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To: [Brown, Don](#)
Cc: b-wallen@illinois.edu
Subject: [External] Coal ash rulemaking
Date: Thursday, August 13, 2020 2:28:28 PM

Mr. Brown:

I write in support of administrative rules created to implement the Coal Ash Pollution Prevention Act. I am particularly concerned with the effects of CCR toxins on wildlife. Bald Eagles, pelicans, many herons, egrets and cranes depend almost entirely on fish for their adult diet and for food for their chicks. They find fish in ponds and the Middle Fork River near the Dynegy Generation station where effluent from plant processing and storage of CCR waste contain toxins. Smaller birds feed on insects in the area which may have absorbed CCR toxins.

In a 2020-01-09 letter from the Middle Fork Audubon Society to the Illinois Environmental Protection Agency, Dr. Michael Ward, an avian researcher at the University of Illinois at Urbana-Champaign, was quoted as describing the bioaccumulation of contaminants in the food chain from insects and fish to smaller and larger birds and to their young.

This same bioaccumulation is a danger to humans who take fish, ducks and geese from these ponds and the River. In the current Dynegy Oakwood CCR storage, often only yards from the River, it has been established that CCR toxins are leaking directly into the River and into groundwater. Of the CCR waste management plans considered, Dynegy favors covering existing pits located near the River; this will not resolve the groundwater problem nor the danger of berm breaches. Moving this waste away from the river to another Dynegy Oakwood site is the most reliable long term solution for preventing this toxic leakage into public waterways and the solution that will limit public exposure to CCR dust created during this relocation.

More generally, CCR storage rules should not allow CCR storage in natural floodplains; rules should require that the content of existing CCR pits that have been located in floodplains should be moved out of them.

Brian Wallen