

Janice Bell - Draft Environmental Impact Statement - Gilberton Coal-to-Clean Fuels and Power Project

From: "Dante Picciano" <dantejp@ptd.net>
To: "Janice Bell" <jbell@netl.doe.gov>
Date: 1/17/2006 10:12 AM
Subject: Draft Environmental Impact Statement - Gilberton Coal-to-Clean Fuels and Power Project

Kindly consider the attached comments in regard to the Draft Environmental Impact Statement (EIS), Gilberton Coal-to-Clean Fuels and Power Project.

Dante J. Picciano, Ph.D., J.D.
2066 Evergreen Drive
Tamaqua, PA 18252
Tel.: 570-386-5744
E-Mail: dantejp@ptd.net

Dante James Picciano
Attorney At Law
2066 Evergreen Drive
Tamaqua, Pennsylvania 18252

Tel.: (570) 386-5744

Fax: (570) 386-8245

January 17, 2006

National Energy Technology Laboratory
U.S. Department of Energy
P.O. Box 10940
Pittsburgh, PA 15236

Re: Draft Environmental Impact Statement (EIS)
Gilberton Coal-to-Clean Fuels and Power Project

Dear Ms. Bell:

Kindly consider the following comments in regard to the above-referenced draft environmental impact statement (EIS).

First, the Department of Energy (DOE) should fully consider the cumulative environmental impacts of other projects and factors known in the immediate area of the proposed project. The DOE should not study the environmental impact of the proposed project in isolation. There are three waste coal burning power plants in the immediate area. In addition, there are other coal burning power plants, numerous landfills, sewage sludge dumping sites, fly ash dumping sites, a hazardous waste recycling plant, a hazardous waste disposal site and acid mine runoff problems nearby. Finally, there are other projects planned for the area that will add to the overall environmental burden.

1-1

Second, the DOE should fully consider the environmental justice issue in the consideration of the EIS. The area surrounding the proposed project is a community that has a high enough population in poverty that the Commonwealth of Pennsylvania classifies it as an environmental justice community.

1-2

Anything less than the full and complete consideration of the cumulative environmental impacts and the environmental justice issue would result in an incomplete analysis of the true environmental impact of the proposed project.

Thank you for your kind consideration of these brief comments.

Very truly yours,

Dante J. Picciano, Ph.D., J.D.

Picciano, Dante J. (1)

Comment 1-1

“First, the Department of Energy (DOE) should fully consider the cumulative environmental impacts of the other projects and factors known in the immediate area of the proposed project. The DOE should not study the environmental impact of the proposed project in isolation. There are three waste coal burning power plants in the immediate area. In addition, there are other coal burning power plants, numerous landfills, sewage sludge dumping sites, fly ash dumping sites, a hazardous waste recycling plant, a hazardous waste disposal site and acid mine runoff problems nearby. Finally, there are other projects planned for the area that will add to the overall environmental burden.”

Response:

The description of the affected environment in Section 3, which forms the baseline for the assessment of environmental impacts, takes into account the effects of many existing and past operations and activities affecting environmental resources in the region. Thus, the potential environmental impacts of the proposed project are considered in a context that includes these other operations and activities. Additionally, Section 6 presents an assessment of potential cumulative environmental impacts, including potential impacts of other projects planned for the area. Also see the response to comment S3-3.

Comment 1-2

“Second, the DOE should fully consider the environmental justice issue in the consideration of the EIS. The area surrounding the proposed project is a community that has a high enough population in poverty that the Commonwealth of Pennsylvania classifies it as an environmental justice community.

Anything less than the full and complete consideration of the cumulative environmental impacts and the environmental justice issue would result in an incomplete analysis of the true environmental impact of the proposed project.”

Response:

DOE has analyzed environmental justice issues and has determined that there would be no disproportionately high and adverse impacts on minority or low-income populations. See response to comment S9-1 and Section 4.1.7.7.

Janice Bell - DOE/EIS-0357

From: "John H. Liddle" <jdam@ptd.net>
To: <jbell@netl.doe.gov>
Date: 1/15/2006 12:57 PM
Subject: DOE/EIS-0357

15 January 2006

Dear Ms. Bell:

Please consider this email as comments on DOE/EIS-0357.

Some of the potentially dangerous projects that are currently active in Schuylkill County include: numerous landfills accepting local as well as out of the area waste, most area homes are heated with coal or oil, five cogeneration plants, a hazardous waste recycling plant, spreading of sewage sludge, land filling of river dredge and etc., a construction and demolition waste dump, and the McAdoo Associates site. In addition, other potentially dangerous projects that have been and are being considered include: a new demolition waste dump, several soil burners, spreading paper mill sludge, a composting operation, and now a coal-to-oil plant.

} 2-1

I don't want to live in a depressed area or see our children fighting a war for oil but when an outsider looks at these lists and the state and federal prisons in the county, he must think of us as one big dump. Politicians at all levels as well as the people in the various state and federal agencies set up to protect the general public need to consider the cumulative affect of all these projects. Consideration must be given to mental and physical health as well as numerous environmental issues.

Your draft document states "County-level pediatric admission rates were not available." This is one of many pieces of data that should indicate the cumulative affects of these projects. Before any new project is approved there should be a through study of the health of county residents to be sure that the cumulative affect of all these projects are not adversely affecting our health.

} 2-2

Sincerely,
John Liddle
713 Pinewood Circle
Pottsville, PA 17901

Liddle, John (2)

Comment 2-1

“Some of the potentially dangerous projects that are currently active in Schuylkill County include: numerous landfills accepting local as well as out of the area waste, most area homes are heated with coal or oil, five cogeneration plants, a hazardous waste recycling plant, spreading of sewage sludge, land filling of river dredge and etc., a construction and demolition waste dump, and the McAdoo Associates site. In addition, other potentially dangerous projects that have been and are being considered include: a new demolition waste dump, several soil burners, spreading paper mill sludge, a composting operation, and now a coal-to-oil plant.

I don't want to live in a depressed area or to see our children fighting a war for oil but when an outsider looks at these lists and the state and federal prisons in the country, he must think of us as one big dump. Politicians at all levels as well as the people in the various state and federal agencies set up to protect the general public need to consider the cumulative affect of all these projects. Consideration must be given to mental and physical health as well as numerous environmental issues.”

Response:

Regarding the cumulative impacts of the proposed project in the context of past, present, and proposed actions affecting the local environment, see the responses to comments S3-3 and 1-1. Potential impacts of the proposed action on human health are discussed in Section 4.1.9.

Comment 2-2

“Your draft document states “County-level pediatric admission rates were not available.” This is one of the many pieces of data that should indicate the cumulative affects of these projects. Before any new project is approved there should be a through study of the health of county residents to be sure that the cumulative affect of all these projects are not adversely affecting our health.”

Response:

All estimates of public health impacts contain uncertainty. Using state or national rates where county rates are not available adds to the uncertainty of the predicted impacts. However, when the impact is small, efforts to reduce the uncertainty result in little if any improvement on the estimated impact. For example, in this case a $1 \mu\text{g}/\text{m}^3$ increase in the PM-10 concentration contributes an increase in asthmatic attacks of about 0.3 per 10,000 asthmatics per day. Assuming there was a 10% error in the number of asthmatics, knowing this would still have little effect on the estimated increase in the number of attacks per day (0.33 vs 0.30).

From: "Rebekah Feeser" <rebekahfeeser@mac.com>
To: <deiscomments@ultradirtyfuels.com>
Date: 1/15/2006 12:21:28 PM
Subject: DEIS comments

As a former resident of Schuylkill County, I am appalled by the short-sightedness of the proposed "coal to oil" refinery. Even a cursory reading of the environmental impact of the "Gilberton Coal-to Fuels and Power Project" clearly reveals that the advertised "Ultra Clean Fuels" is anything but! In short, our families will be affected as will future generations fated to breathing increased amounts of hydrogen and carbon dioxide, drinking water contaminated by mercury and other toxins, and residing in a landscape formerly edged by deciduous woods and now marred by piles of Gasification Slag and punctuated by sulphuric fumes.

3-1

I now live an hour away from Schuylkill County, far enough not to read about this proposal in a local paper, but close enough to be affected by the decisions made by the community. I hope that citizens of the county will look beyond any potential short-term financial gain to consider the negative consequences.

Sincerely,
Rebekah L. Feeser, Ph.D.

CC: "Diane Feeser" <dfeeser@comcast.net>, "Tom Feeser" <tfeeser1@comcast.net>, "Greg Bear" <gregbear@mac.com>

Feeser, Rebekah (3)

Comment 3-1

“As a former resident of Schuylkill County, I am appalled by the short-sightedness of the proposed “coal to oil” refinery. Even a cursory reading of the environmental impact of the “Gilberton Coal-to-Fuels and Power Project” clearly reveals that the advertised “Ultra Clean Fuels” is anything but! In short, our families will be affected as will future generations fated to breathing increased amounts of hydrogen and carbon dioxide, drinking water contaminated by mercury and other toxins, and residing in a landscape formerly edged by deciduous woods now marred by piles of Gasification Slag and punctuated by sulphuric fumes.

I now live an hour away from Schuylkill County, far enough not to read about this proposal in a local paper, but close enough to be affected by the decisions made by the community. I hope that citizens of the county will look beyond any potential short-term financial gain to consider the negative consequences.”

Response:

In this EIS, DOE has attempted to identify and consider all of the potential long-and short-term environmental impacts of the proposed facilities, not just the short-term benefits. Potential impacts to air quality are discussed in Section 4.1.2.2, potential impacts to water quality are discussed in Section 4.1.4, potential impacts to terrestrial ecosystems are discussed in Section 4.1.6.1, and potential impacts from management of gasification slag are discussed in Section 4.1.8.2. Additionally, cumulative impacts are discussed in Section 6 and the balance between short-term uses of the environment and long-term productivity is discussed in Section 9.

Janice Bell - Gilberton EIS

From: "Frank Jackowiak" <fjackowiak@earthlink.net>
To: <jbell@netl.doe.gov>
Date: 1/9/2006 11:39 PM
Subject: Gilberton EIS
CC: "fjackowiak" <fjackowiak@earthlink.net>

I have live in Gilberton for 34 years, in our town is a set of pumps that control mine water not only in our community but also control the water table from Mahanoy City thru Girardville. In the past, up until Mr. Rich built his Processing plant and his Co-Generation Plant we never had a problem with the water table in town except in 1972 with Agnes or a storm with real heavy down pours. Since the operation of his processing plant and Co-generating the water table has been rather high.

I have talked to DEP about this problem and they tell me that the water table should be a foot below the lowest basement. They cannot keep this level for a long peroid of time. Once a complaint is made the level might go down. but after a heavy rain we are back to the same problem. As a guide for the rise in water table - what ever the News predicts for rain amount multiply this by 6 and that about how much the water rises. There are numerous residents with water always in there basements.

As for a history lesson under this town the mines go down around a mile. Once the deep mines closed for surface mining the mines flooded, now that water helps support the town. This town at one time was flat from North to South of main street now there is as much as 4 feet different from one side to another.

Rich states that he is using mine water for his new plant will use this water and then put it back in the pool. Will this draw in water affect the town, not only for the stability of the town but for the processed water that may or may not be polluted. If it is polluted this is in our homes not just under our homes but in our homes in the open.

As an Emergency Management Coordinator for the town and Fire Chief for Gilberton This is one problem the we are concerned about.

Frank Jackowiak
fjackowiak@earthlink.net

4-1

Jackowiak, Frank (4)

Comment 4-1

“I have live in Gilberton for 34 years; in our town is a set of pumps that control mine water not only in our community but also control the water table from Mahanoy City thru Giardville. In the past, up until Mr. Rich built his processing plant and his Co-Generation Plant we never had a problem with the water table in town except in 1972 with Agnes or a storm with real heavy down pours. Since the operation of his processing plant and Co-generating the water table has been rather high.

I have talked to the DEP about this problem and they tell me that the water table should be a foot below the lowest basement. They cannot keep this level for a long period of time. Once a complaint is made the level might go down. But after a heavy rain we are back to the same problem. As a guide for the rise in water table – what ever the News predicts for rain amount multiply this by 6 and that about how much the water rises. There are numerous residents with water always in their basements.

As for a history lesson under this town the mines go down around a mile. Once the deep mines closed for surface mining the mines flooded, now that water helps support the town. This town at one time was flat from North to South of main street now there is as much as 4 feet different from one side to another.

Rich states that he is using mine water for his new plant will use this water and then put it back in the pool. Will this draw in water affect the town, not only for the stability of the town but for the processed water that may or may not be polluted.

If it is polluted this is in our homes not just under our homes but in our homes in the open. As an Emergency Management Coordinator for the town and Fire Chief for Gilberton. This is one problem we are concerned about.”

Response:

EIS Section 3.3.5.1 discusses ground surface subsidence over underground mines in the project area; Section 3.4.3 describes the Pennsylvania Department of Environmental Protection’s pumping of the Gilberton mine pool, which is intended to prevent mine-pool water from flooding basements in Gilberton; Section 4.1.4.1 discusses the probable effects of the proposed project on water levels in the mine pool and on the amount of time that the Pennsylvania Department of Environmental Protection would need to operate its pump; and Section 4.1.3.3 addresses the potential for the proposed project to increase the risk of ground surface subsidence.

As discussed in Section 4.1.4.1, the proposed project could lower the average water level in the Gilberton mine pool. However, this is expected to lead to only a small increase in the chance for the underground mine workings to collapse because (as explained in Section 4.1.3.3) water levels in the mine pool would remain within their current range and the state of Pennsylvania has not observed any mine roof collapses or other subsidence from several decades of pumping from the mine pools at Gilberton and other locations in the region. Also see the responses to comments P11-4 and 41-15 and 41-16.

The basement flooding in Gilberton described by the commenter may not be due to mine-pool water. Investigation of causes for this flooding is beyond the scope of this EIS.

Pumping from the mine pool to supply water for the proposed facilities should lower the average water level in the mine pool, thus reducing the chance for mine-pool water to enter basements. Because (as discussed in Section 4.1.4.1) the project would introduce new pollutants into the mine pool, the project could adversely affect the water quality of any mine-pool water that does enter residents' basements.

Received @ NETL
opened on 1/19/06



Schuykill Economic Development Corporation
91 S. Progress Avenue
P.O. Box 659
Pottsville, PA 17901-0659

(570) 622-1943
Fax: (570) 622-2903
www.sed-co.com
Frank J. Zukas, President

January 12, 2006

Ms. Janice L. Bell
NEPA Document Manager
National Energy Technology Laboratory
P.O. Box 10940
MS 58/247 A
Pittsburgh, PA 15236

Re: Draft EIS-0367

Dear Ms. Bell,

The Schuykill Economic Development Corporation (SEDCO) is a non-profit organization created in 1952 to help recruit jobs in the manufacturing sector to Schuykill County to replace those jobs lost in the mining industry which began its rapid decline after World War II. The SEDCO Board of Directors includes 60 volunteers within Schuykill County, covering a diverse range of community, business, and political leaders, who oversee the direction and operation of the organization.

In July of 2003, management of WMPI PTY, LLC briefed our directors along with DEP Secretary Kathleen McGinty, on the Gilberton Coal to Clean Fuels project and its potential impact on the economic, energy, and environmental fronts of Schuykill County. In November 2005, our Executive Committee reviewed the Draft Environmental Impact Statement, as prepared by the Department of Energy, and also had members and staff attend the two public hearings on the Draft EIS held on January 9th and 10th 2006.

Based on the review of these materials and the information on the project presented to our full board, SEDCO has formalized its endorsement of this project and of the Draft EIS in a vote taken at our January 12, 2006 meeting.

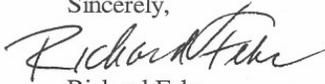
We do believe that a positive economic impact will be experienced by Schuykill County, as a whole, via the development of new "clean coal technologies" such as the one proposed in this project. Given the success demonstrated by the five county-based

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one proposed in this project. Given the success demonstrated by the five county-based co-generation facilities and the volume of the existing fuel stock of both anthracite and anthracite-reclaimed materials, we are convinced that the time is right to demonstrate, with this project, the viability of coal to gas as outlined in the National Environmental Policy Act.

5-1

Sincerely,



Richard Fehr
Chairman



Frank J. Zukas
President

FJZ:lrr

CC: Schuylkill County Commissioners
Schuylkill County Legislative Delegation

Zukas, Frank (5)

Comment 5-1

“The Schuylkill Economic Development Corporation (SEDCO) is a non-profit organization created in 1950s to help recruit jobs in the manufacturing sector to Schuylkill County to replace those jobs lost in the mining industry which began its rapid decline after World War II. The SEDCO Board of Directors includes 60 volunteers within Schuylkill County, covering a diverse range of community, business, and political leaders, who oversee the direction and operation of the organization.

In July of 2003, management of WMPI PTY, LLC briefed our directors along with DEP Secretary Kathleen McGinty, on the Gilberton Coal to Clean Fuels project and its potential impact on the economic, energy, and environmental fronts of the Schuylkill County. In November 2005, our Executive Committee reviewed the Draft Environmental Impact Statement, as prepared by the Department of Energy, and also had members and staff attend the two public hearings on the Draft EIS held on January 9th and 10th 2006. Based on the review of these materials and the information on the project presented to our full board, SEDCO has formalized its endorsement of this project and of the Draft EIS in a vote taken at our January 12, 2006 meeting.

We do believe that a positive economic impact will be experienced by Schuylkill County, as a whole, via the development of new “clean coal technologies” such as the one proposed in this project. Given the success demonstrated by the five county-based co-generated facilities and the volume of the existing fuel stock of both anthracite and anthracite-reclaimed materials, we are convinced that the time is right to demonstrate, with the viability of coal to gas as outlined in the National Environmental Policy Act.”

Response:

The comments have been noted.

*Received @ NETL
opment 1/18/06*

| | |
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| Registered Attendance at Public Hearings for the Draft Environmental Impact Statement (EIS) Gilberton Coal-to-Clean Fuels and Power Project Shenandoah, PA -- January 9, 2006 <input checked="" type="checkbox"/> Pottsville, PA -- January 10, 2006 <input type="checkbox"/> | |
| Do you wish to be placed on the mailing list <input checked="" type="checkbox"/> Yes for the Final EIS and Record of Decision? <input type="checkbox"/> No | |
| Name: <i>PETER C. SHAULIS</i> | Address: <i>25 CHURCH ST.</i> |
| Affiliation: <i>RESIDENT-HOMEOWNER</i> | <i>GILBERTON, PA 17934</i> |
| Telephone: <i>570-874 3080</i> | |
| Comments: <i>THIS PROJECT IS NOT IN THE BEST INTEREST OF THE SURROUNDING POPULATION. ENVIRONMENTAL DAMAGES, ALREADY APPARENT, FROM THE ACTIVITY OF COGENERATION PLANTS WILL BE COMPOUNDED. CLEAN AIR, CLEAN WATER AND A HEALTHY ENVIRONMENT IS AN ENTITLEMENT AND MUST BE PROTECTED. IF THIS PROJECT IS APPROVED, LEGAL RECOURSE MUST BE PROVIDED BY LAW OR REGULATION FOR DAMAGES INCURRED.</i> | |

} 6-1

Shaulis, Peter C. (6)

Comment 6-1

“This project is not in the best interest of the surrounding population. Environmental damages already apparent from the activity of co-generation plants will be compounded. Clean air, clean water and healthy environment is an entitlement and must be protected. If this project is approved, legal recourse must be provided by law or regulation for damages incurred.”

Response:
The comment has been noted.

Received @ NETL
Opened on 1/18/06

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|--|----------------------|
| Registered Attendance at Public Hearings for the Draft Environmental Impact Statement (EIS) Gilberton Coal-to-Clean Fuels and Power Project Shenandoah, PA -- January 9, 2006 <input checked="" type="checkbox"/> Pottsville, PA -- January 10, 2006 <input type="checkbox"/> | |
| Do you wish to be placed on the mailing list <input type="checkbox"/> Yes for the Final EIS and Record of Decision? <input checked="" type="checkbox"/> No | |
| Name: Theresa Reilly | Address: 60 N 5th St |
| Affiliation: Citizen (DPA Employee) | Frankville PA 17931 |
| Telephone: 570 874-1408 | |
| Comments: Against the plant! I am a cancer survivor & am horrified at the cancer rate in the area. I know Mr Rich's compliance history & it is not very good. Let him live near the plant, not us. The economic benefits do not outweigh the environmental hazards. Please deny the permit. Thank you. | |

7-1

Reilly, Theresa (7)

Comment 7-1

"Against the plant! I am a cancer survivor and I am horrified at the cancer rate in the area. I know Mr. Rich's compliance history and it is not very good. Let him live near the plant, not us. The economic benefits do not outweigh the environmental hazards. Please deny the permit."

Response:

The comment has been noted.



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Pennsylvania Field Office
315 South Allen Street, Suite 322
State College, Pennsylvania 16801-4850



January 3, 2006

Janice L. Bell
U.S. Department of Energy
3610 Collins Ferry Road
P.O. Box 880
Morgantown, WV 26507-0880

Dear Ms. Bell:

Due to a lack of personnel and/or funds, no action is being taken on the following project:

| <u>Project</u> | <u>County</u> |
|---|---------------|
| Design, construction, and operation of a new coproduction of 41 MW of electricity plant | Schuylkill |

Accordingly, no report pursuant to the Fish and Wildlife Coordination Act (48 Stat. 401, 16 U.S.C. 661 *et seq.*) is anticipated at this time, and the Act's consultation requirements for this project have been satisfied. However, if project circumstances change, or new information regarding impacts to fish and wildlife becomes available, the Service may determine that a report on the proposed project is appropriate.

8-1

Sincerely,

David Densmore
Supervisor

Densmore, David (8)

Comment 8-1

“[N]o report pursuant to the Fish and Wildlife Coordination Act (48 Stat. 401, 16 U.S.C. 661 et seq.) is anticipated at this time, and the Act’s consultation requirements for this project have been satisfied. However, if project circumstances change, or new information regarding impacts to fish and wildlife becomes available, the Service may determine that a report on the proposed project is appropriate.”

Response:

The comment has been noted.

Received @ NETL
opened 1/12/06



Pennsylvania Department of Environmental Protection

Rachel Carson State Office Building
P.O. Box 2063
Harrisburg, PA 17105-2063

January 3, 2006

Secretary

717-787-2814

Ms. Janice L. Bell
NEPA Document Manager
US DOE National Energy Technology Laboratory
626 Cochrans Mill Road
P.O. Box 10940
Pittsburgh, PA 15236-0940

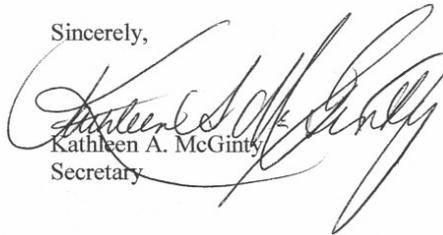
Dear Ms. Bell,

Thank you for your letter and copy of the draft EIS document submitted for review and comment by the Department of Environmental Protection (DEP). My staff has informed me that review of the EIS is currently underway. DEP has expedited an interdisciplinary review among staff in order to respond to you by February 8, 2006.] 9-1

DEP recognizes the Gilberton Coal-to-Clean Fuels and Power Project as an important project for the Commonwealth, and staff will devote full attention to a timely and professional review effort. Mr. Joseph Sieber of the Office of Field Operations is designated to coordinate the review and coordination of this document. He can be contacted by e-mail at jsieber@state.pa.us or by phone at 717-783-8697. If you have any questions, please feel free to contact Mr. Sieber at any time during the environmental (NEPA) review and approval process.

Thank you for your interest in this matter. I hope this information is helpful. If you have any further questions, please feel free to contact Mr. Sieber or Mr. Michael D. Sherman, Deputy Secretary for Field Operations, by e-mail at msherman@state.pa.us or by phone at 717-787-5028.

Sincerely,



Kathleen A. McGinty
Secretary

McGinty, Kathleen (9)

Comment 9-1

“Thank you for your letter and copy of the draft EIS document submitted for review and comment by the Department of Environmental Protection (DEP). My staff has informed me that review of the EIS is currently underway. DEP has expedited an interdisciplinary review among staff in order to respond to you by February 8, 2006.

Response:

The comment has been noted.

*Revised @ NE
opened 1/12/06*

**Registered Attendance at Public Hearings for the
Draft Environmental Impact Statement (EIS)
Gilberton Coal-to-Clean Fuels and Power Project**

Shenandoah, PA -- January 9, 2006
Pottsville, PA -- January 10, 2006

Do you wish to be placed on the mailing list Yes
for the Final EIS and Record of Decision? No

| | |
|--|----------------------------|
| Name: <i>Daniel Pascarage</i> | Address: <i>PO Box 133</i> |
| Affiliation: | <i>Delano Pa 18720</i> |
| Telephone: | |
| Comments: <i>Waste (solid) will be as bad as 'Culon' that will be used for fuel, with no gain in removal of rail waste</i> | |
| | |
| | |

} 10-1

*Revised @ NE
opened 1/12/06*

**Registered Attendance at Public Hearings for the
Draft Environmental Impact Statement (EIS)
Gilberton Coal-to-Clean Fuels and Power Project**

Shenandoah, PA -- January 9, 2006
Pottsville, PA -- January 10, 2006

Do you wish to be placed on the mailing list Yes
for the Final EIS and Record of Decision? No

| | |
|--|----------------------------|
| Name: <i>Daniel Pascarage</i> | Address: <i>PO Box 133</i> |
| Affiliation: | <i>Delano Pa</i> |
| Telephone: | <i>18720</i> |
| Comments: <i>Water Use - at 80 million gallons of water per day will have a very serious effect on potable water in this entire area</i> | |
| | |
| | |

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| | |
|---|----------------------------|
| Registered Attendance at Public Hearings for the Draft Environmental Impact Statement (EIS) Gilberton Coal-to-Clean Fuels and Power Project Shenandoah, PA -- January 9, 2006 <input type="checkbox"/> Pottsville, PA -- January 10, 2006 <input type="checkbox"/> | |
| Do you wish to be placed on the mailing list <input type="checkbox"/> Yes for the Final EIS and Record of Decision? <input checked="" type="checkbox"/> No | |
| Name: <i>Daniel Pascavage</i> | Address: <i>Po Box 133</i> |
| Affiliation: | <i>Delant Pa 18220</i> |
| Telephone: | |
| Comments: <i>Air emissions combined with air emissions from other "Co. Gen" plants will be greater than we residents should have to be exposed to</i> | |
| | |
| | |
| | |

*Received @ NETL
opened 1/22/06*

} 10-3

Pascavage, Daniel (10)

Comment 10-1

“Waste (solid) will be as bad as “coal” that will be used for fuel, with no gain in removal of said waste.”

Response:

Impacts from the proposed facilities’ solid wastes and byproducts are discussed in Section 4.1.8.2. The principal wastes from the facilities are expected to be relatively inert solids that can be managed with minimal environmental impact. By removing waste coal refuse from the land and reclaiming abandoned mine lands, the project would be expected to reduce the continuing adverse impact to the local environment from waste coal.

Comment 10-2

“Water use – at 80 million gallons of water per day will have a very serious effect on potable water in this entire area.”

Response:

Water use by the proposed facilities is estimated at about 6 million gallons per day. The Susquehanna River Basin Commission has authorized the withdrawal of up to 7 million gallons per day from the Gilberton mine pool, which is not a source of potable water supply. Potential impacts of this water use on water supplies are analyzed in Section 4.1.4.

Comment 10-3

“Air emissions combined with air emissions from other co-gen plants will be greater than we residents should have to be exposed to.”

Response:

See response to comment S3-3.

RE: Gasification Project
SCH. CO. PA, 1-10-06

- 1. Has the Department of Energy looked at the violation and compliance history of the company and all of its affiliates? } 11-1
- 2. Does the compliance history of an operator matter to the DOE? } 11-2
- 3. Why can't this project stand on its own merit without government welfare grants? } 11-3
- 4. What percentage of the project cost will be funded with tax dollars or government money? } 11-4
- 5. How many state and federal dollars did this project receive? } 11-5
- 6. This project will take and use 7 Million Gallons of Water a Day. Where will this water come from, and what will happen when the surface subsides because of this depletion in aquifers? Will the company be made to restore any properties that will be destroyed? } 11-6
- 7. There will be a staggering amount of slag or by-product created by this project. Where will this material be taken, how will it be transported, who will test it for leaching and how will it be handled if it is found to be toxic or hazardous? } 11-7
- 8. If this project is granted a KOZ or tax-free status for 10 years, how will it possibly be helping our economy? The laborers will no doubt come from Mexico or somewhere that provides cheap labor, based on the history of the project developers in building the co-generation facilities. } 11-8

Thank you.

Chris Lutchen
 CHRIS LUTCHEN
 301 S, NICHOCAS ST,
 ST. CLAIR PA 17970

Written comments
 Received at
 public hearing
 1/10/06

Lutchen, Chris (11)

Comment 11-1

“Has the Department of Energy looked at the violation and compliance history of the company and all of its affiliates?”

Response:

Although DOE does not serve as a regulatory agency, if DOE decides to provide financial assistance, DOE will expect WMPI PTY., LLC, to follow all applicable federal, state, and local environmental regulations.

Comment 11-2

“Does the compliance history of an operator matter to the DOE?”

Response:

See response 11-1.

Comment 11-3

“Why can’t this project stand on its own merit without government welfare grants?”

Response:

The proposed action falls under the Department of Energy’s Clean Coal Power Initiative (CCPI), a statutorily authorized program to provide financial assistance to coal-based technology demonstrations. CCPI funds assist technologies to bridge the gap from development to commercialization. The WMPI project is the first of its kind in the United States. The proposed project would demonstrate the first clean coal power facility in the United States using coal waste gasification as the basis for clean power, thermal energy, and clean fuels production. A successful demonstration would generate technical, environmental, and financial data from the design, construction, and operation of the facilities to confirm that the integrated technologies can be implemented at the commercial scale. The project would demonstrate that coal waste can be used to produce steam, electricity, and liquid hydrocarbon fuels that may ultimately help to reduce U.S. dependence on imported oil. While the individual technologies have been independently operated, this project would demonstrate the integration of the technologies. A successful demonstration would indicate that the performance and cost targets for the integrated technologies are achievable at the commercial scale. In view of the technical and economic risk associated with the project, DOE believes financial support is appropriate.

Comment 11-4

“What percentage of the project cost will be funded with tax dollars or government money?”

Response:

DOE is proposing to fund approximately 10%, or \$100 million of the total estimated project cost of \$1 billion.

Comment 11-5

“How many state and federal dollars did this project receive?”

Response:

The CCPI project has not been awarded and therefore has yet to receive any federal dollars. DOE is proposing to fund approximately 10%, or \$100 million of the total estimated project cost of \$1 billion.

Comment 11-6

“This project will take and use 7 million gallons of water a day. Where will this water come from, and what will happen when the surface subsides because of this depletion in aquifers? Will the company be made to restore any properties that will be destroyed?”

Response:

Withdrawal of water from the Gilberton mine pool has been authorized by the Susquehanna River Basin Commission. An average of 7.8 million gal/day would be withdrawn from the mine pool to support operations of the proposed facilities (including beneficiation of culm from the existing Gilberton Power Plant; Section 2.1.5.2)). As discussed in Section 4.1.4.1, this could lower the average water level in the Gilberton mine pool and increase the likelihood of ground surface subsidence due to collapse of abandoned underground mine workings, but the potential for such an impact would be small because (as explained in Section 4.1.3.3) water levels in the mine pool would remain within their current range and the Commonwealth of Pennsylvania has not observed any mine roof collapses or other subsidence from several decades of pumping from the mine pools at Gilberton and other locations in the region. WMPI has not offered to assume liability for any future subsidence over the Gilberton mine pool. However, property owners may qualify to purchase mine subsidence insurance from the Commonwealth of Pennsylvania’s Mine Subsidence Insurance Fund. See the responses to comment P11-4 and P11-5 for additional discussion of these topics.

Comment 11-7

“There will be a staggering amount of slag or by-product created by this project. Where will this material be taken, how will it be transported, who will test it for leaching and how will it be handled if it is found to be toxic or hazardous?”

Response:

To the extent possible, the slag would be sold commercially. Byproduct sulfur also would be sold commercially. Fine solids, excess slag, and sludges from water and wastewater treatment would be used in mine reclamation, providing they meet Pennsylvania Department of Environmental Protection regulatory criteria. Testing for leachability would be the responsibility of WMPI, in accordance with specifications in Pennsylvania Department of Environmental Protection regulations and technical guidance. Materials found to be unsuitable for commercial sale or use in mine reclamation would be sent to a commercial landfill. Waste materials determined to be unsuitable for use in mine reclamation or placement in a municipal solid waste landfill would either be treated to stabilize them or would be sent to a commercial hazardous waste facility. Additional discussion on the

management of slag and other solid by-products from project operation is in Sections 2.1.6.3 and 4.1.8.2.

Comment 11-8

“If this project is granted a KOZ or tax-free status for 10 years, how will it possibly be helping our economy? The laborers will no doubt come from Mexico or somewhere that provides cheap labor, based on the history of project developers in building the co-generation facilities.”

Response:

See responses to comments S1-1 and S11-1.



A note from:
Mrs. Sharon R. Chiao



Dear Ms. Bell



Please note the
enclosed-



Two townships are
being mentioned-



Which township is it
being built in? He
^{mr. Rich} has yet to show



Proposed location to
either township- We
get 2nd hand info
from Dep-



Also note comment
concerning location
of public meetings.



Pottsville has nothing
to do with this project
S.C.

12-1

12-2



Pennsylvania Department of Environmental Protection

2 Public Square
Wilkes-Barre, PA 18711-0790
March 21, 2005

Northeast Regional Office

Fax 570-826-2357

To Whom It May Concern:

DEP has issued a Plan Approval for the WMPI PTY, LLC project located in Mahanoy and West Mahanoy Townships, Schuylkill County. We are sending you information on the action since you commented on the proposal during the public comment period.

Enclosed, please find the following:

1. The Plan Approval
2. Comment and Response Document

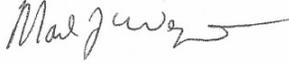
Any person aggrieved by this action may appeal, pursuant to Section 4 of the Environmental Hearing Board Act, 35 P.S. Section 7514, and the Administrative Agency Law, 2 Pa C.S., Chapter 5A, to the Environmental Hearing Board, Second Floor, Rachel Carson State Office Building, 400 Market Street, P.O. Box 8457, Harrisburg, PA 17105-8457, (717) 787-3483. TDD users may contact the Board through the Pennsylvania Relay Service, (800) 654-5984. Appeals must be filed with the Environmental Hearing Board within 30 days of receipt of written notice of this action unless the appropriate statute provides a different time period. Copies of the appeal form and the Board's rules of practice and procedures may be obtained from the Board. The appeal form and the Board's rules of practice and procedures are also available in Braille or on audiotape from the Secretary to the Board at (717) 787-3483. This paragraph does not, in and of itself, create any right of appeal beyond that permitted by applicable statutes and decisional law.

IF YOU WANT TO CHALLENGE THIS ACTION, YOUR APPEAL MUST REACH THE BOARD WITHIN 30 DAYS. YOU DO NOT NEED A LAWYER TO FILE AN APPEAL WITH THE BOARD.

IMPORTANT LEGAL RIGHTS ARE AT STAKE, HOWEVER, SO YOU SHOULD SHOW THIS DOCUMENT TO A LAWYER AT ONCE. IF YOU CANNOT AFFORD A LAWYER, YOU MAY QUALIFY FOR FREE PRO BONO REPRESENTATION. CALL THE SECRETARY TO THE BOARD (717) 787-3483 FOR MORE INFORMATION.

If the Department can be of further assistance, please call Shailesh Patel, Air Quality Program, at the above telephone number.

Sincerely,



for Thomas D. DiLazaro
Air Quality Program Manager

Enclosures

Received 12/14/05

**Comment and Response Document
WMPI, PTY, LLC
Mahanoy and W. Mahanoy Townships,
Schuylkill County.
Application No. 54-399-034**

In accordance with Section 127.44 and 40 CFR 52.21 the Department of Environmental Protection conducted a Public hearing on January 18, 2005 to obtain comments from the citizens of Mahanoy and W. Mahanoy Townships and nearby communities about the application submitted by WMPI, PTY, LLC. (the Permittee), P.O. Box R, Frackville, PA 17931. The application (# 54-399-034) was submitted to construct a coal to clean fuels facility at West Mahanoy & Mahanoy Townships, Schuylkill County.

The facility will construct and operate a plant to co-produce approximately 5,000 barrels per day of high quality, liquid hydrocarbon products and about 131 MW (92 MW for internal use and 39 MW for export) of electricity. The liquid hydrocarbon would include diesel fuel and naphtha. The proposed plant would operate under the primary SIC Code 1311 for coal gasification and liquefaction and use four major technology systems: (1) gasification technology from Shell, which would be particularly suitable for processing the high ash anthracite coal waste that would provide the primary feed to the plant into synthesis gas consisting primarily of carbon monoxide and hydrogen; (2) synthesis gas treatment and cleaning technology systems to remove solid particulate matter and gaseous contaminants to trace concentrations; (3) indirect liquefaction for converting the produced clean synthesis gas into synthetic hydrocarbon liquids using Fischer-Tropsch (F-T) technology from SASOL Technology, Ltd., and (4) combustion of the unconverted gas in a gas turbine/combined cycle power plant with steam turbo-generators to produce electricity and steam, primarily for internal use, within the plant.

In reviewing written comments and testimony of numerous citizens from this public hearing, the following are the responses of the Department to those comments.

Comment #1: A comment requesting an environmental Impact Statement.

Response #1: The Department of Environmental Protection does not required the applicant to submit an Environment Impact study with this application for this size of project, however the United States Department of Energy is currently conducting an environmental impact study.

Comment #2. Low emissions from WMPI PTY., LLC's Coal-to-Clean Fuels project when compared to power plants in the area.

Response #2 – The low emissions are a result of the advanced gasification technology (as opposed to combustion technology) being utilized for the project along with the use of state of the art pollution control technologies. When the project becomes operational, the stack-testing requirement specified in the permit and Continuous Emission Monitoring Systems in place at the facility will ensure compliance with the emission limitations.

Comment #3. Impact of Mercury and Arsenic emissions from the project on lakes and reservoir.

Response #3– The primary feed material for the project would be up to approximately 4,700 dry tons-per day of anthracite coal waste. This project will utilize advanced

gasification technology (as opposed to combustion technology) along with the Fischer-Tropsch technology which inherently removes mercury, arsenic and other metals from the culm material.

Comment #4 – Emissions from the project will cause serious health risk to the public and will worsen the existing fog problem in the area.

Response #4. As stated in the response No.2, the use of state of the art pollution control technologies will ensure the low emissions from the sources at the proposed facility. These low levels of emissions from the facility will not exceed the ambient air quality standards for the pollutants in the area. A Department operated air monitoring station in the area shows no exceedances of any pollutant concentrations above the established ambient air quality standards for the pollutants.

Comment #5- Malodorous air contaminants (rotten egg smell) from the facility.

Response #5 - The project utilizes a Sulfur Recovery Unit/Tail Gas Treatment Unit (SRU/TGTU) to control hydrogen sulfide emissions effectively to meet state and federal regulatory standards and to recover sulfur for sale into the marketplace, which is the best available control technology available, and meets and exceeds the Department requirements. In addition, the liquefaction process has a very low and specified design limitation of sulfur to avoid fouling of the Fischer Tropsch process catalyst. For the reasons mentioned above, it is expected that the hydrogen sulfide emissions from the project would be low. Further, the approval for the project will explicitly restrict any malodorous air contaminants from the facility as required by 25 PA Code Section 123.31. The Department personnel will inspect the facility routinely, if the facility fails the inspection, the company will be subject to enforcement action.

Comments # 6- Is the Department going to do an air quality study in the area?

Response #6. An air quality study in the area is not required based on the proposed emission from the facility. An air monitoring site located in Shenandoah, Schuylkill County has not shown any exceedances of any pollutant concentrations above the established ambient air quality standards. Based on the comments resulted from this public hearing, the Department will not remove the air monitoring station from Shenandoah, Schuylkill County.

Comment #7- Water usage by the facility will force the resident to curtail their use of potable water for domestic purpose.

Response #7. Not related to the subject. (Testimony not related to the air issues.)

Comment #8- Why was the public hearing was held at the North Schuylkill Jr/Sr. High School instead of Shenandoah Valley High School or at the Townships where the proposed facility is going to be built?

Response #8- The North Schuylkill Jr/Sr High School was selected because of its close proximity to the proposed facility. Furthermore, the North Schuylkill Jr/Sr High School was very receptive in agreeing to facilitate the public hearing and did not require any fees for the usage of the auditorium.

MAHANOGY Area and Shenandoah not asked for mtg!
Comment #9: The Department should hold another public hearing as the notice was in the newspaper on December 16th, 17th and 18th, when most of people are too busy at Christmas shopping and do not notice the public hearing date.

Response #9: The hearing notification information (including the length of the public comment period subsequent to the hearing) was published by the Department in the PA Bulletin (Vol. 34, No.51) on December 18th. This information was also published in a local newspaper on December 15th, 16th & 17th. The Department met the requirements of Title 25 PA, Chapter 127, Section 127.44, since the notice was published on 3 separate days in a prominent place and size in a newspaper of general circulation in the county in which the source is to be located.

Again?

Comment #10: Mahanoy Township has not received any information or permits or any plans for a plant to be put in the Township. The Department issued no letter to either the municipality or township about the public hearing.

Response #10: - In accordance with Title 25, Chapter 127, section 127.43a, the applicant has sent a notification letter to the Mahoney Township Supervisor, Ms. Debra Kane dated June 10, 2003. Copy of the notification letter and proof that the notification was received by the Township official is attached with this document. The return receipt shows that the Townships and County have received these notifications regarding the construction of the proposed facility and submission of an air quality application to the Department.

Title 25 PA, Chapter 127, section 127.44 requires publishing notices of hearing in the Pennsylvania Bulletin and in a newspaper of general circulation in the county in which the proposed facility is to be located. The hearing notification information (including the length of the public comment period subsequent to the hearing) was published by the Department in the PA Bulletin (Vol. 34, No.51) on December 18th. This information was also published in a local newspaper on December 15th, 16th & 17th. The Department of Environmental Protection met all regulatory requirements for the public notice.

Comment #11: We support the proposed project, in that it is an environmentally friendly facility, the project is an environmentally sound alternative to land waste reclamation as coal waste is converted into high value products, will provide needed jobs to the community, will reduce dependency on foreign oil, will reduce acid mine drainage problem, will reduce ugly waste coal piles, will reduce the particulate emissions problems related to the waste coal piles. Project in best interest of the Commonwealth and the country.

Response #11: Comments duly noted by the Department. *Mr. Rich's employee from Whitehall, Pa. out of our area*

Comment #12: Support Plant. Proposed project will alleviate local unemployment by providing jobs and job security.

Response #12: Comments duly noted by the Department. *Another Employee*

Comment #13: Bring the mobile unit to test air for sulfur dioxide, nitrogen oxide & particulate matter.

Response #13: The Department operates an air monitoring station located at Shenandoah, Schuylkill County which monitors all of the above pollutants in the area. On a continuous basis, data from the monitor is available upon request.

Comment #14: Noise from the plant.

Response #14: The Department has no jurisdiction over noise from the facility. Any local ordinances for noise must be enforced by the township.

There are other non air quality application fact finding comments from the public regarding personnel health problems, water problems, energy issues, economic issues, use of red dust on road by PENDOT as a anti-skid material, testing of prisoner's health, federal and state grants to the proposed facility, etc. These are non-air quality comments and cannot be addressed by the Air Quality Program.

Chiao, Sharon (12)

Comment 12-1

“Two townships are being mentioned – which township is it being built in? He, Mr. Rich, has yet to show proposed location to either township – we get 2nd hand info. from DEP.”

Response:

The proposed facilities would be located in the western portion of Mahanoy Township and the Mahanoy Area School District. This information was confirmed by the applicant (Robert Hoppe WMPI, personal communication to Robert L. Miller, ORNL, January 10, 2006). The EIS summary and Sections 1, 2, and 3 have been revised to provide this information.

Comment 12-2

“Also, note comment concerning location of public meetings. Pottsville has nothing to do with this project.”

Response:

DOE cannot dictate where the Pennsylvania Department of Environmental Protection elected to hold its public hearing for the air permit. The DOE's initial public scoping meeting was held in Pottsville because it is the largest city in Schuylkill County, approximately eight miles from the proposed project site, and the Lengel Middle School could accommodate the widely attended meeting. DOE's public hearings for the Draft Environmental Impact Statement were held at Shenandoah Junior/Senior High School and again at the Lengel Middle School in Pottsville. The first public hearing was held at Shenandoah Junior/Senior High School (January 9, 2006), at the request of the West Mahanoy Township Supervisors (letter from Ms. Christina Hale, January 17, 2005). The second hearing was held in Pottsville (January 10, 2006), to ensure that interested stakeholders, who might have attended the public scoping meeting, also had adequate access to the public hearings.

Janice Bell - Comment on Clean Air Act General Conformity Analysis in Gilberton DEIS

From: "Koss, Theodore" <Theodore.Koss@eh.doe.gov>
To: <jbell@netl.doe.gov>
Date: 12/13/2005 3:33:28 PM
Subject: Comment on Clean Air Act General Conformity Analysis in Gilberton DEIS
CC: "Matarrese, Mark" <Mark.Matarrese@HQ.DOE.GOV>, "Wallo, Andrew" <Andrew.Wallo@eh.doe.gov>, "Freeman, Denise" <Denise.Freeman@eh.doe.gov>

Janice,

My organization (the Office of Air, Water and Radiation Protection Policy and Guidance [EH-41]) has reviewed the General Conformity analysis in this DEIS (as we routinely do for proposed DOE actions in DEISs subject to conformity), and we have the following comment:

The DEIS states that the proposed action will take place in Schuylkill Co., PA, which is in an attainment area for all of the National Ambient Air Quality Standards (NAAQS) (p 3-3; p 4-8). On p 4-8, the DEIS presents the result of a conformity review, which indicates that, in light of low estimated air emissions, the proposed action would be exempt from conformity requirements imposed because Schuylkill Co. was formerly in a nonattainment area for the 1-hour ozone ambient standard. The text indicates that although the conformity review is not needed because EPA revoked the 1-hour ozone standard on June 15, 2005, the analysis was conducted prior to June 15 and is presented anyway (presumably to present additional air quality information).

EH-41 agrees that Schuylkill Co. is in attainment with all of the NAAQS, and we also agree that a conformity review is not needed for this proposed action in connection with the revoked 1-hour ozone ambient standard, per 40 CFR 51.905(e)(3). Because the conformity analysis is not needed, and the analysis presented on pp 4-8 and 4-9 would not be sufficiently comprehensive anyway to demonstrate that the project would be exempt from conformity because of low air emissions, we recommend that the conformity review section be deleted and replaced with a sentence that states that the proposed action is exempt from General Conformity requirements because the action's air emissions will not occur in an area subject to a conformity review.

} 13-1

Please get in touch with me if there are questions on this.

Ted Koss
Department of Energy
Office of Air, Water and Radiation Protection Policy and Guidance (EH-41)
theodore.koss@eh.doe.gov
202-586-7964

Koss, Ted (13)

Comment 13-1

“Because the conformity analysis is not needed, the analysis presented on pp 4-8 and 4-9 would not be sufficiently comprehensive anyway to demonstrate that the project would be exempt from conformity because of low air emissions, we recommend that the conformity review section be deleted and replaced with a sentence that states that the proposed action is exempt from General Conformity requirements because the action’s air emissions will not occur in an area subject to a conformity review.”

Response:

The conformity review has been removed from the EIS.

Received @ NETL, 1/24/06

**Registered Attendance at Public Hearings for the
Draft Environmental Impact Statement (EIS)
Gilberton Coal-to-Clean Fuels and Power Project
Shenandoah, PA -- January 9, 2006
Pottsville, PA -- January 10, 2006**

Do you wish to be placed on the mailing list Yes
for the Final EIS and Record of Decision? No

| | |
|---------------------------------|------------------------------------|
| Name: MICHAEL ZAHODNICK | Address: 1075 DGGP CREEK RD |
| Affiliation: INDEPENDENT | Ashland, PA 17921 |
| Telephone: 682-8355 | |

Comments: COMMON SENSE DICTATES, NITROGEN OXIDES 81.9 TONS
CARBON MONOXIDE 95.5 TONS - SULPHUR DIOXIDES 89.5 TONS
PARTICULATE MATTER 49.8 TONS, VOLATILE ORGANIC COMPOUNDS
38.8 TONS HAZARDOUS AIR POLLUTANTS 3.7 TONS, MERCURY 38 lbs/yr
CANNOT BE GOOD - IF EPA WOULD DO THERE JOB, WE WOULD
NEED TO FILL THIS OUT WE DON'T NEED JOB'S THAT BAD,
Michael Zahodnick

14-1

Zahodnick, Michael (14)

Comment 14-1

“Common sense dictates, nitrogen oxides 81.9 tons, carbon monoxide 95.5 tons, sulfur dioxides 89.5 tons, particulate matter 49.8 tons, volatile organic compounds, 38.8 tons hazardous air pollutants 37 tons, mercury 38 lbs./yr. cannot be good –”

Response:

The impacts of operational air emissions from the proposed facilities are assessed in Section 4.1.2.2.

*Received @ NETL
4/6/06*

430 W. Mahanoy Ave.

Mahanoy City, Pa 17948

**Ms. Janice Bell
US Dept of Energy
Pittsburgh, Pa. 15236**

To whom it may concern:

As a lifelong resident of the Mahanoy Area and Mahanoy valley of Schuylkill County, Pa. I have many concerns that I feel are being brushed under the carpet by both John Rich and Co. and the Dept of Energy.

You do not live here and wake up to pink ash on your vehicle whenever the weather is damp, which enables the ash to stick to your cars. We know what the cogen plants are doing to the area, you do not. Your theoretical assumptions are just that, assumptions. I personally have seen the pink emissions from the cogen plant in Frackville, Pa. While sitting in my car at the Schuylkill Mall, I witnessed for approximately ten minutes emissions into the air of a pink plume. Because there are no emissions when you are monitoring does not mean that there are no emissions.

15-1

Anyone who would place a monitor upwind at the Shenandoah High School really does not want to know the extent of the pollution in the area. As even an uneducated person could understand, to get a reading from a source, you must place the monitor downwind of the problem area.

15-2

In relation to the proposed coal to gas plant:

1. I am concerned about the air quality from the additional pollutants that Rich will spew into the air—Mercury, sulphur dioxide and other chemicals.

2. I am concerned about the inability to make a profit by the larger gas and fuel companies because the technique is not practical.

thereby, not requiring Rich to not pay back the loans and grants which WILL COST ME MONEY.

3. The air quality to the prisoners at SCI Mahanoy being locked in an environment next door to this monstrosity. What happens if as your report states that there is a 1 in 40 chance that an accident will occur with the system. What now happens to these inmates. What method of transportation will be used at what rate of time to evacuate them and to what place. 15-3

4. The water usage and drainage of the Mahanoy mine pool. Draining this pool of 7 million gallons a day and replacing 1/2 of that amount must drain the pool which will allow the rotten timbers of the mines to collapse thereby creating subsidence in Mahanoy City and Gilberton. Perhaps Richie Rich may want to buy the town and strip it at that point. Everything in it will probably be worthless. 15-4

5. Excess water usage from other sources. If the mine pool is insufficient, water will be drawn from the water table thereby causing wells and reservoirs to go dry. 15-5

6. Finally, the air quality for my family and me and the damage to the environment including Locust Lake State Park and Tuscarora State Park. We are already experiencing poor air quality from the cogens and the ambient environment, please let us live in peace. 15-6

7. Rich has stated that he will burn anything. Does that mean garbage, chemicals, hazardous waste, you name it. If this project is as good as you think it is, please place it where you live, not here, with my blessings. 15-7

Cordially,

John Gill
Resident of Mahanoy City.

Gill, John (15)

Comment 15-1

“You do not live here and wake up to pink ash on your vehicle whenever the weather is damp, which enables the ash to stick to your cars. We know what the cogen plants are doing to the area, you do not. Your theoretical assumptions are just that, assumptions. I, personally have seen the pink emissions from the cogen plant in Frackville, PA. While sitting in my car at the Schuylkill Mall, I witnessed for approximately ten minutes emissions into the air of a pink plume. Because there are no emissions when you are monitoring does not mean that there are no emissions.”

Response:

Your observations have been noted. The proposed facilities integrate different technologies than the technologies used by existing plants, and would have environmental controls and permit conditions to control air emissions. Particulate emissions are described in Section 4.1.2.2 of the EIS. Pollution prevention and mitigation measures are described in Table 4.2.1.

Comment 15-2A

“Anyone who would place a monitor upwind at the Shenandoah High School really does not want to know the extent of the pollution in the area. As even an uneducated person could understand, to get a reading from a source, you must place the monitor downwind of the problem area”

Response:

The Pennsylvania Department of Environmental Protection has recently installed a PM-10 monitor at the Mahanoy State Correctional Institution adjacent to the proposed facilities to measure ambient PM-10 concentrations. In addition, high-volume particulate samplers to measure ambient concentrations of metals (i.e., arsenic, cadmium, chrome, nickel, and lead) and total suspended particles have recently been installed by the Pennsylvania Department of Environmental Protection at the Mahanoy State Correctional Institution, the Mahanoy City Sewage Treatment Plant, and the Frackville State Correctional Institution. All samplers began running on the same day (May 9, 2006) on a 6-day cycle (i.e., operating for one 24-hour period every sixth day).

Comment 15-2B

“I am concerned about the air quality from the additional pollutants that Rich will spew into the air – Mercury, sulphur dioxide and other chemicals.”

Response:

The impacts of operational air emissions from the proposed facilities are assessed in Section 4.1.2.2.

Comment 15-2C

“I am concerned about the inability to make a profit by the larger gas and fuel companies because the technique is not practical. Thereby not requiring Rich to pay back the loans and grants which WILL COST ME MONEY.”

Response:

As stated in Section 2.2, Congress established the CCPI Program with a specific goal—to accelerate commercial deployment of advanced coal-based technologies that can generate clean, reliable, and affordable electricity in the United States. Congress directed DOE to pursue this goal by providing partial funding for projects owned and controlled by non-federal-government participants. Thus, it is true that the proposed facilities would be partially funded using taxpayer dollars. However, DOE has no reason to expect that the proposed project would not be successful and that the financial assistance provided by DOE would not be repaid.

Comment 15-3

“The air quality to the prisoners at the SCI Mahanoy being locked in an environment next door to this monstrosity. What happens if as your report states that there is a 1 in 40 chance that an accident will occur with the system. What now happens to these inmates? What method of transportation will be used at what of time to evacuate them and to what place.”

Response:

Sect. 4.1.9.1 has been revised in response to this comment to more clearly describe the plan and program for emergencies that might arise from plant operations. The Emergency Response Program, which will be incorporated into the Risk Management Plan, will address the approach to be taken for plant emergencies. This program has yet to be developed and will be submitted to the EPA prior to plant operations as part of compliance with 40 CFR 68. Compliance with this regulation requires adequate protection of public health and safety. The process of developing the Risk Management Plan includes hazard identification, hazard analysis, and accident analysis. These analyses would address the potential consequences of a worst-case accident to the nearest off-site member of the public, and would identify necessary process controls, procedures, training, and audits. Also, revised Section 4.1.7.5 notes that the Schuylkill County Emergency Management Agency (SCEMA) would be responsible for evacuating nearby residents, if necessary. SCEMA, in conjunction with the Pennsylvania Emergency Management Agency, is in the process of developing a hazard mitigation plan for Schuylkill County.

See the response to Comment S2-5.

Comment 15-4

“The water usage and drainage of the Mahanoy mine pool. Draining this pool of 7 million gallons a day and replacing ½ of that amount must drain the pool which will allow the rotten timbers of the mines to collapse thereby creating subsidence in Mahanoy City and Gilberton”

Response:

EIS Section 4.1.3.3 addresses the potential for the proposed project to increase the chances of ground surface subsidence over the Gilberton mine pool. If timbers were used for roof support in mine openings that are near the ground surface, and therefore, could alternate between wet and dry as a result of increased pumping, then pumping from the mine pool might accelerate the deterioration of the timbers, and thus, might increase the possibility of subsidence. In Gilberton, at the axis of the Mahanoy Syncline (the approximate location of Long Row), the first mined coal seam is 200 to 300 ft below the ground surface (ARM Group Inc. 2005), and thus, is too deep to be temporarily dewatered by pumping from the mine pool. However, on the flanks of the syncline (both north and south of the railroad tracks), mined coal seams are closer to the surface, so some structures may be located over underground openings that are supported by timbers that would be subject to alternate wetting and drying due to pumping.

Mahanoy City, which is more than two miles east of the Gilberton mine pool, is unlikely to be affected by pumping from the Gilberton mine pool to supply water for the proposed facilities. As discussed in Section 3.4.3., the Tunnel Ridge mine pool below Mahanoy City is reported to be connected with the Boston Run and St. Nicholas mine pools, which are reported to be connected to the Gilberton mine pool, but a pumping test did not demonstrate a direct connection. Pumping of water from the Gilberton mine pool might affect the water level in the Tunnel Ridge mine pool, but because of the distance and the limited interconnection between the mine pools, any decline in the Tunnel Ridge mine pool water level would be much smaller than the water level decline in the Gilberton mine pool.

Also see the responses to comments P11-4 and P11-5.

Comment 15-5

“Excess water usage from other sources. If the mine pool is insufficient, water will be drawn from the water table thereby causing wells and reservoirs to go dry.”

Response:

Section 4.1.4.1 discusses the measures that could be implemented to avoid adverse impacts if the mine pool could not supply enough water for the proposed facilities.

Comment 15-6

“Finally, the air quality for my family and me and the damage to the environment including Locust Lake State Park and Tuscarora State Park. We are already experiencing poor air quality from the cogens and the ambient environment.”

Response:

The comment has been noted.

Comment 15-7

“Rich has stated that he will burn anything. Does that mean garbage, chemicals, hazardous waste, you name it.”

Response:

See response to comment S10-2.

Received @ NETL
opened 2/6/06

Daryl Davis
283 Pattersonville Rd.
Ringtown, PA 17967

Feb. 1, 2006

Janice L. Bell
NEPA Document Manager
U.S. Department of Energy
National Energy Technology Laboratory
M/S 58-247A
P.O. Box 10940
Pittsburgh, PA 15236

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).

16-1

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?] 16-2

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.

16-3

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.

16-4

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"?] 16-5

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?] 16-6

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.] 16-7

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.

16-8

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?

16-9

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?

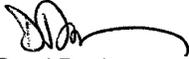
16-10

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.

16-11

Sincerely,



Daryl Davis

Davis, Daryl (16)

Comment 16-1

“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).”

Response:

The comment has been noted. Section 4.1.1.2 discusses the aesthetic impacts of the proposed facilities.

Comment 16-2

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

Response:

As discussed in Section 4.1.2.2, the facilities would not produce or emit ozone directly. Rather, ozone would be formed in the atmosphere by photochemical reactions involving VOCs and NO_x, both of which would be emitted by the facilities. The contribution of any individual emission source to ozone concentrations at any particular location cannot be readily quantified, but contributions can be assumed to be proportional to the emissions of either or both VOCs and NO_x. Since the proposed facilities’ emissions of both pollutants would be very small in comparison with total emissions from all sources in Schuylkill County, the proposed facilities’ potential contribution to ozone concentrations in the air also would be very small. See Section 4.1.2.2 for additional information.

Comment 16-3

“The EIS page 4-9 states:

‘[A] high percentage of hazardous air pollutants and trace elements in the synthesis gas would be removed, and 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 the 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 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.”

Response:

Additional information has been added to Section 4.1.2.2 on expected emissions of hazardous air pollutants. The quantity of any single hazardous air pollutant is expected to be less than 1 ton/year, which is considerably less than the Pennsylvania Department of Environmental Protection's permitted limit of 10 tons/year. Dioxins and furans are not expected to be present in the syngas or plant emissions because of the efficiency of the hot gas cleanup system that would be used.

Comment 16-4

"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."

Response:

As the commenter notes, the use of culm in the proposed facilities would be in addition to current uses of culm in the Gilberton Power Plant and other cogeneration stations in the area. In this EIS, DOE has attempted to identify and consider all of the potential environmental impacts of the proposed facilities, not just the beneficial impacts of accelerating culm cleanup. See Table 2.1.6, which compares the key operating characteristics of the existing plant and the proposed facilities.

Comment 16-5

"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'?"

Response:

More specific information on wastewater characteristics is now included and discussed in Sections 2.1.6 and 4.1.4.1. Also see the response to comment S2-1.

Comment 16-6

"[W]hat measures will be taken to ensure that all employees used in construction and day-to-day operation of the proposed plant are legally employed U. S. citizens?"

Response:

The project proponents and their subcontractors would be required to follow all applicable Federal and state laws relating to the employment of persons legally authorized to work in the United States.

Comment 16-7

“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.”

Response:

See response to comment S1-1.

Comment 16-8

“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.”

Response:

The use of slag or other project byproducts in mine reclamation would not merely replace culm with a new waste material. Pennsylvania Department of Environmental Protection approval would be required before slag or other solid residues from the proposed facilities could be used in mine reclamation (see Section 7.2). Pennsylvania Department of Environmental Protection would require comprehensive characterization data (including results of leaching tests) for the slag as a basis for its environmental evaluation under the residual waste regulations, and may require groundwater monitoring at sites where the material is approved for use (25 Pa. Code Chapter 287, Subpart H). Any placement of facility byproducts on mined land would need to be done in accordance with an approved mine reclamation plan designed to achieve environmental objectives. For example, the plan would include requirements for compaction, final contouring and revegetation. Additionally, the Pennsylvania Department of Environmental Protection regulations governing mine reclamation include provisions for liability insurance and performance bonds in order to assure financing to address potential adverse consequences.

Comment 16-9

“The EIS page 4-30 states:

‘Ash leachate concentration of all constituents except aluminum, antimony, arsenic, lead, and sulfate were also below the applicable drinking water Maximum Contamination 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 seem 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?”

Response:

Leaching tests would be done and the results would be evaluated by the Pennsylvania Department of Environmental Protection before any project waste or byproduct material could be placed in the environment. Because material placement would be in areas where groundwater is already contaminated due to past mining operations and is not used for water supply, there should be no impacts to water users. If adverse impacts occurred, financial responsibility for repairing adverse consequences from management of project residues would be assured through provisions of the laws and regulations enforced by the Pennsylvania Department of Environmental Protection.

Comment 16-10

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

Response:

Although DOE does not serve as a regulatory agency, if DOE decides to provide financial assistance, then DOE would expect WMPI PTY., LLC, to follow all applicable federal, state, and local environmental regulations. From a project management perspective, DOE would monitor the project through the terms of a financial assistance agreement.

Comment 16-11

“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 fund provide funding for this project.”

Response:

The comment has been noted.

Received @ NETL
opened 1/30/06
USDA

United States Department of Agriculture



One Credit Union Place, Suite 340, Harrisburg, PA 17110
717-237-2100 717-237-2238 fax

January 24, 2006

Ms. Janice L. Bell
National Energy Technology Laboratory
P.O. Box 10940
Pittsburg, PA 15236

Re:
Schuylkill County, PA

As requested in a letter dated January 4, 2006, we have reviewed the project location for possible areas of concern to the USDA Natural Resources Conservation Service.

Some of the soil mapping units in the project area are classified as hydric soils or could have inclusions of hydric soils; hydric soils being one indicator of the presence of wetlands. An on-site investigation should be done to determine the presence of wetlands.

Many of the soil mapping units in the project area are not classified as wetlands themselves, but may have small inclusions of wetlands within them that are too small to identify on a map at the scale of the soil survey map. An on-site investigation should be done to determine the presence of wetlands.

Soils in this area have been extensively altered over the years, and on-site investigations would be needed to determine the presence of any soil-related site limitations such as wetlands or unstable soils.

As for any project involving earthmoving, both temporary and permanent erosion and sedimentation control practices should be planned, implemented and maintained. We recommend consultation with appropriate county conservation districts for review of erosion and sedimentation control plans and practices.

Digital soils information for Schuylkill County and other Pennsylvania counties is also available on-line at <http://websoilsurvey.nrcs.usda.gov>.

Contact me at (717) 237-2218; FAX (717) 237-2238; email: timothy.emenheiser@pa.usda.gov if you need more information.


Tim Emenheiser
Resource Conservationist

17-1

cc: Dennis DiOrio, District Conservationist, Pottsville, PA

Emenheiser, Tim; U.S.D.A. Natural Resources Conservation Service, Harrisburg, PA (17)

Comment 17-1

“Some of the soil mapping units in the project area are classified as hydric soils or could have inclusions of hydric soils; hydric soils being one indicator of the presence of wetlands. An on-site investigation should be done to determine the presence of wetlands.

Many of the soil mapping units in the project area are not classified as wetlands themselves, but may have small inclusions of wetlands within them that are too small to identify on a map at the scale of the soil survey map. An on-site investigation should be done to determine the presence of wetlands.

Soils in this area have been extensively altered over the years, and on-site investigations would be needed to determine the presence of any soil-related site limitations such as wetlands or unstable soils.

As for any project involving earthmoving, both temporary and permanent erosion and sedimentation control practices should be planned, implemented and maintained. We recommend consultation with appropriate county conservation districts for review of erosion and sedimentation control plans and practices.

Digital soils information for Schuylkill County and other Pennsylvania counties is also available on-line at <http://websoilsurvey.nrcs.usda.gov>.”

Response:

An on-site investigation was conducted on May 12 to 14, 2003, to determine the presence of wetlands. The proposed WMPI property was examined by Mark Dilley a Professional Wetland Scientist certified by the Society of Wetland Scientists. A map of soil types in the area was obtained in advance from Ashley Spotts of the Pottsville Office of the Natural Resources Conservation Service (NRCS) Center. No hydric soils were listed on the map. It was noted that the Buchanan soils can contain hydric inclusions, but soils on the proposed site tend to be well drained due to its ridge-top location. The site was examined for presence of wetlands using the criteria of hydrology, hydric soils, and wetland vegetation, as specified in the 1987 Army Corps of Engineers Delineation Manual (Department of the Army 1987). No wetlands were found during the survey. A splash zone was found beneath an actively releasing steam valve, but the area did not meet the criteria of a wetland.

Erosion and sedimentation control plans would be developed prior to construction of the proposed project; the appropriate county conservation districts would be consulted for review.

SCHUYLKILL COUNTY INDUSTRIAL DEVELOPMENT AUTHORITY

P.O. Box 659
91 S. Progress Ave.
POTTSVILLE, PA 17901
TELEPHONE (570) 622-1943
FAX (570) 622-2903

S & DIRECTORS
JEL MAHALCHICK, CHAIRMAN
GE HALCOVAGE, JR., VICE CHAIRMAN
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January 25, 2006

Ms. Janice L. Bell
NEPA Document Manager
National Energy Technology Laboratory
P.O. Box 10940
MS 58/247A
Pittsburgh, PA 15236

Re: Draft Environmental Impact Statement
Gilberton Coal-to-Clean Fuels and Power Project

Dear Ms. Bell,

Please be advised that the Board of Directors of the Schuylkill County Industrial Development Authority (SCIDA) has voted to endorse the Draft Environmental Impact Statement, for the above referenced project, at its meeting of January 25, 2006. The Authority believes that moving the project to the demonstration stage of operation is in the best economic and energy policy interests of not just Schuylkill County but America as a whole.

SCIDA has played a role in financing 4 of the 5 co-generation projects located in Schuylkill County in the late 1980's and in several other anthracite fuel related projects as well. We do recognize the importance of the "Clean Coal Power Initiative" created by the Department of Energy and we strongly believe that this project will successfully demonstrate that anthracite, as a fuel stock, can and will play a critical role in our country's energy policy.

18-1

Please feel free to contact our office should you have any questions or require any assistance from the Authority with this project.

Respectfully,



Michael Mahalchick
Chairman



Frank J. Zukas
Executive Director

FJZ:lrr

CC: Schuylkill County Commissioners
Schuylkill County Legislative Delegation

Mahalchick, Michael and Zukas, Frank; Schuylkill County Industrial Development Authority (18)

Comment 18-1

“Please be advised that the Board of Directors of Schuylkill County Industrial Development Authority (SCIDA) has voted to endorse the Draft Environmental Impact Statement, for the above referenced project, at its meeting of January 25, 2006. The Authority believes that moving the project to the demonstrated stage of operation is in the best economic and energy policy interests of not just Schuylkill County but America as a whole.

SCIDA has played a role in financing 4 of the 5 co-generation projects located in Schuylkill County in the late 1980’s and in several other anthracite fuel related projects as well. We do recognize the importance of the “Clean Coal Power Initiative” created by the Department of Energy and we strongly believe that this project will successfully demonstrate that anthracite, as a fuel stock, can and will play a critical role in our country’s energy policy.”

Response:

The comments have been noted.

Received @ NETL, opened on 1/23/06

I

**Registered Attendance at Public Hearings for the
Draft Environmental Impact Statement (EIS)
Gilberton Coal-to-Clean Fuels and Power Project
Shenandoah, PA -- January 9, 2006
Pottsville, PA -- January 10, 2006**

Do you wish to be placed on the mailing list Yes
for the Final EIS and Record of Decision? No

Name: ED. J. SHEGANOSKI Address: P.O. BOX 1315
Affiliation: (UNION) WELDER (Retired) (MAIZEVILLE)
Telephone: (570) 874-0821 GILBERTON, PA. 17934

Comments: I have lived in the gilberton area since 1990. I've followed the building and operations of all 6 co-generation plants since 1988. I am a retired welder, and participated in site work, at the wheelabrator plant, in moroa, pa... the restoration, that these operations followed up with, turned bombed out craters and massive culm piles, into restored land, (CONT)

II

**Registered Attendance at Public Hearings for the
Draft Environmental Impact Statement (EIS)
Gilberton Coal-to-Clean Fuels and Power Project
Shenandoah, PA -- January 9, 2006
Pottsville, PA -- January 10, 2006**

(Cont.)

Do you wish to be placed on the mailing list Yes
for the Final EIS and Record of Decision? No

Name: Ed Sheganoski Address: 1315 main st.
Affiliation: gilberton, PA. 17934
Telephone: ~~these~~ these

Comments: in 18 years, this impact area's have abundant amounts of deer, squirrels, robins (as big as soft balls) cardinals, blue jays, duck & geese... my backyard is full of all the above... across the street, is the remainder of an old silt dam... every year since 1990, i D would walk my dog, and be amazed; (CONT)

19-1

III
(Cont.)

**Registered Attendance at Public Hearings for the
Draft Environmental Impact Statement (EIS)
Gilberton Coal-to-Clean Fuels and Power Project
Shenandoah, PA -- January 9, 2006
Pottsville, PA -- January 10, 2006**

Do you wish to be placed on the mailing list Yes
for the Final EIS and Record of Decision? No

| | |
|----------------------------|-------------------------------|
| Name: <i>ed Sheganoski</i> | Address: <i>1315 main st.</i> |
| Affiliation: | <i>gilberton, PA. 17934</i> |
| Telephone: | |

Comments: *at how, every year, hundreds of geese, would stop to (take-a-break) in the waters of this dam, fed with rain & run/off waters, from the top of Broad mt. (site of J.B. Rich - co/gen) the hard coal (anthracite) region's of N.E. PA, fueled the industrial revolution in the late 1800's & early 1900's... why can't they do it again? (cont.)*

19-1

IV
Cont

**Registered Attendance at Public Hearings for the
Draft Environmental Impact Statement (EIS)
Gilberton Coal-to-Clean Fuels and Power Project
Shenandoah, PA -- January 9, 2006
Pottsville, PA -- January 10, 2006**

Do you wish to be placed on the mailing list Yes
for the Final EIS and Record of Decision? No

| | |
|----------------------------|-------------------------------|
| Name: <i>ed Sheganoski</i> | Address: <i>1315 main st.</i> |
| Affiliation: | <i>gilberton, PA.</i> |
| Telephone: | <i>17934</i> |

Comments: *this area needs "a shot-in-the-arm"... as the world "goes to heel; in a handbasket", the economic aspects of mr. rich's project, will benefit this area & the united states, economically & environmentally... as the days go by, like wild horses, over the hills; all americans should remember, what built this great Country of ours: ANTHRACITE COAL: HARD COAL, ANTHRACITE WORKER'S...*

Sheganoski, Ed J. (19)

Comment 19-1

“I am a retired welder, and participated in site work, at the Wheelabrator Plant in Morea, PA ... the restoration that these operations followed up with, turned bombed out craters, and massive culm piles into restored land.

In 18 years these impact areas have abundant amounts of deer, squirrels, robins (as big as soft balls) cardinals, blue jays, duck and geese...my backyard is full of all the above. Across the street is the remainder of an old silt dam...every year since 1990, I would walk my dog, and be amazed at how every year hundreds of geese would stop to (take-a-break) in the waters of this dam, fed with rain and run-off water from the top of Broad Mountain”

Response:

The comments have been noted.

Received @ NETL, opened 1/13/06

**Registered Attendance at Public Hearings for the
Draft Environmental Impact Statement (EIS)
Gilberton Coal-to-Clean Fuels and Power Project
Shenandoah, PA -- January 9, 2006
Pottsville, PA -- January 10, 2006**

Do you wish to be placed on the mailing list Yes
for the Final EIS and Record of Decision? No

| | |
|---|----------------------------------|
| Name: <u>Allan Jones</u> | Address: <u>43 ST Ann STREET</u> |
| Affiliation: <u>Mahanoy Twp. Resident</u> | <u>Barnesville PA</u> |
| Telephone: <u>570 773-3987</u> | <u>18214</u> |

Comments: STRICTER REGULATIONS ON THE OMISSIONS OF POLLUTANTS THAT THIS PLANT IS GOING TO HAVE ALL STACKS, + WATER SUPPLIES REGULATED TO THE UTMOST MONITORING DEVICES SET ON AN EASTERLY LOCATION OF PLANT WHICH THE PREVAILING WINDS CARRY AT LEAST A 10% BOND BE IN PLACE BY READING ANTHR. TO ENSURE ANY WRONG DOING WILL MAKE THEM LIABLE FOR THEIR ACTION

} 20-1

Jones, Allan (20)

Comment 20-1

“Stricter regulations on the emissions of pollutants that this plant is going to have. All stacks and water supplies regulated to the utmost. Monitoring devices set on an easterly location of plant which the prevailing winds carry. At least a 10% bond be in place by Reading Anthracite to ensure any wrong doing will make them liable for their action.”

Response:

The comment has been noted. Additional monitoring stations have been installed at the Mahanoy State Prison, the Mahanoy City Sewage Treatment Plant, and the Frackville State Prison. DOE does not require bonding for projects in the CCPI.