutants associated with coal ash, such as arsenic, boron, manganese, sulfates, pH, chloride, iron, selenium, and total dissolved solids (see <http://www.ipcb.state.il.us/COOL/external/CaseView.aspx?referer=results&case=14512>). Ongoing monitoring efforts around these ponds continue to show exceedances of many of these pollutants—even after the Illinois EPA got involved.

Additionally, we have learned that coal ash stored elsewhere on the site was never cleaned up. This coal ash is likely to be contributing to groundwater contamination, too.

The annual inspection report for the East and West Ash Basins at the Waukegan Generating Station documented threats to the structural stability of the basins, including evidence of animal burrows, and the need for control erosion measures. In addition, the inspection found that a pipe conveying CCR as part of the inlet distribution system for the 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 the 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 will need strong protections against such impacts. The Illinois rules on coal pond 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 this area as well as aquatic life.

The state rule also represents an important opportunity to include financial assurances, as recommended by the Illinois Attorney General's office. The people of Waukegan—and indeed, people throughout Illinois—need these assurances so we don't get stuck with an enormous bill for cleaning up yet another toxic industrial site abruptly abandoned by a bankrupt company. Our community is still fighting to overcome the devastating legacy of pollution left by numerous other industrial businesses on our lakefront. Making sure companies with coal ash ponds clean up their messes is essential if we are to create long-term opportunities for re-use of these properties and drive economic development in Waukegan.

Please implement the Illinois rules as quickly as possible so that I, my friends and neighbors, and my community are protected from impacts of the coal ash ponds at the Waukegan Generating Station.

Sincerely,

Karen Long MacLeod

347 Douglas Ave.

Waukegan, IL 60085

Email: karenlongmacleod@gmail.com

Telephone: 224-610-0355

cc: State Representative Rita Mayfield

State Senator Terry Link

PC#3926

The Rev. Eileen M. Shanley-Roberts
326 N Martin Luther King Jr AV
Waukegan, IL 60085

3 March 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

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 and working near the Waukegan Generating Station at 401 East Greenwood Ave. Waukegan, Illinois 60087. NRG, 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,
Eileen Shanley-Roberts

cc: State Representative Rita Mayfield
State Senator Terry Link

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

Julio Cesar Guzman
12440 W. Brooke Ave.
Waukegan, IL 60087

PC#3927

March 2, 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

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,
Julio Guzman

cc: State Representative Rita Mayfield
State Senator Terry Link

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



PC#3928

LEAGUE OF WOMEN VOTERS - Lake County

Feb. 29, 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

RE: R2014-10PC; COAL COMBUSTION WASTE (CCW) ASH PONDS AND SURFACE IMPOUNDMENTS
AT POWER GENERATING FACILITIES: PROPOSED NEW 35 ILL. ADM. CODE 841

Dear Mr. Therriault,

Midwest Generation, LLC (NRG) recently posted an annual inspection report for the two Waukegan coal ash ponds, each holding approximately 53,616 cy of coal combustion residue (CCR).

The League of Women Voters of Lake County strongly supports environmental standards that will protect public health by limiting dangerous pollutants like toxic mercury, arsenic, soot, smog, carbon dioxide, and coal ash caused by coal plants. The League is concerned about the serious public health hazard and environmental threat to Waukegan and other communities from the coal ash ponds.

Water pollution is a serious issue. The Waukegan plant has two active coal ash ponds located just 300 yards from Lake Michigan. While the ponds have plastic liners, monitoring reports have revealed groundwater contamination from common pollutants of coal ash. Additionally, the annual inspection report outlined a number of improper operations which could lead to contaminating groundwater and surface water.

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 and aquatic life.

The state rule is also an important opportunity to include financial assurances, as recommended by the Illinois Attorney General's office. Assurance is needed so that Waukegan and the state isn't left to cover cleanup and closure costs, as often has been required in the past, due to bankrupt and/or departing corporations.

Please implement the Illinois rules as quickly as possible so that Waukegan, Lake County, and Lake Michigan are protected from impacts of the coal ash pits at the Waukegan Generating Station.

Sincerely,
Mary Mathews, Director

cc: State Representative Rita Mayfield
State Senator Terry Link

c/o 1111 S. Waukegan Rd., Lake Forest, IL 60045

PC#3929

Therriault, John

From: Alex <alexander.b.morgan@gmail.com>
Sent: Wednesday, March 02, 2016 11:53 PM
To: Therriault, John
Cc: biss@senatedem.illinois.gov; staterepgabel@robyngabel.com
Subject: 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 of Evanston, 30 miles south of 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 cubic yards of coal combustion residue (CCR).

I'm concerned about the serious public health hazard and environmental threat to the greater Waukegan area 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 other materials. The Waukegan plant has two active coal ash ponds that sit just over 300 yards from Lake Michigan. While the ponds have plastic liners, groundwater monitors reveal groundwater contamination from common coal ash pollutants such as arsenic, boron, chloride, iron, manganese, pH, selenium, sulfates, and total dissolved solids. Ongoing monitoring around these ponds continue to show exceedances of many of these pollutants despite Illinois EPA involvement.

Additionally, I've learned that coal ash had been stored elsewhere on the site and it was never cleaned up. This coal ash is likely to be contributing to groundwater contamination as well. This follows the terrible pattern of companies that go into bankruptcy and abruptly leave our communities and lakefront behind with a devastating legacy of pollution. In the end, communities and taxpayers end up bearing the burden of 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. Additionally, the inspection found that a pipe carrying 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 the 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 and when these ash ponds are closed, we need strong protections against such impacts. The Illinois rules for closure should 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 our communities aren'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 long-term opportunities for re-use of these properties that will be important for economic development for the greater Waukegan area.

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.

Respectfully submitted,
Alexander Morgan
728 Hinman Ave, Unit 2E
Evanston, IL 60202

CC: State Senator Daniel Biss, State Representative Robyn Gabel

PC#3930

2206 Boudreau Cir
Urbana IL 61801
2 March 2016

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

Re Coal ash proceedings

Since the Dynege Vermilion plant was shut down 5 years ago I have grown increasingly concerned about the fate of the three huge piles of coal ash dumped along the riverbank over the 65 years of plant operation. For the reasons outlined below I urge you to reopen the coal ash rulemaking, and enact a rule ASAP for Illinois.

To remove a clear and present danger to the state's only National Scenic River

I have canoed/kayaked the Middle Fork of the Vermilion River hundreds of times since 1969, observing the orange leachate that oozes through the riverbanks along the two unlined ash lagoons. I am aware of studies finding heavy metals and other pollutants in the groundwater as well as animals living in the river – a sad fate for the state's best smallmouth bass stream and high quality river ecosystem.

Despite obvious and continuing erosion all three lagoons have been enlarged to encroach on the riverbank. Gabions installed ca. 1980 have long ago disintegrated as the leachate dissolved the wire cages and emptied their contents – along with shredded geofabric – into the river. I have seen the power company plant trees on the dam slope, only to see them die a few years later when their roots reached the toxins that lay below.

Every time the river rises water is forced through the banks and flows along the bedrock that forms the river bottom. While the river is high, the pressure forces the water upwards through the bottom of the unlined pits; as the river recedes, the polluted water seeps out of the pits through the unlined bottom and through river bank. Repeat.

The 40-ft high ash dams could fail at any time. I have observed the damage inflicted along the river during floods and ash breakup when floating trees and other heavy and sharp debris pummels anything in its path. The 1994 flood raised water levels 20 feet at the USGS gage a few miles downstream of the ash; the peril would be greater if we have another flood of record (1939) that carried twice as much water. Failures of other ash dams have shown how easily the ash can be turned to a slurry that carries toxins many miles downstream, depositing them irretrievably on the river bottom.

To provide certainty for industry and taxpayers

The threats to health and safety of downstream water drinkers is obvious. What is not so obvious is the threat to taxpayers who – as a result of IPCB inaction – could end up paying hundreds of millions of dollars to clean up the dozens of similar ash dumps located in floodplains. Dynege has already been in and out of bankruptcy once since it purchased the Vermilion plant. The entire coal mining and combustion industries are facing the same financial difficulties as more coal fired power plants close.

Now is the time to establish rules that require owners to remove all toxic coal ash from floodplains throughout the state. Rivers own their floodplains. In fact the floodplain along the Middle Fork Vermilion is defined by 60-80-ft high bluffs bordering the river valley – the river has carved that valley by meandering from bluff-to-bluff for millennia. You must decide whether to require the ash be relocated safely away from water, or to establish a perpetual-care fund of unprecedented magnitude.

This is a decision that must be made now. Dynegy is a Texas corporation that has assets and messes spread over many states. The states that act first are more likely to get their messes cleaned up at Dynegy's expense. Besides, is it not hypocritical for Illinois to lament the imposition of "unfunded liabilities" by the federal government, while delaying indefinitely the task of cleaning up local messes? Isn't the irresponsibility compounded by the fact that many of these messes are capable of poisoning water supplies in downstream states?

Your job is to protect taxpayers from liabilities left by irresponsible companies that defer necessary maintenance and leave their messes behind. I trust that you agree that the public will be better served by you doing your job now instead of leaving it to the whims of a bankruptcy judge later.

I currently serve as vice-chair of the board of the National Wildlife Federation, and am familiar with the coal ash situation nationally. Waiting for a one-size-fits-all national solution to the problem does not appear to me to be the wisest approach. I believe it is in Illinois' interest to tailor a solution to our own unique geographic and economic situation so long as it is protective of downstream interests beyond our borders. Such action would position Illinois to request exemptions from any overly-prescriptive measures that might be part of any future rulemakings.

Sincerely,

Clark Bullard

PC#3931

Joyce Blumenshine
2419 E. Reservoir
Peoria, IL 61614
March 3, 2016

Illinois Pollution Control Board
ATTN: Mr. John Therriault, Clerk
James R. Thompson Center
100 W. Randolph St., Ste. 11-500
Chicago, IL 60601

Public Comment Regarding: Case R14-10 Coal Combustion Waste Ash Ponds and Surface Impoundments at Power Generating Facilities Proposed New 35 Illinois Administrative Code 841

To the Illinois Pollution Control Board:

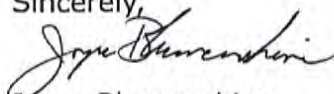
As a long-time Peoria home owner, and previously Pekin resident, I am concerned about the coal ash ponds at the Dynegey E.D. Edwards Power Plant outside of Bartonville and the Midwest Generation Powerton Plant outside of Pekin. Both plants have coal ash ponds located in proximity to the Illinois River, which I enjoy for recreational boating and at times, even canoeing. I have friends and family who boat on the river in the vicinity of these power plants and I am concerned about the public health dangers and the environmental risks the coal ash ponds and impoundments at these plants present. I am concerned about the public health and environmental health risks from high levels of toxic heavy metals at these sites. Selenium, arsenic, and lead, along with other contaminants can leach into our area groundwater and enter the Illinois River via pond discharges, seeping, or high river flooding events. Lead is a particular concern in the Peoria metro area, as we have one of the highest lead poisoning levels of children in the state. These plants are also Environmental Justice issues, as they affect the south end of both Peoria and Pekin, which have higher levels of poverty. The south end of Peoria has higher minority levels.

I travel by the Edwards plant regularly. There are always large mounds of what look like coal ash easily seen from the highway and dust conditions have been so annoying at times I have stopped to take a photo. The coal ash pond is beyond the mounds and not readily visible from the highway. I am very concerned about it, as it is near the Illinois River and is listed to hold about 3,900 acre feet of coal combustion residue. The Dynegey annual inspection report for this ash pond states that there is woody vegetation limiting their ability to inspect the toe area base of the embankment. I do not understand why there are not steps that the company has to take to complete this inspection of this part of the embankment. There appear to be no recommended procedures to insure that a full inspection is completed and that the full structural stability is assessed. Edwards has permanently shut down one unit of its power generating units. If the plant closes its ash pond, the public needs strong regulations to protect the area from long-term pollution issues from the decades of use of the ash pond and we need to know an accurate and up-to-date assessment from a full inspection of the engineering including the condition of the toe area of the embankment.

Recent reports indicate that Midwest Generation LLC intends to begin closing what was their former ash basin at the Powerton Plant. If the proposed Illinois Rules for ash pond closure were officially adopted by the Illinois Pollution Control Board, the public and area citizens of these plants would at least have the assurances that there would be compliance with the Illinois groundwater and surface water quality standards at these sites. Our Illinois specific standards are greatly needed because the federal rules are lacking this protection and others.

I strongly urge that you approve the Illinois Coal Combustion Waste Ash Ponds and Surface Impoundments at Power Generating Facilities proposed new Rules as soon as possible. Our state needs these important requirements to protect our rivers, other surface water resources and groundwater at these power plant ash facilities. Illinois has far too many aged coal fired power plants and coal ash ponds to allow these impoundments and ponds to be closed without strong regulations in place. We need our state proposed Rule approved to include financial assurances to protect local communities and state agencies from ending up with costs and clean up from these coal ash locations. Please include financial assurances, as recommended by the Illinois Attorney General's office, as local communities and the state agencies should not have to be faced with closed ponds and impoundments that have had inadequate clean-ups and require costly follow-up, or are left due to bankruptcy or other issues. The proposed regulations contain much needed requirements that will help protect local water supplies and protect communities for present and future generations. Our water resources and rivers and the wildlife and public that use them need these protections.

Sincerely,



Joyce Blumenshine