

Comments re: Standards for the disposal of coal combustion residuals in surface impoundments: proposed New 35 IL Admin Code 845.

Thank you for the opportunity to provide comments about the proposed coal ash rulemaking in SB9. I have lived in the Alton area for 70 years, and now have children and grandchildren in this community. As a retired school district employee, I became aware of the large number of children with asthma in our area, and I have a spouse with chronic emphysema, so my concerns are both professional and personal. The Wood River Power plant was a fixture in our community for years, and a source of both employment and a tax base for several local communities. Now recently closed and in demolition, it leaves four coal ash ponds to remain a threat to the nearby Mississippi River and surrounding groundwaters.

Groundwater testing at the Wood River Power plant has confirmed contamination above the safe level set by the EPA for arsenic, boron, molybdenum and sulfate. Groundwater testing should continue for as long as necessary, and this has been a positive aspect of the rule. Because of the dangers of wet coal ash, the rules need to ensure that the ash remains dry. The Illinois rule should prevent any ash from being closed-in-place if it is wet. This protection should also apply to coal ash dumps and coal ash fill. If the ash is removed, the rules should include protections for the workers and surrounding community, to monitor coal ash dust, ensure that the worker's exposure to ash is limited, and that any ash removed is transported in a safe manner. Although there are attempts to weaken these protections in the federal rollbacks, such as allowing temporary ash piles, or unlimited time for excavating ash and adding more ash to unlined ponds, the Illinois Pollution Control Board should not consider these rollbacks.

Power plants and other polluting industries are often located near low-income or minority communities. The rules should guarantee that environmental justice communities be identified and prioritized, and that there be transparency and engagement with the communities, including non-English speaking communities. I am part of a local organization, the Metro East Green Alliance, who attempted to engage with the developer of the Wood River Power plant, to understand and have possible input on the future plans for the site. Multiple efforts of calls and letters were met with no response. This is not acceptable, and the proposed rules need to guarantee that public input should be part of the agency's review process. That public input requires there be transparency and clarity in how the public can meaningfully participate in the process.

Thank you for your consideration of these comments.

Sincerely,

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