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M/S 58-247A
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Re: Draft Environmental Impact Statement for the Gilberton Coal-to-Clean Fuels and Power Project
(DOE/EIS-0357)

Dear Ms. Bell,

As a citizen of Schuylkill County, PA, the site of the proposed Gilberton Coal-to-Clean Fuels and Power Project, I am writing to share my concerns about this project.

Aesthetics:

The Environmental Impact Statement (EIS) states (page 4-1):

“As part of the proposed facilities, five 200-ft stacks and one 300-ft stack would be constructed. The five 200-ft stacks would be considerably shorter than the existing 326-ft stack at the adjacent Gilberton Power Plant, and the 300-ft stack would be slightly shorter. The new gasifier and turbine buildings would be similar in size to the existing power plant buildings. Consequently, the proposed facilities would appear as an extension of the existing industrial character of the locale rather than as an appreciable change in character.”

Schuylkill County's economy has, over time, moved from a mining-centric to manufacturing-centered and, most recently, an economy supported by prisons and landfills, essentially the detritus of other, more affluent areas that can afford to discard their unwanted felons and physical garbage to a blighted, poorer area of the country. If Schuylkill County can ever transform itself from an economy based on industries other areas don't want to a more modern, thriving economy prepared for the challenges of the 21st century, the first step toward a more prosperous future would not be to perpetuate an already blighted landscape. Six additional smokestacks do nothing for improving the aesthetics of a region already scarred by landfills, prisons, and the residuals of decades of mining (while the proposed plant purports to address these mining residuals by removing culm piles, the environmental cost of the plant may exceed the aesthetic benefits).

Air pollutants:

The EIS page 4-8 states:

“the contribution of an individual source to O3 concentrations at any particular location cannot be readily quantified.”

Are you saying that there is no way to predict the amount of ozone the plant will produce?

The EIS page 4-9 states:

“a high percentage of hazardous air pollutants and trace elements in the synthesis gas would be removed, but no estimates of the proposed facilities' emissions of these pollutants are currently

available. Part of the purpose of the proposed project is to generate environmental data, including hazardous air pollutant measurements, from the operation of the integrated technologies at a sufficiently large scale to allow industries and utilities to assess the project's potential for commercial application (Section 1.4)."

I find this statement particularly disturbing. It essentially says you will remove a high percentage of an unknown value of pollutants. This leaves an unknown value of pollutants released into the atmosphere, which could be considerable, as we only know it's a percentage of an unknown quantity. Schuylkill County **CANNOT** be a guinea pig "at a sufficiently large scale to allow industries and utilities to assess the project's potential for commercial application." This is an **unacceptable risk** to the health of area residents and the long-term viability of the local environment.

The EIS page 4-11 states:

"The proposed facilities would increase global CO2 emissions by about 832,000 tons per year, which is about 0.003% of global CO2 emissions of 26,713 million tons resulting from fossil fuel combustion in the year 2000. Thus, increases from the proposed facilities would be large in terms of number of tons per year but small in comparison with global totals."

Of course, if we compare a value to a global value, it's going to seem tiny in comparison. Regardless, close to 1 million tons of CO2 emissions is a HUGE number. Global warming is a global problem, the effects of which are starting to be felt in our own country – witness Hurricane Katrina's devastation in late 2005. While the United States has 4% of the world's population, it produces 22% of the world's greenhouse gas emissions (source: <http://www.stopglobalwarming.org/learn/>). In the forward to the report of a conference hosted by the UK Meteorological Office in February 2005, British Prime Minister Tony Blair said "it is now plain that the emission of greenhouse gases... is causing global warming at a rate that is unsustainable." (Source: <http://news.bbc.co.uk/2/hi/science/nature/4660938.stm>).

Mineral pollutants:

While the proposed plant would utilize culm from existing banks, thereby purporting to aid in the aesthetic cleanup of the area, the existing Gilberton Coal Plant already is utilizing culm in its operations. An additional plant utilizing culm seems to create more environmental issues that are not offset by the possible acceleration of culm cleanup.

Water resources:

The EIS states on pages 4-15/16:

"Most of the iron, manganese, and other metals would probably be removed from this wastewater stream during processing (these substances would be incorporated into wastewater sludge), but sulfate and other anions could pass untreated into the wastewater discharge."

Isn't this a little ambiguous? Can you define "most"?

Social and Economic Resources:

With the recent controversy surrounding the construction of a Wal-Mart distribution center in the area and its employment of illegal aliens, what measures will be taken to ensure that all employees used in construction and day-to-day operation of the proposed plant are legally employed US citizens?

As the project is located in a Keystone Opportunity Zone, it would not pay local property taxes until 2014, generating no revenue for the local economy but taking full advantage of police and fire protection and other local resources. This is unfortunate for a facility that will potentially generate considerable income for its financiers.

Solid waste:

One of the byproducts of plant operation would be gasifier slag, in the amount of 1600 tons per day (wet weight). While commercial uses may be sought, the EIS states (page 4-29): "markets for this material

have not yet been established. Any slag that is not used commercially would be used as fill material for surface mine reclamation at and near sites where culm would be obtained.” If the net effect of this plant is trading one form of environmental waste (culm) for another (slag), the net aesthetic effect is negligible.

The EIS page 4-30 states:

Ash leachate concentrations of all constituents except aluminum, antimony, arsenic, lead, and sulfate were also below the applicable drinking water Maximum Contaminant Level Goal (MCLG) or primary or secondary drinking water standards (for substances without MCLGs). Due to the physical differences between slag and ash, leaching of slag from the proposed facilities would be expected to result in much lower contaminant concentrations. Thus, the risk of adverse impacts to groundwater quality from using this material in mine reclamation would be negligible.

This statement again seems a little ambiguous. “Leaching ... *would be expected...*” – what does this mean? What if the expectation proves false? How will the plant owners be held accountable and responsible for cleanup of groundwater and associated health expenses for area residents affected by contaminated groundwater?

Miscellaneous

What guarantees are provided that construction companies and employees will follow all environmental laws and recommendation mentioned or discussed in the EIS? How often with EPA officials inspect construction activity? What recourse does the EPA and/or local and state government have for violations of regulations and recommendations?

Conclusion

While I appreciate the need to discover alternative fuel sources, they cannot be at the risk of the environment, both locally and globally, nor seriously impact the health of local citizens. Federal tax dollars are better spent researching more environmentally friendly energy alternatives, like solar energy or wind farms. As such, I am asking that the DOE not provide funding for this project.

Sincerely,

Daryl Davis