

From: [Virginia](#)
To: [Brown, Don](#)
Subject: [External] Written Comment submission on Final Coal Ash Rulemaking
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Public Comment for the Illinois Pollution Control Board
In the Matter of:
Standards for the Disposal of Coal Ash Combustion Residuals in Surface Impoundments:
Proposed New 35 IL ADM. Code 845

September 30, 2020

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Thank you for this opportunity, public process is an important part of rulemaking and our Democracy. I commend the Illinois EPA for including protections beyond the federal rule in the matter of more frequent groundwater monitoring beyond the 30 years and a health and safety plan for workers. But Illinois can do better.

I live in a transitioning coal community. The Wood River Dynegy plant closed in 2016, there was no industry lead transparency for the workers, residents, or the community during closure or the demolition stage with Commercial Liability Partners. I am part of an advocacy group since 2014, imploring Dynegy and then CLP for transparency and public process with no success. Workers, Municipalities and entities benefitting from taxes were left high and dry.... I wish that was true for the impoundments left behind; beside ground water contamination these impoundment have been threatened by floodwaters several times in the past 10 years, they are adjacent to the Mississippi River and Wood River Creek, coal ash should not be in flood plains, this just makes sense.

No cleanup is complete until ash is no longer exposed to water. Baseline wells for groundwater monitoring must be placed outside of the impacted area, only clean water can establish a true baseline. Coal ash fill and dump sites as well as impoundments must be included in the rule otherwise the problem is not solved. Workers must be protected by limiting exposure to coal ash and it's dust, during handling and transporting. Access to proper PPE and extra dust monitoring must be in place. Rail, barge, or electric or hybrid trucks need to be considered for transportation of the ash.

The rule must use the US EPA's EJ screen and the Clean Power Plan to identify vulnerable communities. Interpreters must be provided at meetings and all literature translated for non-English speaking communities.

A 30-day review is needed for supporting documents, 14 days is not ample time.

Power plants are being closed all over the state, we need a strong rule that keeps everyone safe and holds corporations accountable. I don't want to see a repeat of the Wood River plant. Independent oversight and financial assurances that stay with the property is the only way to make the polluters pay.

Illinois needs to be a leader in strong coal ash protections and not cave to federal rollbacks.

Thank you!

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Uniformity is not nature's way; diversity is nature's way
- Vandana Shiva -