

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

In the Matter of:

STANDARD FOR THE DISPOSAL OF )  
COAL COMBUSTION RESIDUALS ) PCB 2020-019  
IN SURFACE IMPOUNDMENTS: ) (Rulemaking - Water)  
PROPOSED NEW 35 ILL. ADMIN. )  
CODE 845 )  
)  
)  
)

**NOTICE OF ELECTRONIC FILING**

To: Attached Service List

PLEASE TAKE NOTICE that on September 10, 2020, I electronically filed with the Clerk of the Illinois Pollution Control Board the **PREFILED QUESTIONS OF ELPC, PRAIRIE RIVERS NETWORK, AND SIERRA CLUB TO MELINDA HAHN**, copies of which are served on you along with this notice.

Dated: September 10, 2020

Respectfully Submitted,



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**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

IN THE MATTER OF: )  
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STANDARDS FOR THE DISPOSAL OF ) R 20-19  
COAL COMBUSTION RESIDUALS IN ) (Rulemaking – Land)  
SURFACE IMPOUNDMENTS: PROPOSED )  
NEW 35 ILL. ADM. CODE 845 )  
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**PRE-FILED QUESTIONS OF ELPC, PRAIRIE RIVERS NETWORK, AND SIERRA  
CLUB TO MELINDA HAHN**

1. On page 1 of your testimony, you state that the Cap and Run: Toxic Coal Ash Left Behind By Big Polluters Threatens Illinois water (“Cap and Run report”) does not make the “necessary statistical calculations.”
  - a. What are those “necessary statistical calculations”?
  - b. Have you completed those calculations?
  - c. If so, what were the results? If not, why not?
2. On page 1 of your testimony, you state that the Cap and Run report authors “use vague and superlative language to describe groundwater impacts from coal ash . . . which suggests that many people are being exposed to drinking water about health-based standards . . . which gives the false impression that the community water supply is impacted and residents are exposed to unacceptable health risks.”
  - a. Are you aware of where the data for the Cap and Run report, which you recognize is publicly available, comes from? If so, where?
  - b. If groundwater monitoring data shows that certain pollutants are above the health-based standard, is that groundwater safe to drink?
  - c. Are there any wells for domestic use near surface impoundments? Did you or Ramboll investigate where all of the residents get their water from in areas surveyed in the Cap and Run report?
  - d. Did Ramboll evaluate whether there are any barriers to the siting of drinking water wells, or other wells for domestic use, near CCR surface impoundments in the future? If so, please describe Ramboll’s findings and explain the barriers identified.
  - e. Did Ramboll evaluate whether there are any barriers to the siting of drinking water wells, or other wells for domestic use, in the future in aquifers currently



- affected by leachate from CCR surface impoundments? If so, please describe Ramboll's findings and explain the barriers identified.
- f. Did Ramboll evaluate whether there are any barriers to the siting of surface water intakes for drinking water or domestic use in the future in surface waters into which leachate from CCR surface impoundments is discharging? If so, please describe Ramboll's findings and explain the barriers identified.
3. On page 2 of your testimony, you describe a study that Ramboll completed to "update the well survey completed by IEPA from 2010-2011 GPPB report."
- a. Why was an update to the well survey needed?
- b. Could you provide a copy of Ramboll's report?
4. On page 2 of your testimony, you state that Ramboll's survey identified "all private, semi-private, and non-community water system (non CWS) wells and surface water intakes located at the site or within 2,500 feet of the site property boundaries, all community water system (CWS) wells and surface water intakes located at the site or within one mile of the site property boundaries, and all setback zones and regulated recharge area. . . associated with non-CWS or CWS wells in which all or any portion of the site is located."
- a. Why did Ramboll chose a radius of 2,500 feet of the site for its survey of private, semi-private, and non-community water system wells and surface water intakes?
- b. Did Ramboll evaluate whether CCR contamination can migrate, or has migrated, farther than 2,500 feet? If so, please describe Ramboll's evaluation and conclusions.
- c. Why did Ramboll chose a radius of 1 mile of the site property boundaries for its survey of community water system wells and surface water intakes?
- d. Did Ramboll evaluate whether CCR contamination can migrate, or has migrated, farther than 1 mile? If so, please describe Ramboll's evaluation and conclusions.
- e. Why did Ramboll evaluate only those setback zones and regulated recharge areas associated with CWS and non-CWS wells in which "all or any portion of the site" is currently located?
- f. Did Ramboll evaluate whether CCR contamination can migrate, or has migrated, into setback zones that do not overlap with any portion of the site? If so, please describe Ramboll's evaluation and conclusions.
5. On page 4 of your testimony, you state that Ramboll evaluated well survey results within the hydrogeological context of each site and surrounding area and considered other well characteristics.
- a. Please provide those survey results and well characteristics for each of the wells surveyed.
- b. How did you determine the accuracy of the mapped location and groundwater chemistry?



- c. Does groundwater flow direction change at times at some CCR surface impoundments? Did Ramboll take such changes in flow direction into account in its evaluation?
- 6. On page 4 of your testimony, you state that Ramboll looked at the risk of impact.
  - a. How was risk of impact calculated?
  - b. How far into the future does the risk of impact account for?
  - c. Why were the health-based standards for cobalt, molybdenum, and radium not used when accounting for risk?
  - d. Does “at risk” mean that the Part 620 Groundwater Quality Standards are met?
- 7. On page 4 of your testimony, you list 5 Dynegy-owned sites that were identified as having potable water supply wells and or surface water intakes located potentially downgradient from the sites within the search radii (Baldwin, Edwards, Havana, Hennepin, and Joppa).
  - a. The testimony also mentions on page 4 that there was site-specific information about the surface impoundment location, well location and characteristics, hydrogeology and groundwater quality that Ramboll reviewed for these 5 sites.
    - i. What are the sources for this information?
    - ii. When were these evaluations completed?
    - iii. Please provide copies of these evaluations.
    - iv. Where were the background wells placed in comparison to each of the wells tested?
    - v. Were all of the identified wells at each of these sites tested? When?
- 8. On page 4 of your testimony, you describe 2 sites of the 13-non-Dynegy owned sites that are potentially down gradient from surface impoundments.
  - a. Why did you determine that the wells at Wood River are incorrectly mapped?
  - b. Where were the wells tested at Joliet 9?
  - c. When were the wells sampled by IEPA determined to be unimpacted by the site?
  - d. Where were the background wells placed for each of the wells at the 2 identified sites?
- 9. On pages 4 and 5 of your testimony, you state that there were a number of water supply wells and surface water intakes in state databases that were mapped within 2,500 feet to 1 mile of the sites and that Ramboll reviewed this information.
  - a. Is there a report documenting the results of this review? If so, please provide the report.
  - b. How did Ramboll determine that there were no active potable water supply wells or surface water intakes at risk of impact from coal ash impoundments?



- c. How many is “a number of water supply wells and surface water intakes” and where are they located in relation to the surface impoundments?
- d. How did Ramboll calculate this “risk”?
- e. How far into the future did Ramboll calculate that risk?
- f. Are there factors that could change at a surface impoundment or with groundwater flow that would alter that risk?

Dated: September 10, 2020

Respectfully submitted,



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**CERTIFICATE OF SERVICE**

The undersigned, Jeffery T. Hammons, an attorney, certifies that I have served by email the Clerk and by email the individuals with email addresses named on the Service List provided on the Board's website, available at <https://pcb.illinois.gov/Cases/GetCaseDetailsById?caseId=16858>, true and correct copies of the **PREFILED QUESTIONS OF ELPC, PRAIRIE RIVERS NETWORK, AND SIERRA CLUB TO MELINDA HAHN**, before 5 p.m. Central Time on September 10, 2020. The number of pages in the email transmission is 10 pages.

Respectfully Submitted,



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