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(Sent via e-mail to jbell@netl.doe.gov)

Dear Ms. Bell:

I write regarding the Draft Environmental Impact Statement for the WMPI coal-to-oil operation planned near Gilberton, Pa. I live in North Carolina but am a native of Schuylkill County with family living in the local communities of Shenandoah, Minersville, Hometown and Tamaqua. I'm also a reporter who has long been concerned about the enormous amount of toxic pollution being emitted into the area's environment, and I recently launched a Web site to document the problem at [www.hometownhazards.com](http://www.hometownhazards.com).

Because the WMPI will significantly increase the already-enormous toxic burden borne by Schuylkill County residents, I urge the U.S. Department of Energy not only to withhold funding for the project but to do whatever it can to keep the facility from being constructed.

The WMPI operation will dump pollution to the air from six emissions stacks and from storage tanks, which reportedly are expected to leak more than a ton of volatile diesel and naphtha each year. The state Department of Environmental Protection is permitting the operation to annually dump 100 tons -- 200,000 pounds -- of the criteria air pollutants sulfur dioxide, nitrogen oxides, carbon monoxide and fine particulate matter into the atmosphere. The DEP would also allow the facility to release 100,000 pounds of volatile organic compounds and 200,000 pounds of ammonia. Furthermore, the plant is expected to emit annually more than 30 pounds of highly toxic and bioaccumulating mercury.

The DEIS notes that the "air permit for the proposed facilities establishes maximum allowable limits for total facility emissions of less than 10 tons for any single hazardous air pollutant and less than 25 tons altogether for any combination of hazardous air pollutants during any consecutive 12-month rolling period." Less than 10 tons? Does the DOE somehow think it's comforting to area residents to know the facility is allowed to release up to 20,000 pounds of a poison such as benzene in a given year?

The toxic emissions coming out of the WMPI operation would join those already being released by numerous other industrial facilities throughout the county. For example, the nearby Gilberton Power Co. -- a waste-coal-burning power plant operated by WMPI partner John W. Rich, Jr. -- reported releasing to the air in 2003 alone 153,410 pounds of hydrochloric acid, 22 pounds of barium compounds, 10 pounds of manganese, 4 pounds each of lead and zinc compounds and 3 pounds of chromium compounds, according to the facility's latest Toxic Release Inventory. In nearby Shenandoah, the St. Nicholas Cogeneration plant in 2003 reported emitting 4,795 pounds of zinc fumes/dust, 500 pounds each of manganese and barium, 255 pounds of chromium, 20 pounds of lead, and 10 pounds each of arsenic, copper and nickel.

In nearby Frackville, the Wheelabrator waste-coal plant in 2003 reported dumping to the air 55,262 pounds of hydrochloric acid, 8 pounds of barium, 2 pounds of manganese, and 1 pound each of arsenic, chromium, copper, lead, nickel and vanadium. To the west in Tremont, the WPS Westwood waste-coal plant in 2003 reported releasing 4,500 pounds of sulfuric acid, 3,400 pounds of hydrochloric acid, 264 pounds of vanadium, 112 pounds of zinc, 97 pounds of manganese, 74 pounds of barium, 72 pounds of chromium, 53 pounds of lead, 41 pounds of copper, 36 pounds each of mercury and nickel, and 33 pounds of hydrogen fluoride. (That marked a big decline from Wheelabrator's previous year's releases of 11,000 pounds of hydrochloric acid, 9,802 pounds of chromium, 5,500 pounds of hydrogen fluoride, 4,700 pounds of sulfuric acid, 3,014 pounds of barium, 1,302 pounds of manganese, 834 pounds of vanadium, 251 pounds each of copper and zinc, and 147.9 pounds of lead.) Further east near Hometown, the Northeastern Power waste-coal-fired plant in 2003 released to the air 81,203 pounds of hydrochloric acid, 16,062 pounds of hydrogen fluoride, 509 pounds of barium, 119 pounds of manganese, 92 pounds of lead, and

1 pound of mercury.

And waste-coal-burning power plants are not the only facilities polluting Schuylkill County's air, according to 2003 TRI data. Alcoa Extrusions in Cressona released to the air 84,079 pounds of hydrochloric acid, 50 pounds of chromium, 46 pounds of lead, 40 pounds of manganese and 17 pounds of copper. Tredegar Film Products in Marlin - - 29,094 pounds of ozone. Air Products near Hometown -- 5,352 pounds of hydrogen fluoride, 4,655 pounds of dichloromethane, 3,059 pounds of chloroethane, 1,000 pounds of ammonia, 500 pounds of hydrochloric acid, 255 pounds of acetonitrile, and 5 pounds each of boron trichloride and fluorine. Silberline Manufacturing in Hometown - - 4,323 pounds of 1,2,4-trimethylbenzene and 500 pounds of aluminum. GHM Inc. in Orwigsburg -- 6,204 pounds of styrene. Schuylkill Products in Cressona -- 250 pounds each of chromium, manganese and nickel and 9 pounds of lead. Goulds Pumps in Ashland -- 671 pounds of copper, 136 pounds of chromium, 63 pounds of manganese and 12 pounds of nickel.

For 2003 alone, that's a total of 462,360 pounds of toxic chemicals dumped to Schuylkill County's air. Among these chemicals are a number of recognized carcinogens, neurotoxins, and reproductive and developmental poisons.

What's the total cumulative impact of these releases on human health year after year? How do all these chemicals interact with each other in the human body? What would be the impact of adding the releases from a highly polluting coal-to-oil operation?

Furthermore, how do these air emissions interact with toxic exposures from other sources of pollution, such as Superfund toxic waste sites? Schuylkill County has one Superfund site currently on the National Priorities List -- Eastern Diversified Metals in Hometown, where contaminants of concern include polyvinyl chloride, PCBs, dioxin and lead. The county also has two Superfund sites that have been deleted from the NPL -- Metropolitan Mirror and Glass in Frackville, where contaminants include silver solutions, paint strippers and thinners, and solvents; and McAdoo Associates in Hometown, where more than 6,000 barrels of numerous toxic chemicals (including beryllium from a DOE contractor) were dumped into an old coal mine.

Health studies of those sites conducted by the federal Agency for Toxic Substances and Disease Registry downplayed the possibility of human exposure, but area residents were in fact exposed to contaminants from the Eastern Diversified site through massive fires that burned there on occasion from the late 1960s through the late 1970s -- blazes that sent massive clouds of dioxin-tainted black smoke billowing over the area. One of the fires burned for two weeks. And Hometown-area residents and local leaders are currently pursuing studies to determine whether contamination from the McAdoo Associates site may have migrated into area wells and the Tamaqua municipal water supply. Hometown lies downwind of the waste-coal plants as well as the proposed coal-to-oil plant. If people in that area are indeed drinking and bathing in contaminated water, how would they be affected by additional air pollution above and beyond the enormous amount they're already exposed to?

Has a decision been made by regulators to concentrate filthy industry in this area? If so, residents should be informed about it -- and compensated.

I also ask that the DOE consider whether the state can properly regulate the WMPI operation. When one visits the WMPI project Web site at [www.ultracleanfuels.com](http://www.ultracleanfuels.com), the state of Pennsylvania is listed as a project participant. How can the state both participate in promoting and objectively regulate a polluting industrial operation? It seems to be a fundamental conflict of interest.

Thank you for considering my concerns. If you have any questions, please do not hesitate to contact me.

Sincerely,  
Sue Sturgis