

December 11, 2023

via [www.regulations.org](http://www.regulations.org)

Michael Regan  
Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave NW  
William Jefferson Clinton Bldg Room: EPA East Room 1309  
Washington, DC 20004

**Re: New Data Support Urgent Need to Prevent Harm to Human Health from Use of Coal Ash as Structural Fill, Docket ID No. EPA-HQ-OLEM-2020- 0107**

Dear Administrator Regan:

The undersigned 153 groups and 136 individuals demand immediate action by the Environmental Protection Agency (“EPA”) to prevent further serious harm from coal ash (coal combustion residuals or “CCR”) used as fill in residential areas. The EPA’s “Risk Assessment of Coal Combustion Residuals: Legacy Impoundments and CCR Management Units,” (draft), published on November 14, 2023<sup>1</sup> reveals significant new human health risks from coal ash used as structural fill. Therefore, In addition to finalizing a strong Legacy CCR Surface Impoundments Rule,<sup>2</sup> we ask the EPA to take the following actions: (1) quantify the full range of health risks posed by coal ash used as structural fill, particularly the risk from radiation; (2) investigate areas where coal ash fill has been placed near residences and require cleanup; (3) initiate a rulemaking to prohibit the use of coal ash as structural fill; and (4) issue a public advisory recommending that coal ash fill in residential areas be immediately terminated pending a final rulemaking.

We request these urgent steps because EPA’s recently published draft risk assessment found unacceptable cancer and non-cancer risks from exposure to arsenic and radioactivity from coal ash fill.<sup>3</sup> Radioactivity is released from coal ash in subsurface deposits when ash is used as fill. EPA found cancer risks exceeding health standards when coal ash is mixed with soil at ratios that include *very small amounts* of coal ash (1 and 2 percent of the soil mixture).<sup>4</sup> When coal ash constitutes 8 percent of the soil mixture, EPA found cancer risks above 1 in 10,000 – the

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<sup>1</sup> U.S. Environmental Protection Agency, Hazardous and Solid Waste Management System: Disposal of Coal Combustion Residuals From Electric Utilities; Legacy CCR Surface Impoundments, Notice of Data Availability, 88 Fed. Reg. 77,941 (Nov. 14, 2023).

<sup>2</sup> See letter from 160 public interest groups calling for a strong Legacy CCR Surface Impoundments Rule, July 17, 2023, Docket ID No. EPA-HQ-OLEM-2020-0107-0287, available at <https://www.regulations.gov/comment/EPA-HQ-OLEM-2020-0107-0287>.

<sup>3</sup> U.S. Environmental Protection Agency, Risk Assessment of Coal Combustion Residuals: Legacy Impoundments and CCR Management Units (Draft) (Oct. 2023) at Section 6.

<sup>4</sup> *Id.* at 6-10.

threshold for EPA regulation.<sup>5</sup> These findings are alarming because coal ash used as fill is often not diluted nor covered with soil to shield its radioactivity.<sup>6</sup> Thus, for coal ash fills where ash is not mixed with soil or where ash is present at much higher concentrations,<sup>7</sup> cancer risk is likely to be substantially higher for residents living near or on top of these fills.

Second, EPA found unacceptable health risks from arsenic from coal ash fills.<sup>8</sup> While a finding of unacceptable cancer risks from arsenic in coal ash is not new, the finding is significant in light of EPA's draft Integrated Risk Information System (IRIS) Toxicological Review of Inorganic Arsenic published in October 2023.<sup>9</sup> EPA's draft IRIS assessment finds significantly heightened health risks from inorganic arsenic, one of the most common hazardous substances in coal ash and coal ash leachate. In fact, EPA is proposing to raise the cancer potency estimate by 35 times, finding that much smaller amounts of arsenic are carcinogenic. In addition, EPA found an increased risk of heart disease from arsenic ingestion and recommended that the safe daily lifetime dose be 10 times lower than the current value. These findings indicate serious harm from exposure to low levels of arsenic, which in turn raises the risk from exposure to coal ash used as fill.

EPA action is urgently needed. Immense volumes of coal ash have historically been used as fill in the U.S. for more than a century. The American Coal Ash Association ("ACAA") estimates that a total of 180 million tons of coal ash have been used in fill projects throughout the U.S. since 1980.<sup>10</sup> If this coal ash was placed in box cars, the freight train would be long enough to circle the earth. Since most states do not regulate coal ash fill, safeguards are largely absent. Few states prohibit the placement of ash near drinking water wells, homes, or even playgrounds. To make matters worse, the use of coal ash as fill is rapidly increasing. This November, the

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<sup>5</sup> *Id.* Draft Risk Assessment at 6-10. EPA typically relies on a risk to determine when regulation is appropriate. Waste streams for which the calculated high- end individual cancer-risk level is  $1 \times 10^5$  or higher generally are considered candidates for regulation. According to EPA, "waste streams whose risks are calculated to be  $1 \times 10^4$  or higher generally will be considered to pose a substantial present or potential hazard to human health and the environment and generally will be regulated." 80 Fed. Reg. at 21,449.

<sup>6</sup> The EPA assumes there is always sufficient cover on top of structural fill. Draft Risk Assessment at 6-10.

<sup>7</sup> EPA describes CCR structural fill as CCR "used as a substitute for natural materials in the construction of a structural fill." This description implies that coal ash is *substituted* for soil, rather than mixed. *See*, EPA, Frequent Questions about the Beneficial Use of Coal Ash, "What is structural fill?" <https://www.epa.gov/coalash/frequent-questions-about-beneficial-use-coal-ash#t1q7>. Further, EPA's discussion of CCR fills in the preamble to the 2015 CCR Rule does not mention mixing CCR with other materials and discusses placement of volumes of CCR directly on the land, noting the similarity between "large scale structural fills" and CCR landfills. 80 Fed. Reg. 21,349-54. In the preamble, EPA also cites ASTM E277-03, "Standard Guide for Design and Construction of Coal Ash Structural Fills," which clearly describes the practice of using fly ash and bottom ash, without mixing, in engineered fills. Lastly, EPA damage cases involving CCR fills illustrate the practice of CCR placement without soil mixing, including the Gambrills, Maryland fill site and the Battlefield Golf Course in Chesapeake, VA. 80 Fed. Reg. 21,328.

<sup>8</sup> Draft Risk Assessment at 6-10.

<sup>9</sup> Environmental Protection Agency, Availability of the Draft IRIS Toxicological Review of Inorganic Arsenic, 88 Fed. Reg. 71,360 (Oct. 16, 2023).

<sup>10</sup> According to oral testimony of Thomas Adams, President, ACAA, at the EPA Public Hearing for the Phase 2 Proposed Rule in Arlington, VA on October 2, 2019, approximately 180 million tons of CCR has been used for structural fill since 1980. *See also*, ACAA, Coal Combustion Production & Use Reports, 2000 to 2021, *available at* <https://aca-usa.org/publications/production-use-reports/>.

ACAA reported that use of coal ash as structural fill *rose by 40 percent* from 2020 to 2021.<sup>11</sup> Thus the historic and continuing use of coal ash as fill presents substantial risks to human health.

EPA, however, has done almost nothing to investigate and remediate contaminated fill sites or prohibit dangerous practices. The following sites illustrate the continuing threats to human health:

- **Iredell County, North Carolina:** Coal ash from Duke Energy’s Marshall Steam Station was routinely used as structural fill, landscaping and other projects in residential neighborhoods, including 40,000 tons of coal ash near the local high school. The volume of coal ash fill used in this area (the Highway 150 corridor) is the largest documented in the State of North Carolina. The rate of papillary thyroid cancer in Iredell County is 2-3 times higher than the state average, and cancer has stricken dozens of local teenagers. Although ionizing radiation is a scientifically proven environmental link to thyroid cancer,<sup>12</sup> no investigation of coal ash as a source of radioactivity has been conducted, and the coal ash remains near homes and schools.<sup>13</sup>

- **Southeastern Puerto Rico:** From 2004 to 2012, more than 2 million tons of coal ash from the AES Guayama Power Plant were used as fill in dozens of construction projects in southeastern Puerto Rico, including housing, hospital, and road projects.<sup>14</sup> Most sites are located directly above the South Coast Aquifer in the vicinity of public supply water wells, and in some cases ash was placed directly in the aquifer.<sup>15</sup> At dozens of sites, coal ash remains uncovered and close to homes, parks and schools. The Guayama region where the ash was placed is an environmental justice community.

EPA action to remedy these hazardous sites and prevent further dangerous use of toxic coal ash is needed because EPA’s current regulation of coal ash fill is grossly inadequate. There are no restrictions whatsoever on placement of coal ash for volumes less than 12,400 tons. For larger volumes, the lack of enforceable safeguards and oversight is equally disastrous.<sup>16</sup> In most states, coal ash fill can be placed directly next to or under dwellings, drinking water wells, aquifers, and playgrounds. Further, there is often no requirement to even cover the toxic waste.

EPA must immediately protect communities across the nation from the dangerous and unacceptable practice of substituting toxic coal ash for clean soil. At a minimum, we ask EPA to take the following four steps to protect public health:

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<sup>11</sup> ACAA, 2021 Production and Use Survey Results News Release (Nov. 2023), available at <https://aca-usa.org/wp-content/uploads/2022/12/News-Release-Coal-Ash-Production-and-Use-2021.pdf>.

<sup>12</sup> Lisa Sorg, “Duke U. scientists to focus on radon, coal ash, flame retardants in Iredell thyroid cancer cluster probe,” NC Newsline, March 22, 2019, <https://ncnewsline.com/2019/03/22/duke-u-scientists-to-focus-on-radon-coal-ash-flame-retardants-in-iredell-thyroid-cancer-cluster-probe/>

<sup>13</sup> In some areas the coal ash is uncovered. *See*, Lisa Sorg, NC Newsline, Coal ash sinkhole expands in Mooresville, contaminating stream while legal dispute delays cleanup, June 28, 2023, available at <https://ncnewsline.com/2023/06/28/coal-ash-sinkhole-expands-in-mooresville-contaminating-stream-while-legal-dispute-delays-cleanup/>

<sup>14</sup> 84 Fed. Reg. at 21,328.

<sup>15</sup> 80 Fed. Reg. at 21,329.

<sup>16</sup> 40 C.F.R. § 267.53.

- (1) Quantify the health risks via inhalation and ingestion posed by the use of coal ash as structural fill, particularly the risk from exposure to radiation;
- (2) Investigate areas where coal ash fill has been placed near residences and require cleanup;
- (3) Initiate a rulemaking to prohibit the use of coal ash as structural fill; and
- (4) Issue a public advisory recommending that coal ash fill in residential areas be immediately terminated pending a final rulemaking.

Thank you for considering this urgent request to protect the health of vulnerable communities nationwide from dangerous placement of toxic coal ash. We also thank you for moving expeditiously to finalize a strong Legacy CCR Surface Impoundments Rule.

Respectfully submitted,

Jose Cora  
Acción Social Y Protección Ambiental  
Salinas, Puerto Rico

Bonnie Little  
Atrium  
Cornelius, NC

Kyle Crider  
Alabama Interfaith Power & Light  
Birmingham, AL

Angela Mummaw  
Austin Peay State University  
Woodlawn, TN

Cindy Lowry  
Alabama Rivers Alliance  
Birmingham, AL

Usman Mahmood  
Bayou City Waterkeeper  
Houston, TX

Riki Ott  
ALERT, A Project of Earth Island Institute  
Berkeley, CA

Charles Scribner & Katie Holmes  
Black Warrior Riverkeeper  
Birmingham, AL

David Levine  
American Sustainable Business Council  
Washington, DC

Therese Vick  
Blue Ridge Environmental Defense League  
Clayton, NC

Edmund Poirier  
Apopka Cancer Cases  
Apopka, FL

Joshua Perkins  
BM4F  
Memphis, TN

Brianna Knisley  
Appalachian Voices  
Boone, NC

Lisette Van Vliet  
Breast Cancer Prevention Partners  
San Francisco, CA

Dean Wilson  
Atchafalaya Basinkeeper  
Plaquemine, LA

Soledad Haren  
Build A Better Planet  
New York City, NY

Myra Crawford  
Cahaba Riverkeeper  
Birmingham, AL

Lori Dalton & Jill Kelly  
Cancer Cluster Army NC  
 Mooresville, NC

Kemp Burdette  
Cape Fear River Watch  
Wilmington, NC

Tracy Meints Fox  
Central IL Healthy Community Alliance  
Peoria County, IL

Lorna Paisley  
CARE  
Lake Balboa, CA

Joseph Conn  
Chair, Northwest Indiana Green Party  
Hobart, IN

Jane Conroe  
Chautauqua-Conewango Consortium  
Warren, PA

Mary Jadernak  
Chicago Conservation Corp  
Chicago, IL

Michael William Mullen  
Choctawhatchee Riverkeeper  
Troy, AL

Kerwin Olson  
Citizens Action Coalition of IN  
Indianapolis, ID

Mary Ellen DeClue  
Citizens Against Longwall Mining  
Litchfield, IL

Ellen Rendulich  
Citizens Against Ruining the Environment  
Lockport, IL

Christine Main  
Citizens for a Greener Illinois  
Champaign, IL

Johnny Bowden & Sharon Martin  
Claxton Community  
Clinton, TN

Celeste Flores & Dulce Ortiz  
Clean Power Lake County  
Waukegan, IL

Jennifer Peters  
Clean Water Action  
Washington, D.C.

Víctor Alvarado Guzmán  
Comité Diálogo Ambiental  
Salinas, Puerto Rico

Clark Bullard  
Committee on the Middle Fork  
Vermilion River, IL

Aldwin Colón & Erasmo Cruz  
Comunidad Guayamesa Unida Po Tu Salud  
Guayama, Puerto Rico

Nancy Moldenhauer  
Concerned Citizen and City Councilperson Elect  
Michigan City, IN

Sandra D. Lipe  
Concerned Citizen of Lake Norman/Mooresville  
NC  
Mooresville, NC

Justinn Overton  
Coosa Riverkeeper  
Mt Laurel, AL

Steven Pulliam  
Dan Riverkeeper  
Madison, NC

Germaine B Light  
DNA  
Danville, IL

Mary Gutierrez  
Earth Ethics, Inc.  
Pensacola, FL

Lisa Evans  
Earthjustice  
Marblehead, MA

Marda Kirn  
EcoArts Connections  
Boulder, CO

Lan Richart & Pamela J. Richart  
Eco-Justice Collaborative  
Champaign, IL

Tara Thornton  
Endangered Species Coalition  
Washington, D.C.

Sheree Martin  
Energy Alabama  
Huntsville, AL

Abel Russ  
Environmental Integrity Project  
Washington, D.C.

Jennifer Barbini  
Coral Springs, FL

Beth Lambert  
Epidemic Answers  
Windsor, CT

Yolanda Whyte, MD  
Ethical and Respectful Treatment of Humans  
Atlanta, GA

Stel Bailey  
Fight for Zero  
Cocoa, FL

R. John Dawes  
Foundation for Pennsylvania Watersheds  
Alexandria, PA

Yvonne Taylor  
Gas Free Seneca  
Watkins Glen, NY

Codi Norred  
Georgia Interfaith Power and Light  
Decatur, GA

Lesley Pacey  
Government Accountability Project  
Point Clear, AL

Jasmine Guevara  
Green 2.0  
San Diego, CA

Todd Larsen  
Green America  
Washington, D.C.

Maritza Mendoza  
GreenLatinos  
Washington, DC

Lynn Nadeau  
HealthLink, Inc.  
Swampscott, MA

Teresa L McGrath  
Healthy Building Network  
Washington, D.C.

Henry Saul Cole, Ph.D.  
Henry S Cole & Associates, Inc.  
Upper Marlboro, MD

Connie Wachala  
Highland Neighbors for Sustainability  
Highland, IN

Indra Frank  
Hoosier Environmental Council  
Indianapolis, IN

Dan Shapley  
Hudson Riverkeeper  
Ossining, NY

John L Wathen  
Hurricane Creekkeeper  
Tuscaloosa, AL

Angela Nelson Deutch  
I & D Squared Consulting  
Michigan City, IN

Rep. Patricia A. Boy  
Indiana House of Representatives  
Michigan City, IN

April Valentine  
Indiana Poor People's Campaign  
Hammond, IN

Rodney Pol, Jr.  
Indiana State Senate  
Chesterton, IN

Tiffany Hartung  
Interfaith Power & Light  
Washington, D.C.

Dallas Slagle  
Izaak Walton League of America/Harry Enstrom  
Chapter  
Clarksville, PA

Kristine Kysel, Ashley Williams & Nancy Walter  
Just Transition Northwest Indiana  
Michigan City, IN

Mary Clark  
Justice For OTSEGO  
Chicago, IL

Chet L. Hunt  
Knox Climate Watch  
Knoxville, TN

Brady Watson  
Knoxville DSA  
Knoxville, TN

Ramón Pérez  
La Trenza & GreenLatinos  
Toledo, OH

Patricia Schuba  
Labadie Environmental Organization  
Labadie, MO

Sandy Bihn  
Lake Erie Waterkeeper  
Toledo, OH

Jason J Burns  
Last Call Foundation  
Boston, MA

Lizzy Duncan  
League of Conservation Voters  
Washington, D.C.

Terry R. Miller  
Lone Tree Council  
Bay City, MI

Xavier Barraza  
Los Jardines Institute  
Albuquerque, NM

Delfina Anchondo  
Lytle Ranch Moapa NV Community  
Madison, WI

Yolonda Spinks & Kimberley L Davis  
Memphis Community Against Pollution  
Memphis, TN

Laurene Allen  
Merrimack Citizens for Clean Water  
Merrimack, NH

Toni Oplt  
Metro East Green Alliance  
Edwardsville, IL

Beverly Mack-Martin  
Midwest Minority Energy Consortium  
Michigan City, IN

Andrea Jahnz-Davis  
Michigan City Sustainability Commission  
Michigan City, IN

Cheryl Nenn  
Milwaukee Riverkeeper  
Milwaukee, WI

Charles Miller  
Missouri Confluence Waterkeeper  
St. Louis, MO

Cade Kistler  
Mobile Baykeeper  
Mobile, AL

Kathleen A. Curtis, LPN  
Moms for a Nontoxic New York (MNNY)  
Albany, NY

Anne Hedges & Derf Johnson  
Montana Environmental Information Center  
Helena, MT

Jaime Gatton  
Mooresville Scoop  
Mooresville, NC

Gray Jernigan  
MountainTrue  
Asheville, NC

Rebecca Hammer  
Natural Resources Defense Council  
Washington, D.C.

Mariel Nanasi  
New Energy Economy  
Santa Fe, NM

Chris Nidel, MS, JD  
Nidel & Nace, PLLC  
Rockville, MD

Jerry Rivers  
North American Climate, Conservation and  
Environment (NACCE)  
Roosevelt, NY

Edward Barta  
Northern Plains Resource Council  
Billings, MT

Gregory Remaud  
NY/NJ Baykeeper  
Hazlet, NJ

Willard Tillman  
Oklahoma Black Historical Research Project, Inc.  
Oklahoma City, OK

Charley Howell  
Operation Spring Plant, Inc.  
Oxford, NC

Dorathy E Barker  
Operation Spring Plant, Inc  
Oxford, NC

Paul Kysel  
PINES (People In Need of Environmental Safety)  
Michigan City, IN

Susana Almanza  
PODER  
Austin, TX

Betsy Nicholas  
Potomac Riverkeeper Network  
Washington, DC

Andrew Rehn  
Prairie Rivers Network  
Champaign, IL

Sarah Houston  
Protect Our Aquifer  
Memphis, TN

Kristin Camp  
Protect the Middle Fork Citizens Advocacy Group  
Collison, IL

Bill Schultz  
Raritan Riverkeeper  
Keasbey, NJ

Ariana Wyatt  
Red Hill- Hawai'i  
Prattville, AL

Kathryn Dean  
Reed the Music  
Mooresville, NC



Ronald H. White, M.S.T.  
RH White Consulting  
Castleton, VA

Kimberly P. Owens  
Rite Lite Signs  
Concord, NC

Lorette Picciano  
Rural Coalition  
Washington, D.C.

Diane Wilson  
San Antonio Bay Estuarine Waterkeeper  
Seadrift, TX

Tonya Bonitatibus  
Savannah Riverkeeper  
Augusta, GA

Phillip Kohler, Ryan Metz & Em Racine  
Save the Dunes  
Michigan City, IN

Chase Lindemann  
Save the Sound  
New Haven, CT

Joseph Campbell  
Seneca Lake Guardian  
Watkins Glen, NY

Mark Szabo  
SHI  
Parlin, NJ

Jonathan Levenshus & Bridget Lee  
Sierra Club  
Washington, DC

Frank S. Holleman  
Southern Environmental Law Center  
Greenville, SC

Virginia Richard  
SouthWings  
Asheville, NC

Marquita Bradshaw  
Sowing Justice  
Memphis, Tennessee

Carmen San Juan  
St. Therese Catholic Church  
 Mooresville, NC

Willa Faye Moore  
Sustainability Commission/ Laporte County  
NAACP  
Michigan City, IN

Austin Sauerbrei  
Statewide Organizing for Community  
Empowerment  
Knoxville, TN

Cari Begin  
Stealth Products, LLC  
Roswell, GA

Diane Cotter, Theresa James & Dianne M Latiolais  
Team Taylor  
Rindge, NH

Virginia Farah  
Team Taylor Wind  
Princeton, NJ

David Whiteside  
Tennessee Riverkeeper  
Decatur, AL

Juan Parras  
Texas Environmental Justice Advocacy Services  
Houston, TX

Raymer Maguire  
The CLEO Institute  
Miami, FL

Kyle Crider  
The People's Justice Council  
Birmingham, AL

Heather Hulton VanTassel  
Three Rivers Waterkeeper  
Pittsburgh, PA

Melissa Green  
Thyroid Cancer Coal Ash Victim  
Denver, NC

Chili Yazzie  
Toohnii Binahneest'a' Altaas'ei Alliance  
Shiprock, NM

Geof R. Benson  
Town of Beverly Shores  
Beverly Shores, IN

Kendall Wimberley  
Toxic Free North Carolina  
Durham, NC

Kenneth Aud  
United Congregations of Metro-east  
Granite City, IL

Larry Evans  
United Congregations of Metro East  
Glen Carbon, IL

Monica E. Unseld, Ph.D, MPH  
Until Justice Data Partners  
Louisville, KY

Pamela Digel  
Upper Allegheny Riverkeeper  
Bradford, PA

Robin Miner  
Indianapolis, IN

Daniel E. Estrin  
Waterkeeper Alliance  
New York, NY

Robin Broder  
Waterkeepers Chesapeake  
Takoma Park, MD

Evelyn Alvarez  
West Lawn Conservation Club  
Chicago, IL

Cindy Rank  
West Virginia Highlands Conservancy  
Charleston, WV

Antonia Zais  
Western Maryland Regional GIS Center  
Frostburg, MD

Sarah Hunkins  
Western Organization of Resource Councils  
Billings, MT

Edgar Miller  
Yadkin Riverkeeper  
Winston-Salem, NC

Chauncey Moran  
Yellow Dog Watershed Preserve  
Big Bay, MI

Ennedith Lopez  
Youth United for Climate Crisis Action  
Albuquerque, NM

Allison Harris  
 Mooresville, NC

Allison Klein  
Ormond Beach, FL

Alyette Keldie  
Cornelius, NC

Amanda Bettencourt  
Charlotte, NC

Amber Hagedorn  
 Mooresville, NC

Amy Androliakos  
Charlotte, NC

Ann Strange  
Knoxville, TN

Ava Dandurand  
 Mooresville, NC

Axel Ringe  
New Market, TN

Bernard A. Ready  
Chelmsford, MA

Brian M Kurtz  
Coppell, TX

Bridgette Murray  
Gary, IN

Brittania Corbit  
 Mooresville, NC

Cameron Sullivan  
Clemmons, NC

Camilla da Rosa  
 Mooresville, NC

Candace Corson, M.D.  
Indianapolis, IN

Carol Ready  
Chelmsford, MA

Caroline Joos  
 Mooresville, NC

Carolyn Wolfsie  
Apex, NC

Cathi Murray  
Town of Pines, IN

Cathie Bird  
Pioneer, TN

Catina Farah  
Coconut Creek, FL

Caylin Mena  
 Mooresville, NC

Cecil Rich  
Solsberry, IN

Charles Cohen  
Huntsville, AL

Chris Simrell  
 Mooresville, NC

Christie Driscoll  
Charlotte, NC

Cindy B. Zimmerman  
St. John's, FL

Cindy Tognarina  
 Mooresville, NC

Cristen Hooper  
St. Johns, FL

Dana Laurita  
Charlotte, NC

David Jens Thomas Pedersen  
Saanichton, British Columbia

David Wind  
St Johns, FL

Debra Kurtz  
Coppell, TX

Donald David Briggs  
Michigan City, IN

Donna Marinelli  
 Mooresville, NC

Donnis Finet  
Williamston, SC

Dora Carter  
Sherrills Ford, NC

Eddie H. Moore, Jr  
Michigan City, IN

Edyta Komorek  
Colonia, NJ

Eleanore Hartman  
Michigan City, Indiana

Erin Garrett  
Huntersville, NC

Esther Sewell  
Clinton, TN

Evelyn Delgado  
Sherrills Ford, NC

Gary R. Hargett  
Myrtle Beach, SC

Gerald A Thornton  
Farragut, TN

Gregory W Kalosieh  
Knoxville, TN

Grey Huddleston  
 Mooresville, North Carolina

Heather Martelli  
 Mooresville, NC

Holly Adams  
 Mooresville NC

Jacquelyn Satterwhite  
 Mooresville, NC

Jane Wind  
 Boca Raton, FL

Janet Galliher  
 Statesville NC

Janet Lund  
 Mooresville, NC

Jason Lukas  
 Beverly Shores, IN

Jeffery Szabo-Simmons  
 Margate, FL

Jennifer Andreyev  
 Point Pleasant, NJ

Jennifer Klein  
 Coconut Creek, FL

Jennifer Temple  
 Mooresville, NC

Jillian Coffey  
 Huntersville, NC

Jodi Whalen  
 Winston Salem, NC

Joe Franklin  
 Johnson City, TN

John Walsh  
 Champaign, IL

Julie Bledsoe  
 Movie, TN

Julie Miller  
 Mooresville, NC

Karen Moore  
 Clinton, TN

Karen Szabo  
 Piscataway, NJ

Katherine Wurm  
 Sherrills Ford, NC

Kathleen Stevens  
 Mooresville, NC

Kathy Selvage  
 Wise, VA

Katie Foley  
 Stanley, NC

Kelly Ann Wiechers  
 Davidson, NC

Kelly Greene  
 Mooresville, NC

Kelsey Ligon  
 Brownsburg, IN

Kennedy Davis  
 Sharpsville, IN

Kenneth Lynn Jobe  
 Nashville, TN

Kenneth Wind  
 Boca Raton, FL

Kent Minault  
 Knoxville, TN

Kerri Berryman  
Charlotte NC

Kerry DellaCava  
Parkland, FL

Kristen Noonan  
Michigan City, IN

Kristen M. Sutek  
Cornelius, NC

LeighAnn Huddleston  
 Mooresville, North Carolina

Leslie Detiveaux  
 Mooresville, NC

Leslie Kwait  
Denver, NC

Lisa Blehar  
Bradenton, FL

Lisa Givens  
Iron Station, NC

Lisa Jahnke  
Suffolk, VA

Liz Fackelman  
Davidson, NC

Liz Halter  
Davidson, NC

Lois Kain  
Urbana, IL

Luz Beagan  
Tinton Falls, NJ

Maggie Longmire  
Knoxville, TN

Marc Lafferty  
Doylestown, PA

Margarita Slade  
Saint Johns, FL

Maria Garber  
Huntersville, NC

Maria Kuthy  
 Mooresville, NC

Maria McDonough  
 Mooresville, NC

Maria Phonchamreun  
Concord, NC

Marianne Shiple  
Boulder, CO

Maribeth ONeil  
Michigan City, IN

Marie Palma  
 Mooresville, NC

Martha J. Pierce  
Gatlinburg, TN

Mary Beth Wood  
Salisbury, NC

Mary Jane Vanderstar  
Florence, AZ

Mary Smith  
Stanley, NC

Melissa Kennelly  
Waxhaw, NC

Melissa C. Powell  
 Mooresville, NC

Meredith Wilson  
O'Fallon, IL

Michelle Sudol  
 Mooresville, NC

Mike Blanchard  
 Mooresville, NC

Myra Galindo  
Boulder, CO

Nancy Muse  
Florence, AL

Nicole Ladowski  
 Mooresville NC

Nicole Saulsberry  
Springfield, IL

Oleta Lee  
 Mooresville, NC

Philip Toman  
Davie, FL

Rachel Campbell  
 Mooresville, NC

Rachel Jacobsen  
 Mooresville, NC

Richard Farah  
Coconut Creek, FL

Randal Graham  
Knoxville, TN

Rosemary Ready Moulton  
Derry, NH

Rudy Gallegos  
Munster, IN

Shannon Swain  
Denver, NC

Sharon Riley  
 Mooresville, NC

Sierra Michelle Williams  
Columbus, IN

Steph Reilly  
 Mooresville, NC

Stephanie Nixdorf  
Davidson, NC

Susan Ramanata  
Huntersville, NC

Susan Wind  
 Mooresville, NC

Tim Maloney  
Nashville, IN

Todd Waterman  
Clinton, TN

Tracy L Hipple  
 Mooresville, NC

W. Faye Moore  
Michigan City, IN