

Mahanoy Creek Watershed Association



... working to restore and protect Mahanoy Creek

420 Dutchtown Road
Ashland, PA 17921

February 8, 2006

Dear Ms. Bell,

Please accept these comments on behalf of the Mahanoy Creek Watershed Association.

In section 3, on the Existing Environment, under 3.1.3, it is stated that there are several other power plants within a 20-mile radius of the proposed coal to oil plant and that the winds come in a W, or SW direction running parallel to the ridges and valleys in the area. That being stated, and as this project is of epic proportions and funded largely by tax dollars, it would be in the best interests of all parties living in the area who may be recipients of toxic outfall, to perform a serious study of airborne pollutants. Attainment status for NAAQS should be gleaned from monitoring stations located within the proposed direction of winds blowing W – SW along the northeast trending linear ridges and valleys. In addition, cumulative pollutant loadings from existing facilities should be considered.

On page 3-7, it is stated that there are pillars of coal holding the coal shafts up. Anyone with any knowledge of historic local mining practices knows that it was a common practice to “rob the pillars” as a method of extracting the most coal from the mine. This has severely compromised structural integrity of the “mine rooms”. Dewatering of mine pools at the rate suggested by WMPI should be a serious concern, as it is likely to lead to mine subsidence, as the water helps support structures above the “mine room”, which includes private residences. In addition, the mapping of old mine workings is inaccurate; many miners and companies did not adequately record tunneling efforts. The potential for geologic hazards (4-1.3.3) are likely with the proposed removal of mine pool water and the unpredictable structure of underground mine workings

The USGS, under the capable direction of Dr. Charles Cravotta, did a Watershed Assessment for MCWA. It is completed and should be reviewed by your office before any work commences on this project. On page 3-12, it is stated that the water is acidic. A quick look over Attachment 1 will contradict this statement.

With regard to the statement on 3-12 that aquatic life is severely diminished, please refer to Attachment 2.

On page 3-16, it is stated that the mine pool water has an iron content of 30 mg/L, which is much higher than that found in the creek. As remediation efforts have been planned for the Mahanoy Creek, it seems counterproductive to add more iron to water as we are trying to remove it through various projects. In addition, varying chemistry of pumped mine pool water is unacceptable.

On page 3-20, it is stated that aquatic life is absent or severely reduced. Attachments 1 and 2 are in direct contradiction to that statement.

On page 4-15, it is stated that the only in-stream uses for the Mahanoy Creek are to receive treated sewage and that no impacts on water quality should be expected. That statement shows a total disrespect for the efforts of our organization and the remediation efforts we have historically been attempting. "Probably" removing pollutants is unacceptable. It is apparent from the discussion on page 4-16 that the wastewater is destined to become yet another nonpoint source of pollution in the creek.

The statement that adverse effects from the operation of the coal to oil plant would be undetectable because of the existing pollution in the creek is unacceptable. Human exposure to any toxins is unavoidable as we are in the creek throughout the year doing various cleanups. If it is necessary, I will provide news articles to that effect.

In conclusion, the proposed plant may provide jobs for the short term, but the long-term environmental impacts are likely to be severe, with negative impacts on the health of the surrounding communities for decades to come. The people of Schuylkill County have paid the price for our nation's industrialization, with lost lives, scarred mountains and polluted streams. We have received no thank yous from anyone for our sacrifices, only a demand to endure more for the sake of short-term progress. Certainly, the btu value of culm banks will not sustain the plant for 25 years; what WILL be the btu source when the culm is gone or needs enhancement? How can this plant improve the lives of an area rife with poverty, except for the few construction jobs it will bring? One last note, the "union forever" battle cry is weak, as Mr. Rich busted the UMWA in the mid 80s at his Locust Summit Coal Plant, and is just using the construction union for the short term, as he will surely hire at the prevailing wage of \$8.50/hour when the plant is in operation.

Thank you for the opportunity to comment on this most important issue.

Yours in Environmental Integrity,
Roseann Weinrich