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MAR - 2 2016

STATE OF ILLINOIS
Pollution Control Board

Douglas Ower
1812 Dusk Dr
Zion, Il 60099

March 1, 2016

PCA 3921

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 of Zion which is a community close to 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, each of which hold approximately 53,616 cy of coal combustion residue (CCR).

I'm very concerned about the serious public health hazard and environmental threat to Waukegan and surrounding communities from the coal ash ponds. Coal ash contains high levels of harmful heavy metals such as arsenic, lead, selenium. The Waukegan coal plant has two active coal ash ponds that are very close to Lake Michigan. Both Waukegan and Zion and the nearby communities get their drinking water from Lake Michigan. 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. 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 and never cleaned up. This coal ash is also likely to be contributing to the groundwater contamination.

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.

Waukegan has a history of companies that go into bankruptcy and leave Waukegan and the lakefront behind with severely polluted areas that taxpayers are left to clean up. The Waukegan coal plant is an aging plant and at best is only likely to continue operate for a limited number of

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years. Midwest Generation declared bankruptcy and was purchased by NRG which is also struggling with the changing dynamics of coal fired electrical generation.

We need strong protections to make sure these coal ash ponds are cleaned up when they are closed. 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 our communities and the state are not 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 our communities are protected from impacts of the coal ash pits at the Waukegan Generating Station.

Thank you,

Douglas Ower