

APPENDIX F

PUBLIC COMMENTS ON THE SUPPLEMENT TO THE DRAFT ENVIRONMENTAL IMPACT STATEMENT AND RESPONSES

Received 1-23-07

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

Robert J. Eckert Jr. BK2357
Box A
Bellefonte, PA 16823-0820
Friday, January 19, 2007

Re: Coal-To-Gas * John W. Rich Jr. / Not Pollutant New Resource

Dear Janice,

Good-day I was born & raised in coal country outside Pottsville, PA and 110% in favor of the proposed Coal-To-Oil Plant. John W. Rich Jr., President, WMPI PTY LLC, has done more benefit for the people of our Town, County, State which many of the knowledgeable are aware. Our Country can and will understand J.W. Rich Jr.'s benefits for generations to come.

Lets look at the bi-product carbon-dioxide generated in the Coal-To-Gas Plant as yet another potential resource instead of a problem. By collecting and storing this gas it can be used as a resource and marketed to produce entrepreneurs.

Who can use carbon-dioxide? How about the orchards and farmers throughout the Country and world. Tree's or any green plants collect diluted amounts of carbon-dioxide as a fuel to grow and as bi-product turn it into oxygen in the process.

This bi-product carbon-dioxide may be able to start a new revolution in the vegetable/fruit industries when they realize how easy is is to spray this important gas/fuel to stimulate their crop growth whereby their bi-product oxygen will be helping to supply the world needs.

J.W. Rich Jr. is our resource, do not allow the minority disgruntled ruin our national influence and important employer.

SUP1

Coal Is King



NOTE: For ease of cross-referencing between documents and other comments, comments on the Supplement to the Draft Environmental Impact Statement have been coded as SUP_-. The first number identifies the chronological order in which the comments were received. The second number, if used, identifies the order of the comments within the letter.

SUP1 01/23/07

Robert J. Eckert, Jr.

BK2357

Box A

Bellefonte, PA 16823-0820

Comment SUP1

“Good-day I was born & raised in coal country outside Pottsville, PA and 110% in favor of the proposed Coal-to-Oil Plant. John W. Rich, Jr. President, WMPI PTY LLC, has done more benefit for the people of our Town, County, State which many of the knowledgeable are aware. Our Country can and will understand J.W. Rich Jr.’s benefits for generations to come.

Lets look at the bi-product carbon-dioxide generated in the Coal-to-Gas Plant as yet another potential resource instead of a problem. By collecting and storing this gas it can be used as a resource and marketed to produce entrepreneurs.

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J.W. Rich Jr. is our resource, do not allow the minority disgruntled ruin our national influence and important employer.

Coal is King

Response:

The comment has been noted. In order to be accurate, it should be noted that the industrial participant for the proposed project has informed DOE that sale of the CO₂ byproduct would not occur in the foreseeable future. Rather, CO₂ captured as part of the process would be vented to the atmosphere.

Received @ NETL 1/24/07

1/21/07

Dear Mrs. Bell,

I have recently read an article in my local newspaper, *The News-Item*, about the Cidderton Coal-to-Liquid Fuels and Power Project. My letter is in response to that article. The amount of pollutants to be released by the plant is not reasonable. I understand industry is needed in our area and this plant will play a crucial role, but responsibility must be taken to reduce the pollutants. There is money to be made in this specific aspect of the coal industry. Why then, can't this money be reinvested into air filters and new and initiative ways to combat air pollutants? The Kyoto Protocol is being enforced in many other nations. The only way for this to happen in the U.S. is to start, plant by plant, and enforce strict air pollutant laws. The environment is a valuable thing to us all, something we all depend on. It is also something we must all care for.

Kathie Weaver

SUP2

SUP2 01/25/07

Kallie Weaver
819 N. Washington Street
Shamokin, PA 17872

Comment SUP2

I have recently read an article in my local newspaper about the Gilberton Coal-to-Clean Fuels and Power Project. My letter is in response to that article. The amount of pollutants to be released by the plant is not reasonable. I understand industry is needed in our area and the plant will play a crucial role, but responsibility must be taken to reduce the pollutants. There is money to be made in this specific aspect of the coal industry. Why then, can't this money be reinvested into air filters and new and initiative ways to combat air pollutants? The Kyoto Protocol is being enforced in many other nations. The only way for this to happen in the U.S. is to start, plant by plant, and enforce strict air pollutant laws. The environment is a valuable thing to us all, something we all depend on. It is also something we must all care for.

Response:

The EIS has evaluated air emissions from the proposed project and concluded that air quality would not be degraded by the regulated pollutants, such as sulfur oxides and nitrogen oxides. Carbon dioxide is not a regulated pollutant, and is not a concern for local air quality. As a result, DOE's assessment of the potential impacts of this compound is based on the contribution of the proposed project to the global carbon dioxide budget, rather than a comparison to standards.

Received@NETL
1/25/07

Dear Ms. Janice Bell,

I am writing to voice my concerns over the proposed coal to oil plant that is to be built in Schuylkill County. With the current information that is available on global warming, and the staggering numbers given on the amount of carbon dioxide that would be released into our atmosphere, I strongly object to such a facility being built. Until there is a thoroughly researched plan to reduce/eliminate the carbon dioxide produced, I feel that the risks of such a plant outweigh the benefits. Thank you for your consideration in this matter.

SUP3

Sincerely,

Deena and Andrew Ullomy
138 Quotasa Road
Shenandoah, PA
17976

SUP3 01/25/07

Debra and Andrew Ulicny
138 Swatara Road
Shenandoah, PA 17976

Comment SUP3

“I am writing to voice my concerns over the proposed coal to oil plant that is to be built in Schuylkill County. With the current information that is available on global warming, and the staggering numbers given on the amount of carbon dioxide that would be released into our atmosphere, I strongly object to such a facility being built. Until there is a thoroughly researched plan to reduce/eliminate the carbon dioxide produced, I feel that the risks of such a plant outweigh the benefits. Thank you for your consideration in this matter.”

Response:

The comments have been noted. While the proposed project would concentrate the CO₂ stream exiting the gas cleanup system, the industrial participant plans to vent this stream to the atmosphere. The project, as proposed to DOE, does not include the sequestration of carbon dioxide emissions. However, DOE's National Energy Technology Laboratory (NETL) manages a portfolio of laboratory and field research and development projects focused on technologies with potential for reducing greenhouse gas emissions and controlling global climate change. Most efforts focus on developing technologies to capture CO₂ from large stationary sources, such as power plants, and storing it in geologic sinks such as saline formations, unmineable coal seams, and depleted oil and gas fields. DOE is also researching methods to enhance carbon sequestration in terrestrial ecosystems. The control of fugitive methane emissions from coal mines and landfills is also addressed in the R&D program. The DOE Carbon Sequestration Program works directly to implement the President's Global Climate Change Initiative, as well as several National Energy Policy goals targeting the development of new technologies. DOE's Carbon Sequestration Program also supports the goals of the Framework Convention on Climate Change and other international collaborations to reduce greenhouse gas intensity and greenhouse gas emissions. The programmatic timeline is to demonstrate a portfolio of safe, cost effective greenhouse gas capture, storage, and mitigation technologies by 2012, leading to future deployment opportunities beyond 2012.

Received @ DER 1/29/07

Dear Ms. Janice Bell,

I am writing to voice my concerns over the proposed coal to oil plant that is to be built in Schuylkill County. With the current information that is available on global warming, and the staggering numbers given on the amount of carbon dioxide that would be released into our atmosphere, I strongly object to such a facility being built. Until there is a thoroughly researched plan to reduce/eliminate the carbon dioxide produced, I feel that the risks of such a plant outweigh the benefits. Thank you for your consideration in this matter.

SUP4

Sincerely,

Nancy Costa
224 N 2nd St.
Frackville PA
17931

SUP4 01/29/07

Nancy Costa
224 N. 2nd Street
Frackville, PA 17931

Comment SUP4

"I am writing to voice my concerns over the proposed coal to oil plant that is to be built in Schuylkill County. With the current information that is available on global warming, and the staggering numbers given on the amount of carbon dioxide that would be released into our atmosphere, I strongly object to such a facility being built. Until there is a thoroughly researched plan to reduce/eliminate the carbon dioxide produced, I feel that the risks of such a plant outweigh the benefits. Thank you for your consideration in this matter."

Response:

See response to SUP3.

Revised J@ NETL
1/29/07

Dear Ms. Janice Bell,

I am writing to voice my concerns over the proposed coal to oil plant that is to be built in Schuylkill County. With the current information that is available on global warming, and the staggering numbers given on the amount of carbon dioxide that would be released into our atmosphere, I strongly object to such a facility being built. Until there is a thoroughly researched plan to reduce/eliminate the carbon dioxide produced, I feel that the risks of such a plant outweigh the benefits. Thank you for your consideration in this matter.

SUP5

Sincerely,

Joanne and Robert Berresford
15 Radio Station Rd.
Shenandoah, PA 17976

SUP5 01/29/07

Joanne and Robert Berresford
15 Radio Station Road
Shenandoah, PA 17976

Comment SUP5

"I am writing to voice my concerns over the proposed coal to oil plant that is to be built in Schuylkill County. With the current information that is available on global warming, and the staggering numbers given on the amount of carbon dioxide that would be released into our atmosphere, I strongly object to such a facility being built. Until there is a thoroughly researched plan to reduce/eliminate the carbon dioxide produced, I feel that the risks of such a plant outweigh the benefits. Thank you for your consideration in this matter."

Response:

See response to SUP3.

Received @ NBTZ
1/23/07 11:29 107

I

Att: Janice L. Bell:

I have a few questions to ask about the Jack Rock Coal to Oil Plant.

I. Since when do you or anyone else have the authority to establish level of tolerances for anyone?

How dare you tell anyone how much pollution they can endure.

II. Do you want to buy my home? It will be worth less than it is now if this plant is built.

III. Why doesn't the Department of Energy send some of your families to live here?

The pollution from the Co. Gen Plants we have here now spreads for around 50 miles from where they are located. This was brought to the attention of the Dept. of Energy by the people that attended the focus meetings in Shenandoah, Pa. and also Pottsville, Pa.

I have all the information about how building this plant will destroy the area around Shenandoah, Mahanoy Crt, Gilberton, Pottsville, Quakertown, Ashland and Hometown just to mention a few.

over

SUP6

IV

#4.V: Are you people insane,
or are you simply book
smart and life dumb?

I am totally against the
construction of this plant. I
also know the thousands of
letters like mine, you will
simply do with them as you
please. (Waste basket.)

#5.V: What ever happened to
Liberty and Justice for All?
At gosh like this, Liberty and
Justice for All, that can afford
to pay for it.

As a Government of the People,
By the People and for the
People, you should listen
to the voice of the People.
They don't want this plant
near here. Put it in your
own backyard and see how
much you like what you are
forcing down our throats.

SUP6

1/23/07

III

V What we need is another Erin Brockovich to bring you people to your knees, just the way you are doing to us. I guess when people lose their conscience nothing matters anymore because that is exactly what happened to the America I once served. The Germans tried this process sixty years ago and found out it doesn't work. Please don't tell me new improvements have been made since then. If they have been made, then you shouldn't have any objections to building this plant where you live and not here.

SUP6

Ronald Yodis
123 S. White St
Shenandoah, Pa
17976-2374

SUP6 01/29/07

Ronald Yodis
123 S. White St.
Shenandoah, PA 17976-2374

Comment SUP6

I have a few questions to ask about the Jack Rich Coal to Oil Plant.

I Since when do you or anyone else have the authority to establish levels of tolerance for anyone? How dare you tell anyone how much pollution they can endure.

#II Do you want to buy my home? It will be worth less than it is now if this plant is built.

#III Why doesn't the Department of Energy send some of your families to live here?

The pollution from the Co Gen Plants we have here now spreads for around 50 mile from where they are located. This was brought to the attention of the Dept. of Energy by the people that attended the farce meetings in Shenandoah, PA and also Pottsville, PA.

I have all the information about how building this plant will destroy the area around Shenandoah, Mahanoy City, Gilberton, Frackville, Girardsville, Ashland, and Hometown just to name a few.

IV Are you people insane, or are you simply book smart and life dumb? I am totally against the construction of this plant. I also know the thousands of letters like mine; you will simply do with them as you please (waste basket)

#V What ever happened to liberty and justice for all? It goes like this. Liberty and justice for all, that can afford to pay for it.

As a government of the people, by the people, and for the people, you should listen to the voice of the people. They don't want this plant near here. Put it in your own backyard and see how much you like what you are forcing down our throats.

#V What we need is another Erin Brockovich to bring you people to your knees, just the way you are doing to us. I guess when people lose their conscience nothing matters anymore because that is exactly what happened to the America I once served. The Germans tried this process sixty years ago and found out it doesn't work. Please don't tell me new improvements have been made since then. If they have been made, then you shouldn't have any objections to building this Plant where you live and not here.

Response:

The comments have been noted. The potential impacts of the proposed project, both individually and in combination with other nearby power plants, are quantified and discussed in final EIS Sections 4.1.2.2, 5.1.4, and 6.1.

DOE does not establish levels of tolerance to pollution. Rather, as noted in final EIS Section 7, if constructed, the project would operate according to Federal, state, and local laws and regulations. The proposed project would be subject to the requirements of air and water permits issued by the Pennsylvania Department of Environmental Protection and the Susquehanna River Basin Commission.

Received @ NETL
1/29/07

Dear Ms. Janice Bell,

I am writing to voice my concerns over the proposed coal to oil plant that is to be built in Schuylkill County. With the current information that is available on global warming, and the staggering numbers given on the amount of carbon dioxide that would be released into our atmosphere, I strongly object to such a facility being built. Until there is a thoroughly researched plan to reduce/eliminate the carbon dioxide produced, I feel that the risks of such a plant outweigh the benefits. Thank you for your consideration in this matter.

SUP7

Sincerely,


Shenandoah, PA
17976

SUP7 1/29/07

Joseph M. Hayes
Shenandoah, PA 17976

Comment SUP7

“I am writing to voice my concerns over the proposed coal to oil plant that is to be built in Schuylkill County. With the current information that is available on global warming, and the staggering numbers given on the amount of carbon dioxide that would be released into our atmosphere, I strongly object to such a facility being built. Until there is a thoroughly researched plan to reduce/eliminate the carbon dioxide produced, I feel that the risks of such a plant outweigh the benefits. Thank you for your consideration in this matter.”

Response:
See response to SUP3.

Received @ DETL 1/29/07
Mary Noon
50 OAK Lane
Pottsville, PA 17901
Jan. 27, 2007

Dear Ms. Janice Bell,

I am writing to voice my concerns over the proposed coal to oil plant that is to be built in Schuylkill County With the current information that is available on global warming, and the Staggering numbers given on the amount of carbon dioxide that would be released into our atmosphere, I strongly object to such a facility being built. Until there is a thoroughly researched plan to reduce/eliminate the carbon dioxide produced, I feel that the risks of such a plant outweigh the benefits. Thank you for your consideration in this matter.

SUP8

Sincerely,
Mary C. Noon

SUP8 1/29/07
Mary Noon
50 Oak Lane
Pottsville, PA 17901

Comment SUP8

“I am writing to voice my concerns over the proposed coal to oil plant that is to be built in Schuylkill County. With the current information that is available on global warming, and the Staggering numbers given on the amount of carbon dioxide that would be released into our atmosphere, I strongly object to such a facility being built. Until there is a thoroughly researched plan to reduce/eliminate the carbon dioxide produced, I feel that the risks of such a plant outweigh the benefits. Thank you for your consideration in this matter.”

Response:
See response to SUP3.

Received @ NETL
2/5/07

Dear Ms. Janice Bell,

I am writing to voice my concerns over the proposed coal to oil plant that is to be built in Schuylkill County. With the current information that is available on global warming, and the staggering numbers given on the amount of carbon dioxide that would be released into our atmosphere, I strongly object to such a facility being built. Until there is a thoroughly researched plan to reduce/eliminate the carbon dioxide produced, I feel that the risks of such a plant outweigh the benefits. Thank you for your consideration in this matter.

SUP9

Sincerely,

Nicole Ulicny
104 Cadwalader Circle
Exton PA 19341

SUP9 2/5/07

Nicole Ulicny
104 Cadwalader Circle
Exton, PA 19341

Comment SUP9

“I am writing to voice my concerns over the proposed coal to oil plant that is to be built in Schuylkill County. With the current information that is available on global warming, and the staggering numbers given on the amount of carbon dioxide that would be released into our atmosphere, I strongly object to such a facility being built. Until there is a thoroughly researched plan to reduce/eliminate the carbon dioxide produced, I feel that the risks of such a plant outweigh the benefits. Thank you for your consideration in this matter.”

Response:

See response to SUP3.

Received @ NETL
2/7/07

Dear Ms. Janice Bell,

I am writing to voice my concerns over the proposed coal to oil plant that is to be built in Schuylkill County. With the current information that is available on global warming, and the staggering numbers given on the amount of carbon dioxide that would be released into our atmosphere, I strongly object to such a facility being built. Until there is a thoroughly researched plan to reduce/eliminate the carbon dioxide produced, I feel that the risks of such a plant outweigh the benefits. Thank you for your consideration in this matter.

SUP10

Sincerely,

Stephen Ulicny
347 Hazle Street
Tamaqua, PA 18252

SUP10 2/7/07
Stephen Ulicny
347 Hazle Street
Tamaqua, PA 18252

Comment SUP10

“I am writing to voice my concerns over the proposed coal to oil plant that is to be built in Schuylkill County. With the current information that is available on global warming, and the staggering numbers given on the amount of carbon dioxide that would be released into our atmosphere, I strongly object to such a facility being built. Until there is a thoroughly researched plan to reduce/eliminate the carbon dioxide produced, I feel that the risks of such a plant outweigh the benefits. Thank you for your consideration in this matter.”

Response:
See response to SUP3.

Received @ NETL
2/7/07

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SUP11

Sincerely,

Anne Ulicny
18 S. Emerick St.
Shenandoah, PA 17976

SUP11 2/7/07

Anne Ulicny
18 S. Emerick Street
Shenandoah, PA 17976

Comment SUP11

"I am writing to voice my concerns over the proposed coal to oil plant that is to be built in Schuylkill County. With the current information that is available on global warming, and the staggering numbers given on the amount of carbon dioxide that would be released into our atmosphere, I strongly object to such a facility being built. Until there is a thoroughly researched plan to reduce/eliminate the carbon dioxide produced, I feel that the risks of such a plant outweigh the benefits. Thank you for your consideration in this matter."

Response:

See response to SUP3.

Received @ NETL
2/7/07

Dear Ms. Janice Bell,

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SUP12

Sincerely,

Michael Ulicny
304 W Walnut Street
Valley View, PA 17983

SUP12 2/7/07

Michael Ulicny
309 W Walnut St
Valley View, PA 17983

Comment SUP12

“I am writing to voice my concerns over the proposed coal to oil plant that is to be built in Schuylkill County. With the current information that is available on global warming, and the staggering numbers given on the amount of carbon dioxide that would be released into our atmosphere, I strongly object to such a facility being built. Until there is a thoroughly researched plan to reduce/eliminate the carbon dioxide produced, I feel that the risks of such a plant outweigh the benefits. Thank you for your consideration in this matter.”

Response:

See response to SUP3.

Received @ NETL
2/7/07

Dear Ms. Janice Bell,

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SUP13

Sincerely,

Mr. & Mrs. Robert Taylor
2 Radio Station Road
Shenandoah Pa. 17976

SUP13 2/7/07

Mr. and Mrs. Robert Taylor
2 Radio Station Road
Shenandoah, PA 17976

Comment SUP13

“I am writing to voice my concerns over the proposed coal to oil plant that is to be built in Schuylkill County. With the current information that is available on global warming, and the staggering numbers given on the amount of carbon dioxide that would be released into our atmosphere, I strongly object to such a facility being built. Until there is a thoroughly researched plan to reduce/eliminate the carbon dioxide produced, I feel that the risks of such a plant outweigh the benefits. Thank you for your consideration in this matter.”

Response:

See response to SUP3.

- Received @ Non 2/7/07

Dear Ms. Janice Bell,

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SUP14

Sincerely,

Mr. Frank B. Ulicny
411 Roosevelt Drive
Mahanoy City Pa. 17948

SUP14 2/7/07

Mr. Frank B. Ulicny
411 Roosevelt Drive
Mahanoy City, PA 17948

Comment SUP14

“I am writing to voice my concerns over the proposed coal to oil plant that is to be built in Schuylkill County. With the current information that is available on global warming, and the staggering numbers given on the amount of carbon dioxide that would be released into our atmosphere, I strongly object to such a facility being built. Until there is a thoroughly researched plan to reduce/eliminate the carbon dioxide produced, I feel that the risks of such a plant outweigh the benefits. Thank you for your consideration in this matter.”

Response:

See response to SUP3.

Received @ NE
2/7/07

Dear Ms. Janice Bell,

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SUP15

Sincerely,

Pete Ulicny

18 S. EMERICK

SHENANDOAH, PA 17976

SUP15 2/7/07

Pete Ulicny
18 S. Emerick Street
Shenandoah, PA 17976

Comment SUP15

“I am writing to voice my concerns over the proposed coal to oil plant that is to be built in Schuylkill County. With the current information that is available on global warming, and the staggering numbers given on the amount of carbon dioxide that would be released into our atmosphere, I strongly object to such a facility being built. Until there is a thoroughly researched plan to reduce/eliminate the carbon dioxide produced, I feel that the risks of such a plant outweigh the benefits. Thank you for your consideration in this matter.”

Response:

See response to SUP3.

>>> "Rebekah Feeser" <rebekahfeeser@mac.com> 1/13/2007 9:09 AM
>>> Dear Ms. Bell,

I am appalled by this "omission," "error," or however it is being coined by the industry. Though as a committed citizen, mother, and professional residing in Pennsylvania, I am against ANY additional toxins being emitted into the environment, I am profoundly appalled by the significant difference between the originally stated "832,000 tons per year" and the actual "1,450,000 tons per year." This is outrageous and the sort of "mistake" that makes it difficult to believe any organization will have the best interests and health needs of those most impacted in mind. What might be the next "omission"? I am therefore even more opposed to the proposed Gilberton Coal-to-Clean Fuels and Power Project (DOE/EIS-0357D-S1).

SUP16

Thank you for accepting and sharing my comment.

Sincerely,
Rebekah L. Feeser, Ph.D.

SUP16 1/13/07
Rebekah Feeser

Comment SUP16

"I am appalled by this "omission," "error," or however it is being coined by the industry. Though as a committed citizen, mother, and professional residing in Pennsylvania, I am against ANY additional toxins being emitted into the environment, I am profoundly appalled by the significant difference between the originally stated "832,000 tons per year" and the actual "1,450,000 tons per year." This is outrageous and the sort of "mistake" that makes it difficult to believe any organization will have the best interests and health needs of those most impacted in mind. What might be the next "omission"? I am therefore even more opposed to the proposed Gilberton Coal-to-Clean Fuels and Power Project (DOE/EIS-0357D-S1).

Thank you for accepting and sharing my comment."

Response:

The comment has been noted. Carbon dioxide is not a toxin, but rather was evaluated in the EIS from the standpoint of its effect on global climate change. A draft EIS is used to solicit public comments about the potential impacts of a proposed action and to develop accurate information needed to make an assessment. If significant new information is made available relative to environmental concerns, DOE may supplement an EIS to further the purposes of NEPA, in accordance with 40 CFR 1502.9(c)(2).

The following comments are submitted in response to the Supplemental Environmental Impact Statement (SEIS), which disclosed that significantly higher levels of CO2 will be produced by the proposed coal-to-oil plant in Morea, Pa.

In addition to the other harmful impacts of WMPI's proposed coal-to-oil plant, the revised projection of CO2 produced by this plant is unacceptably high. Approximately 2.4 million tons of CO2 would be released annually into the atmosphere throughout the plant's 50-year lifespan. The DOE's SEIS clearly states that none of the CO2 will be captured or sequestered underground. Of particular concern is the fact that the multiple process of the proposed coal-to-oil plant would produce 1.8 times or 80% more CO2 than if the culm were simply burned. In other words, the proposed plant is 80% less efficient than technology currently available in regards to the ratio of CO2 produced for the amount of culm burned.

SUP17-1

This news comes at a time when the world's scientific community has reached a consensus that increased levels of CO2 in the earth's atmosphere are a direct cause of global warming, or global climate change. If CO2 levels continue to rise unchecked, we know that the social and economic consequences on the earth's human population will be devastating. The trend in rising CO2 levels must be reversed. The time to act is now.

The U.S. Climate Action Partnership is a coalition of major U.S. companies including Alcoa, BP America, Caterpillar, Duke Energy, FPL Group, General Electric, Lehman Brothers, PG&E, PNM Resources and Dupont, along with leading environmental organizations including Environmental Defense, Natural Resources Defense Council, Pew Center on Global Climate Change and World Resources Institute. The Partnership recently issued "A Call for Action" report, calling on the federal government to create a national program to reduce significantly the greenhouse gas emissions in the U.S. The group is calling for the federal government to create a "mandatory, flexible climate change program." According to the report, "Each year we delay action to control emissions increases the risks of unavoidable consequences that could necessitate even steeper reductions in the future, at potentially greater economic cost and social disruption."

SUP17-2

The U.S. business community is asking for a national program to reduce greenhouse gas emissions. They want to plan for the future and believe U.S. businesses can successfully reduce greenhouse gas emissions while continuing to operate profitably. In addition, the Northeast and Mid-Atlantic states are pursuing the creation of a carbon cap and trade system. Such a solution seems so likely that some companies are beginning to factor in the cost of a cap and trade system in their budget projections.

The DOE has a responsibility to fund projects that implement technology like CO2 scrubbers to significantly reduce greenhouse gas emissions, and a responsibility NOT TO FUND projects like WMPI's proposed coal-to-oil plant, which would produce CO2 at a rate 80% higher than culm-burning cogeneration plants currently in existence. By providing federal funding for this proposed project, DOE will give WMPI an unfair competitive advantage over U.S. companies that are planning and budgeting for significant reduction of greenhouse gas emissions. Funding WMPI's project will, in effect, discourage companies from investing now in technology to reduce greenhouse gas emissions in the future.

SUP17-3

We respectfully urge DOE to take the no action alternative. Do not provide \$100 million in federal funding to WMPI's proposed coal-to-oil plant. DOE should invest instead in projects that will help the U.S. to meet reduced levels of greenhouse gas emissions in the future.

Sincerely,

Helen Sluzis

Edward Sluzis
206 Roosevelt Drive (Morea)
Mahanoy City, PA 17948

SUP17 2/20/07

Helen and Edward Sluzis
206 Roosevelt Drive (Morea)
Mahanoy City, PA 17948

Comment SUP17-1

"The following comments are submitted in response to the Supplemental Environmental Impact Statement (SEIS), which disclosed that significantly higher levels of CO₂ will be produced by the proposed coal-to-oil plant in Morea, Pa.

In addition to the other harmful impacts of WMPI's proposed coal-to-oil plant, the revised projection of CO₂ produced by this plant is unacceptably high. Approximately 2.4 million tons of CO₂ would be released annually into the atmosphere throughout the plant's 50-year lifespan. The DOE's SEIS clearly states that none of the CO₂ will be captured or sequestered underground. Of particular concern is the fact that the multiple process of the proposed coal-to-oil plant would produce 1.8 times or 80% more CO₂ than if the culm were simply burned. In other words, the proposed plant is 80% less efficient than technology currently available in regards to the ratio of CO₂ produced for the amount of culm burned.

Response:

The total amount of CO₂ emissions released by processing coal at the proposed coal-to-liquids plant and using the resulting liquid fuel in a vehicle would be essentially the same as would be released from burning the same coal in a conventional coal-fired power plant. The amount of CO₂ released is determined by the amount of carbon in the coal. It appears that the commenters have misinterpreted the discussion regarding CO₂ emissions in Section 6.1. The comparison that the comment refers to is between a coal-based fuel cycle and a petroleum-based fuel cycle rather than coal processed in a coal-to-liquids plant and a conventional coal plant. As discussed in Section 6.1, the coal-to-liquids fuel cycle (including all steps from mining the coal to using the liquid fuel in a vehicle) is estimated to produce 80% more CO₂ emissions than the conventional petroleum-based liquid fuel cycle (including all steps from the oil well to the vehicle).

Comment SUP17-2

"This news comes at a time when the world's scientific community has reached a consensus that increased levels of CO₂ in the earth's atmosphere are a direct cause of global warming, or global climate change. If CO₂ levels continue to rise unchecked, we know that the social and economic consequences on the earth's human population will be devastating. The trend in rising CO₂ levels must be reversed. The time to act is now.

The U.S. Climate Action Partnership is a coalition of major U.S. companies including Alcoa, BP America, Caterpillar, Duke Energy, FPL Group, General Electric, Lehman Brothers, PG&E, PNM Resources and Dupont, along with leading environmental organizations including Environmental Defense, Natural Resources Defense Council, Pew Center on Global Climate Change and World Resources Institute. The Partnership recently issued "A Call for Action" report, calling on the federal government to create a national program to reduce significantly the greenhouse gas emissions in the U.S. The group is calling for the federal government to create a "mandatory, flexible climate change program." According to the report, "Each year we delay action to control emissions increases the risks of unavoidable consequences that could necessitate even steeper reductions in the future, at potentially greater economic cost and social disruption.

The U.S. business community is asking for a national program to reduce greenhouse gas emissions. They want to plan for the future and believe U.S. businesses can successfully reduce greenhouse gas emissions while continuing to operate profitably. In addition, the Northeast and Mid-Atlantic states are pursuing the creation of a carbon cap and trade system. Such a solution seems so likely that some companies are beginning to factor in the cost of a cap and trade system in their budget projections."

Response:

At the time this final EIS is being issued, the recommendations of the United States Climate Action Partnership (contained in the cited report) have not been incorporated into U.S. law or policy. At present, carbon dioxide is not a regulated pollutant. As a result, there are no established limits on the emissions of this gas. The proposed project would incorporate CO₂ capture (concentrating the CO₂ stream exiting the gas cleanup system), which is the first step of carbon capture and storage/sequestration. Thus, the possibility would exist to add CO₂ storage/sequestration at a later time, as the necessary technology matures.

Comment SUP17-3

"The DOE has a responsibility to fund projects that implement technology like CO₂ scrubbers to significantly reduce greenhouse gas emissions, and a responsibility NOT TO FUND projects like WMPI's proposed coal-to-oil plant, which would produce CO₂ at a rate 80% higher than culm-burning cogeneration plants currently in existence. By providing federal funding for this proposed project, DOE will give WMPI an unfair competitive advantage over U.S. companies that are planning and budgeting for significant reduction of greenhouse gas emissions. Funding WMPI's project will, in effect, discourage companies from investing now in technology to reduce greenhouse gas emissions in the future.

We respectfully urge DOE to take the no action alternative. Do not provide \$100 million in federal funding to WMPI's proposed coal-to-oil plant. DOE should invest instead in projects that will help the U.S. to meet reduced levels of greenhouse gas emissions in the future."

Response:

The comments have been noted. Also see the response to comment SUP17-1.

Received 2/12/07
10, 2007

Dear [redacted],

Thank you for your
consideration and time.
Concerning the proposed
coal to oil plant in Hittenton,
Pa; it is a "no brainer"
as to whether it should be
built or not.

All the facts prove how
harmful it would be to
human, animals and the
environment.

Enclosed please find
a clipping containing very
disturbing facts! Our children

Ms. Joan Chesonis
210 Arizona Ave
Shenandoah PA 17976

deserve to breathe clean
air and drink clean water
and grow up healthy.

Please help to stop the
further exploitation of our
once beautiful country.

The river towns and develop-
ers have already gained
much and given back dirt,
noise and very harmful
pollution.

Respectfully,
Joan Chesonis

SUP18

Study: Low-level toxicants harm developing brains

BY JAMIE TALAN
NEWSDAY

Low levels of mercury and lead exposure can damage developing brain cells — a finding that might help explain how these toxicants can lead to a host of mental and medical problems, a new study said.

"There is a huge problem in toxicology," said Mark Noble, a professor of biomedical genetics and neurobiology at the University of Rochester in New York and senior author of the study in the journal PLoS Biology. "There are 80,000 to 150,000 environmental toxicants about which we know nothing. Nobody knows how to screen for them or even where to start."

His study could be a major step in identifying methods of prevention and treatment.

Noble and his colleagues conducted their work in the laboratory, where they subjected so-called glial

"This needs to be taken very seriously."

Mark Noble

Professor of biomedical genetics and neurobiology

progenitor stem cells in the brain to low levels of lead and mercury. They found that these brain cells stopped dividing. They simply shut down. The mercury levels previously were thought to be safe in humans, Noble said. "It turns out they are not."

"These levels — 5 to 6 parts per billion — have adverse effects on these progenitor stem cells," he said.

These cells are crucial in building the brain during infancy and beyond.

Noble said studies have shown that between 300,000

and 600,000 babies are born each year with fetal mercury levels in cord blood that are 5 to 6 parts per billion.

The researchers found that progenitor stem cells — the brain's support cells that carry out a number of key housekeeping functions — are extraordinarily vulnerable to low levels of toxicants, in the test tube,

as many as 25 percent of the progenitor cells obtained from rats shut down when exposed to the low levels of lead or mercury.

When the researchers looked at the cellular pathways affected by these exposures, they found the toxicants were disrupting cell function by increasing oxidative stress. All the toxicants they've studied led to the same oxidative stress-producing pathway. If

similar processes are taking place in the developing brain of the fetus and child, this could certainly have adverse effects, Noble said.

TAKEN FROM POTTSVILLE (PA) REPUBLICAN & HERALD
FRIDAY FEBRUARY 9-2007

SUP18 2/12/07

Joan Chesonis

210 Arizona Avenue

Shenandoah, PA 17976-1204

Comment SUP18

"Thank you for your consideration and time. Concerning the proposed coal oil plant in Gilberton, PA; it is a "no-brainer" as to whether it should be built or not. All the facts prove how harmful it would be to humans, animals, and the environment. Enclosed please find a clipping containing very disturbing facts! Our children deserve to breathe clean air and drink clean water and grow up healthy. Please help to stop the further exploitation of our once beautiful county. The investors and developers have already gained much and given back dirt, noise, and very harmful pollution.

(This letter was accompanied by a newspaper clipping that reported that low levels of mercury and lead can damage developing brain cells.)

Response:

The comments have been noted. The potential impacts on air quality of the proposed project, in combination with other projects/other power plants in the Schuylkill County area, were modeled in EIS Section 4.1.2.2.

PDF file.



United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Custom House, Room 244
200 Chestnut Street
Philadelphia, Pennsylvania 19106-2904



February 20, 2007

ER 07/45

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

Dear Ms. Bell:

The Department of the Interior (Department) has no comment on the U.S. Department of Energy's Draft Supplemental Environmental Impact Statement for the Gilberton Coal to Clean Power Project located in Schuylkill County, Pennsylvania.

SUP19

Thank you for the opportunity for comment.

Sincerely,

Michael T. Chezik
Regional Environmental Officer

SUP19 2/20/07

Michael Chezik
Office of Environmental Policy and Compliance
U.S. Department of the Interior
Philadelphia, PA 19106-2904

Comment SUP19

"The Department of Interior (Department) has no comment on the U.S. Department of Energy's Draft Supplemental Environmental Impact Statement for the Gilberton Coal to Clean Power Project located in Schuylkill County, Pennsylvania."

Response:

Your letter has been noted.

Ms. Janice L. Bell
National Environmental Policy Act Document Mgr.
U.S. Department of Energy
National Energy Technology Laboratory
626 Cochrans Mill Road
P.O. Box 10940
Pittsburgh, PA 15236-0940

RE: Comments on Supplement to the Draft EIS for the Gilberton Coal-To-Clean Fuels and Power Project, Gilberton PA

February 27, 2007

Dear Ms. Bell,

My wife and I are a part of NRDC's 35,000 non profit statewide membership organization. We are both avidly committed as no nonsense participants in protecting the global ecosystem coupled with preservation of our natural resources. This is not only our mission and goal in life, it is our mission and goal to save our life. So in these endeavors we mean business.

In pursuit of my research , allow me to jump around here a bit in making my comments concerning the SDEIS.

Section 4 Environmental Consequences
Page 2 - RE: Global Climate Change

In this section they cavalierly include nitrous oxide (N2O) as an unimportant part of Greenhouse gas emissions which include water vapor, CO2 , methane , nitrous oxide (N2O), Ozone and several chlorofluorocarbons.

Nowhere in the whole text of the DEIS do you address the ramifications of nitrous oxide emissions from the CO GEN Plant which will definitely be an integral part of the WMPI PTY, LLC proposed FISCHER TROPSCH (F-T) system.

"N2O has a [Global Warming Potential] 296 times that of CO2. Because of its long lifetime (about 120 years) it can reach the upper atmosphere, depleting the concentration of stratospheric ozone, an important filter of UV radiation. The WMPI Power Plant generates from two circulating fluidized bed boilers.CFB boilers - due to temperature issues - convert a lot of the nitrogen emissions to N2O, rather than NOx. N2O is a potent greenhouse gas and when you convert the potency to CO2-equivalents, it shows that CFB burners release 15% more greenhouse gas emissions than normal coal burners (conventional or IGCC). This is documented in a May 2003 report by the National Coal Council titled "Coal-Related Greenhouse Gas Management Issues." Akin to Mercury emissions ,Nitrous oxide also targets the brain , with the end stage resulting in severe brain damage and death.

SUP20-1

Section 4.2 POLLUTION PREVENTION AND MITIGATION MEASURES

Geological sequestration is a controversial and a largely untested idea , so since this technology presently will not be a viable or safe option during the demonstration period, please don't rely on this area to put into practice your experiments.

SUP20-2

We the people of Schuylkill County resent the fact that we, our children & our grandchildren will be used as guinea pigs for the benefit of outside corporations with hostile ambitions promoting economic growth by hyping bogus, pie in the sky independent energy ventures, which only allows the rich to further enrich just a few people in an industry that profits at the expense of public health, if indeed it profits anyone at all.

SUP20-3

It is a world renowned fact that any enterprise associated with the generation of fuels and dirty energy will inflict damage, illness and death on the community, its inhabitants and its natural environment no matter how safe Government lobbyists using influence tactics proclaim it to be.

Using Schuylkill county as a site for sequestration of CO2 into the rock strata is outlandish and out of the question. This area hosts over 37 fresh water surface reservoirs (supplying the needs of over 175,000 Schuylkill County residents) fed by springs pumped from underground aquifers. Extracting coal bed methane by pumping water from the coal beds which desorbs the methane and replacing this displaced water with CO2 would negatively impact drinking water aquifers by contamination.

SUP20-4

CO2 is buoyant underground, easily causing leakage problems WHICH CAN MIGRATE through the cracks and faults in the earth, pooling in unexpected places. Sequestration of CO2 can trigger earthquakes-SOURCE: U.S. GEOLOGICAL SURVEY Since CO2 is an asphyxiant it can knock a person out in a breath or two, again end stage would be death by suffocation.

SUP20-5

SOURCE "Any time you inject" Bill Evans... At Mammoth: Kevin Coughlin, "Death of skier Points to Invisible Danger," Newark Star Ledger. Lake Nyos Cameroon, 1700 villagers asphyxiated.

Released methane coupled with radon could leak into home basements & when you get around to lighting a cigar or the wood burner, the spark can set off a methane explosion.

SUP20-6

Mahanoy Valley, Schuylkill County is honeycombed with hundreds of old mines giving credence to the scenario described above. Tampering with all these life giving forces violates the universal laws of God and nature. This is an industry that would put our grandchildren and the elderly on the endangered species list via a lethal environmental illness.

Another scenario which comes to mind brings extensive rail transportation of captured CO2 and/or DIESEL FUEL into the site of destination would require a need for a state of the art rail system

Off the top of my head I have knowledge of only two rail systems to handle the heavily trafficked DIESEL FUEL and whatever else etc. hauling routes.

Of the two (Traditional Rails or Ribbon Rails), which would be more feasible, safer?

SUP20-7

Ribbon Rails can handle far more weight than Traditional Rails. Ribbon Rails are welded together into a single seamless line of steel.

Ribbon Rails snap in the winter like a cheap plastic toy from the cold, they turn wiggly in the summer when heat causes the steel to expand, above flaws are reasons for numerous derailments and explosions from ethanol transportation trains.

Traditional rails are bolted together to give steel room to expand and contract but are not economically practicable. The need for a state of the art rail system is imminent, cost \$3,000,000 per mile.

Will evacuation and emergency response plans be in place and workable in all municipalities and boroughs throughout the County and State before any rail shipments of DIESEL FUEL, CO₂, NAPHTHA, or possible CO₂ polishing CATALYSTS for purifying carbon dioxide before sequestration and any other unknown toxic chemicals are ready to roll.

Does the short line rail system (READING & BLUE MTN.) have sufficient liability insurance to cover a catastrophic event possibility on the 150 mile trek?

Will there be the necessary emergency responders and volunteer fire cos. throughout the County and State be up and ready to respond with state of the art equipment, training and evacuation shelters in light of a possible rail event ?

SUP20-8

There's nothing romantic about building chemical plants smack in the middle of residential communities. Wouldn't you agree that safety of human lives should trump Wall Street economics. In a radius of 15 miles surrounding this proposed plant we have a residential population of over 100,000 people.

SUP20-9

6-1 AIR QUALITY

Global warming is known to cause sudden heat waves- CO₂ and other toxic emissions thicken the ozone inversion layer, case example: 35,000 deaths contributed to heat wave in EUROPE 2005.

A dangerous inversion layer now exists in the Schuylkill county area ranging from Ravine to McAdoo Pa. Most noticeable during hot summer months, summer of 2006 heat wave bordered on near suffocation.

Is our state and federal government willing to victimize and sacrifice the safety and well being of its citizens for financial opportunity - the environmental and socio-economic aftermath of liquid fuel production and refining will leave a negative impact that will atomize health & property values in Schuylkill and nearby counties, stigmatizing this area nationwide as an energy zone that will initiate low level ozone formation.

SUP20-10

Schuylkill County will become a toxic mercury, ozone hot spot, property values will plunge, no one will want or desire to live here. The entire area will become off limits, those who remain will be forced into resettlement but not be able to relocate because they won't be able to sell their homes for a respectable price and be able to afford to buy elsewhere at comparative prices so they could enjoy the same comforts they had before all this nonsense began.

I believe the United States of America is the greatest nation on Earth. People who are in this country have an incredible amount of opportunities and blessings. But some people have taken unfair advantage of America's quaint villages, natural resources and tolerance, to promote economic growth with hostile ambitions which allows the rich to further enrich just a few people in an industry that profits at the expense of public health .

I am for energy independence via energy conservation, cutting edge fuel efficient technology for motor vehicles, wind, solar energy and methane digesters, the answer to regulating sewer sludge. I am for progress offering more jobs and a healthier safer environment than their antiquated unsustainable smoke stack technology counterparts. I am for protecting our National Security and more so the security of my birth right county.

The technology exists to build cars, minivans, and SUVs that are just as powerful and safe as vehicles on the road today, but get 40 miles per gallon (mpg) or more. Better transmissions and engines, more aerodynamic designs, and stronger yet lighter material for chassis and bodies can cost-effectively increase the average fuel economy of today's automotive fleet from 24 mpg to 40 mpg over 10 years. This would be equivalent to taking 44 million cars off the road-and it would save individual drivers thousands of dollars in fuel costs over the life of a vehicle.

SUP20-11

SOURCE: UNION OF CONCERNED SCIENTISTS.
Citizens and scientists for environmental solutions

All said and done I rest my case.

Joseph M. Arcuri
Frackville Pa.
National Resources Defense Council
N.R.D.C. Member, Pennsylvania Chapter

SUP20 2/27/07
Joseph M. Arcuri
Frackville, PA

Comment SUP20-1

“In this section they cavalierly include nitrous oxide (N₂O) as an unimportant part of Greenhouse gas emissions which include water vapor, CO₂, methane, nitrous oxide (N₂O), Ozone and several chlorofluorocarbons.

Nowhere in the whole text of the DEIS do you address the ramifications of nitrous oxide emissions from the CO GEN Plant which will definitely be an integral part of the WMPI PTY, LLC proposed FISCHER TROPSCH (F-T) system.

" N₂O has a [Global Warming Potential] 296 times that of CO₂. Because of its long lifetime (about 120 years) it can reach the upper atmosphere, depleting the concentration of stratospheric ozone, an important filter of UV radiation. The WMPI Power Plant generates from two circulating fluidized bed boilers. CFB boilers - due to temperature issues - convert a lot of the nitrogen emissions to N₂O, rather than NO_x. N₂O is a potent greenhouse gas and when you convert the potency to CO₂-equivalents, it shows that CFB burners release 15% more greenhouse gas emissions than normal coal burners (conventional or IGCC). This is documented in a May 2003 report by the National Coal Council titled "Coal-Related Greenhouse Gas Management Issues." Akin to Mercury emissions, Nitrous oxide also targets the brain, with the end stage resulting in severe brain damage and death.”

Response:

The commenter is correct that the DEIS did not specifically discuss the potential emission of nitrous oxide (N₂O) from the proposed facilities.

As discussed in the report cited by the commenter (National Coal Council 2003), increases in N₂O emissions contribute to depletion of stratospheric ozone, which is an important filter of ultraviolet radiation. Also, N₂O is considered to be a more potent greenhouse gas than CO₂. N₂O emissions are generated by fluidized bed combustion of coal, the technology currently used at the existing Gilberton power plant. However, because N₂O toxicity is known to occur only at much higher concentrations than would be found in ambient air, it is not considered to be a human health concern.

The National Coal Council (2003) estimated that N₂O emissions generated from coal combustion account for approximately 2% of the known global sources of N₂O emissions. Further, the release of N₂O emissions from fluidized bed combustion (such as that currently being used at the existing Gilberton power plant) is the result of combustion within a particular temperature range. On the other hand, gasification systems, such as the IGCC system that would be used at the proposed facilities, operate under different conditions, and as a result, produce much less N₂O emissions.

Marano and Ciferno (2001) estimated the greenhouse-gas emissions from Fischer-Tropsch production, using coal from several different U.S. sources to produce several different types of liquid fuel. Marano and Ciferno (2001) assumed the global warming potential of N₂O to be 310 times that of CO₂ (this is the estimated potency for a time horizon of 100 years). Their estimates indicate that the N₂O emissions released by a facility such as the proposed project would add only 0.1% to 0.2% to the greenhouse gas impact from that facility's CO₂ releases.

Also, Marano and Ciferno (2001) calculated methane emissions from the Fischer-Tropsch process. For a 100-year time horizon, methane is estimated to be about 21 times more potent as a greenhouse gas than CO₂. Assuming this potency value, methane emissions were estimated to be 0.2% to 0.3% of the greenhouse gas contribution from CO₂ releases from a facility employing Fischer-Tropsch technology like the proposed project.

Applying these percentages of N₂O and methane emissions to the estimated CO₂ emissions of the proposed facilities (2,282,000 tons per year of CO₂), combined N₂O and methane emissions could add up to about 10,000 tons per year of CO₂-equivalents. (For information on the emission of water vapor, see the response to comment SUP23-4.)

It should be noted that other than sharing some infrastructure and beneficiation facilities, the existing Gilberton Power Plant would not be an integral part of the action as proposed to DOE. The two power plants would operate independently. However, emissions from the Gilberton Power Plant are included in the current global greenhouse gas inventory to which the proposed action would contribute. The cumulative impacts on local air quality from the proposed project, the existing Gilberton power plant, and five other existing power plants within approximately 20 miles of the proposed facilities have been modeled and are discussed in Section 6.1.

Reference: National Coal Council. 2003. Coal-Related Greenhouse Gas Management Issues. May.

Comment SUP20-2

“Geological sequestration is a controversial and a largely untested idea, so since this technology presently will not be a viable or safe option during the demonstration period, please don't rely on this area to put into practice your experiments.”

Response:

While the possibility of geologic sequestration of CO₂ generated by the proposed project is discussed in Section 5.1.4, Commercial Operation, it has not been proposed by the industrial participant, and is, therefore, not part of the proposed project.

Comment SUP20-3

“We the people of Schuylkill County resent the fact that we, our children & our grandchildren will be used as guinea pigs for the benefit of outside corporations with hostile ambitions promoting economic growth by hyping bogus, pie in the sky independent energy ventures, which only allows the rich to further enrich just a few people in an industry that profits at the expense of public health, if indeed it profits anyone at all.

It is a world renowned fact that any enterprise associated with the generation of fuels and dirty energy will inflict damage, illness and death on the community, its inhabitants and its natural environment no matter how safe Government lobbyists using influence tactics proclaim it to be.”

Response:

The comment has been noted.

Comment SUP20-4

“Using Schuylkill county as a site for sequestration of CO₂ into the rock strata is outlandish and out of the question. This area hosts over 37 fresh water surface reservoirs (supplying the needs of over 175,000 Schuylkill County residents) fed by springs pumped from underground aquifers. Extracting coal bed methane by pumping water from the coal beds which desorbs the methane and replacing this displaced water with CO₂ would negatively impact drinking water aquifers by contamination.”

Response:

As discussed in Section 5.1.4, contamination of water supplies is recognized as one of the potential environmental impacts that might result from geologic sequestration of CO₂. However, the

surface reservoirs that supply water to most Schuylkill County residents are in upland areas that are both uphill and hydrologically upgradient from the locations where CO₂ might be injected or where water pumped from coal beds would be discharged. Furthermore, an Environmental Protection Agency study concluded that injection of fluids during coal bed methane production has little or no potential to cause contamination of drinking-water aquifers (EPA 2004). Thus, the potential for impacts to water supply reservoirs would be very low. In addition, note that sequestration of CO₂ is not part of the proposed project.

Reference: EPA 2004. Evaluation of Impacts to Underground Sources of Drinking Water by Hydraulic Fracturing of Coalbed Methane Reservoirs. EPA-816-R-04-003. Office of Groundwater and Drinking Water, Washington, DC. June.

Comment SUP20-5

“CO₂ is buoyant underground, easily causing leakage problems WHICH CAN MIGRATE through the cracks and faults in the earth, pooling in unexpected places.

Sequestration of CO₂ can trigger earthquakes-SOURCE: U.S. GEOLOGICAL SURVEY

Since CO₂ is an asphyxiant it can knock a person out in a breath or two, again end stage would be death by suffocation.

SOURCE "Any time you inject" Bill Evans... At Mammoth: Kevin Coughlin, "Death of skier Points to Invisible Danger," Newark Star Ledger.

Lake Nyos Cameroon, 1700 villagers asphyxiated.”

Response:

Geologic sequestration of CO₂ is not a part of the proposed project. However, DOE is actively engaged in research and development on geologic carbon sequestration through its separate Carbon Sequestration Program, with the aim of resolving engineering and environmental issues associated with these technologies, such as concerns about potential for leakage and the potential to trigger seismic activity. Note, however, that (as discussed in Section 5.1.4), extensive industrial experience with the safe underground storage of natural gas supports confidence in the safety of engineered underground storage of CO₂.

SUP20-6

“Released methane coupled with radon could leak into home basements & when you get around to lighting a cigar or the wood burner, the spark can set off a methane explosion.

Mahanoy Valley, Schuylkill County is honeycombed with hundreds of old mines giving credence to the scenario described above. Tampering with all these life giving forces violates the universal laws of God and nature. This is an industry that would put our grandchildren and the elderly on the endangered species list via a lethal environmental illness.”

Response:

Coal beds with complex geologic structure or where underground coal mining has occurred in the past are not suitable for geologic sequestration of CO₂. As discussed in Section 5.1.4, the potential sites for sequestration in Schuylkill County are in deep coal beds that have never been mined. If recovery of methane from coal beds were done in connection with CO₂ sequestration, it is expected that the capture of methane would be highly effective because it would be done using the same conventional gas-production technology that has been used routinely for decades by the natural gas industry. Because of the efficiency of this technology, leakage should be minimized. Note that coal bed methane production was first initiated as a safety measure because it can reduce the explosion hazard in underground coal mines (EPA 2004). In addition, it should be noted that sequestration of CO₂ is not part of the proposed project.

SUP20-7

“Another scenario which comes to mind brings extensive rail transportation of captured CO₂ and/or DIESEL FUEL into the site of destination would require a need for a state of the art rail system

Off the top of my head I have knowledge of only two rail systems to handle the heavily trafficked DIESEL FUEL and whatever else etc. hauling routes.

Of the two (Traditional Rails or Ribbon Rails), which would be more feasible, safer?

Ribbon Rails can handle far more weight than Traditional Rails. Ribbon Rails are welded together into a single seamless line of steel.

Ribbon Rails snap in the winter like a cheap plastic toy from the cold, they turn wiggly in the summer when heat causes the steel to expand, above flaws are reasons for numerous derailments and explosions from ethanol transportation trains.

Traditional rails are bolted together to give steel room to expand and contract but are not economically practicable. The need for a state of the art rail system is imminent, cost \$3,000,000 per mile.”

Response:

The proposed action does not involve the transport of CO₂, but it does include the transport of diesel fuel product by rail. There are no plans for construction of new rail lines in support of the proposed project. Jointed rail (traditional rail) is used on lightly traveled rail lines where high speeds and heavy traffic are not needed. Continuous welded rail (ribbon rail) is used on mainlines that experience heavy traffic and/or high speeds. Jointed rail is less expensive, but requires more maintenance than continuous rail. Continuous welded rail is used on heavily traveled lines because of its lower maintenance costs. As the commenter notes, continuous welded rail is most subject to failure at very high or very low ambient temperatures. Regardless of whether jointed rail or continuous welded rail is used, rail line safety is assured by regular inspection and by operating trains at speeds that are consistent with the quality of the track.

SUP20-8

“Will evacuation and emergency response plans be in place and workable in all municipalities and boroughs throughout the County and State before any rail shipments of DIESEL FUEL, CO₂, NAPTHA, or possible CO₂ polishing CATALYSTS for purifying carbon dioxide before sequestration and any other unknown toxic chemicals are ready to roll.

Does the short line rail system (READING & BLUE MTN.) have sufficient liability insurance to cover a catastrophic event possibility on the 150 mile trek?

Will there be the necessary emergency responders and volunteer fire cos. throughout the County and State be up and ready to respond with state of the art equipment, training and evacuation shelters in light of a possible rail event?”

Response:

Evacuation and emergency response plans are described in revised Section 4.1.9.1. The Schuylkill County Emergency Management Agency (SCEMA) is responsible for emergency response planning in Schuylkill County. SCEMA, in conjunction with the Pennsylvania Emergency Management Agency (PEMA), is in the process of developing a hazardous mitigation plan for Schuylkill County. The plan will cover the hazards which are most likely to affect the county and pose a threat to its inhabitants, including hazardous materials, transportation, and wildfires (for additional information, see SCEMA's web site at <http://www.scema.org/ps/hazplan.htm>). Similarly,

the other counties and municipalities, along the rail line would be responsible for working with PEMA to ensure that emergency response and evacuation plans are in place.

The Pennsylvania Public Utility Commission's (PUC) Rail Safety Division is responsible for compliance with PUC Railroad Regulations and Federal Railroad Administration Regulations as they relate to track, motive power and equipment, hazardous material, and operating practices (http://www.puc.state.pa.us/transport/railsafe/railsafe_index.aspx). Specifically, the Rail Safety Division enforces regulations concerning track safety standards, freight car safety standards, and operating rules promulgated by the Federal Railroad Administration (49 CFR Parts 213, 215, and 217) pursuant to an agreement under the provision of the Federal Railroad Safety Act of 1970 (45 U.S.C. §§421). Therefore, the Rail Safety Division would be responsible for working with the rail operator to ensure the safety of increased rail usage associated with the proposed project and to ensure that the rail operator met state and federal requirements for liability insurance.

SUP20-9

“There's nothing romantic about building chemical plants smack in the middle of residential communities. Wouldn't you agree that safety of human lives should trump Wall Street economics. In a radius of 15 miles surrounding this proposed plant we have a residential population of over 100,000 people.”

Response:

The potential effects of construction and operation of the proposed facilities on human health and safety are discussed in Section 4.1.9 and 4.1.10. These analyses include a consideration of public health effects of air emissions, hazardous chemicals, on-site and off-site accidents, worker safety, electromagnetic fields, noise, and intentional destructive acts. The impacts are considered to be small or controllable by implementation of Risk Management Plans, Emergency Response Programs, and Occupational Safety and Health Programs.

SUP20-10

“6-1 AIR QUALITY

Global warming is known to cause sudden heat waves- CO₂ and other toxic emissions thicken the ozone inversion layer, case example: 35,000 deaths contributed to heat wave in EUROPE 2005. A dangerous inversion layer now exists in the Schuylkill county area ranging from Ravine to McAdoo Pa. Most noticeable during hot summer months, summer of 2006 heat wave bordered on near suffocation.

Is our state and federal government willing to victimize and sacrifice the safety and well being of its citizens for financial opportunity - the environmental and socio-economic aftermath of liquid fuel production and refining will leave a negative impact that will atomize health & property values in Schuylkill and nearby counties, stigmatizing this area nationwide as an energy zone that will initiate low level ozone formation.

Schuylkill County will become a toxic mercury, ozone hot spot, property values will plunge, no one will want or desire to live here. The entire area will become off limits, those who remain will be forced into resettlement but not be able to relocate because they won't be able to sell their homes for a respectable price and be able to afford to buy elsewhere at comparative prices so they could enjoy the same comforts they had before all this nonsense began.”

Response:

Statistically, global warming is suspected of enhancing the frequency and intensity of heat waves, but the amount that CO₂ and other emissions would contribute to a given heat wave is not

certain. Greenhouse emissions act gradually to add concentrations to the atmosphere globally and operate over very long time periods.

Inversion layers are associated with another phenomenon. Normally, the temperature is warmer at the earth's surface and decreases to the top of the troposphere (at an altitude of about 35,000 ft). However, during late night and early morning hours, certain geographical areas such as Schuylkill County may be more prone to the development of inversion layers (so called because the temperature increases with height rather than the customary decrease with height). Meteorological conditions associated with inversions often include very weak larger-scale winds and stable temperature structure in which the lowest 100 ft to 3,000 ft of the atmosphere above the earth's surface decouples from the atmosphere above it and results in limited vertical mixing of the atmosphere and increased concentrations of pollutants from air emissions. Topographic conditions that contribute to increased concentrations of pollutants include a ridge-and-valley structures that tend to trap pollutants horizontally.

Ozone, however, is formed as a secondary pollutant from photochemical reactions involving air emissions of volatile organic compounds and oxides of nitrogen during periods of strong sunlight, which occurs during non-inversion conditions. During the late night and early morning hours when inversion layers form, most of the ozone is dissipated due to the absence of sunlight, which causes the photochemical reactions to reverse, leaving only a small elevated ozone layer.

The potential air quality impacts of the proposed project are discussed in Sections 4.1.2.2 and 6.1. These sections present data to demonstrate that air emissions from the proposed project, both individually and in combination with six other nearby power plants, are not expected to degrade local air quality. The air dispersion modeling conducted for the potential air quality impacts of pollutants such as SO₂, NO_x, and PM used 42 meteorological conditions, including very conservative conditions (forming an upper-bound) such as inversion conditions.

SUP20-11

"I believe the United States of America is the greatest nation on Earth. People who are in this country have an incredible amount of opportunities and blessings. But some people have taken unfair advantage of America's quaint villages, natural resources and tolerance, to promote economic growth with hostile ambitions which allows the rich to further enrich just a few people in an industry that profits at the expense of public health.

I am for energy independence via energy conservation, cutting edge fuel efficient technology for motor vehicles, wind, solar energy and methane digesters, the answer to regulating sewer sludge. I am for progress offering more jobs and a healthier safer environment than their antiquated unsustainable smoke stack technology counterparts. I am for protecting our National Security and more so the security of my birth right county.

The technology exists to build cars, minivans, and SUVs that are just as powerful and safe as vehicles on the road today, but get 40 miles per gallon (mpg) or more. Better transmissions and engines, more aerodynamic designs, and stronger yet lighter material for chassis and bodies can cost-effectively increase the average fuel economy of today's automotive fleet from 24 mpg to 40 mpg over 10 years. This would be equivalent to taking 44 million cars off the road-and it would save individual drivers thousands of dollars in fuel costs over the life of a vehicle."

Response:

The comments have been noted.

Comments on Draft Environmental Impact Statement (DOE/EIS-0357D-S1)

for Gilberton, Pennsylvania Coal-to-Liquids Project

API appreciates the opportunity to comment on the Department of Energy's (DOE) draft Environmental Impact Statement (DEIS) for the proposed Coal-to-Liquids (CTL) Project in Gilberton, Pennsylvania. API is a nationwide, not-for-profit trade association representing nearly 400 member companies engaged in all aspects of the oil and gas industry, including exploration and production, transportation, refining, distribution and marketing. API's member companies are interested in - and in some cases actively pursuing or participating in - carbon capture and storage projects. Given that the final EIS could set precedents for reviews of future projects, API and its members have a strong interest in the DEIS. We offer the following comments on the CO₂ geo-sequestration (CGS) statements contained in the Draft Environmental Impact Statement (DEIS)

1. DOE rejected CGS as a CO₂ emissions mitigation measure stating that CGS "is not a reasonable option because sequestration technology is not sufficiently mature to be implemented at production scale during the demonstration period for the proposed facilities" (page 4). However, in support of this conclusion, DOE cites its own white paper "CO₂ capture and storage in geologic formations" done in January of 2002 even though the paper only outlines DOE's own research program. } SUP21-1

2. The statement in DEIS Section 4.2 that CGS "is not a reasonable option.....not sufficiently mature.....at a production scale" appears to be focused on the storage or sequestration technology (as opposed to the CO₂ capture technology) and does not recognize that: } SUP21-2
 - a. There are currently ongoing industrial-scale, commercial storage projects, namely the offshore Sleipner natural gas processing project in Norway which has been injecting 1 million tonnes per year since 1996, the In Salah natural gas project in Algeria, which has been injecting about 1.2 million tonnes per year since 2004, and Snohvit LNG project which will soon start operation.
 - b. The IPCC Special Report on Carbon Capture and Storage classifies all of the CCS technologies needed in the Gilberton CTL project as at least "Economically feasible under specific conditions" (page 18, Table TS.1), meaning that "the technology is well understood".

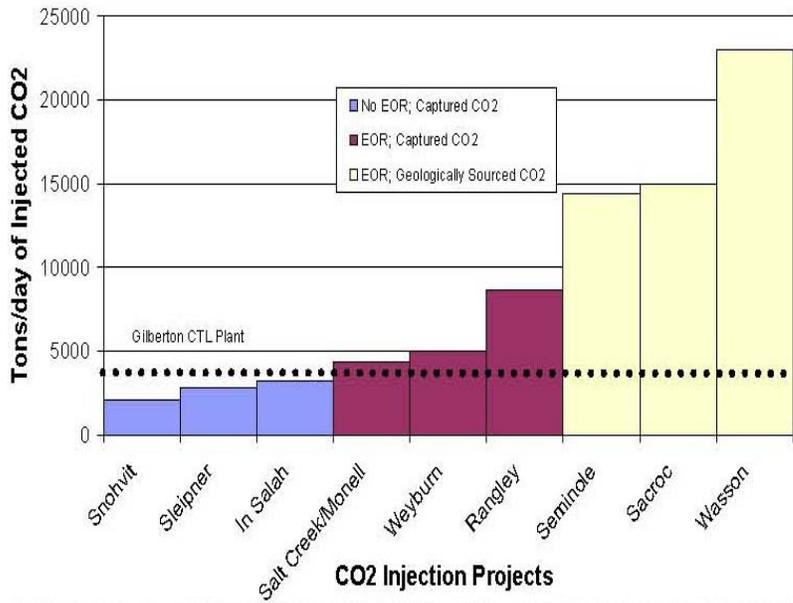
CCS component	CCS technology	Research phase ^a	Demonstration phase ^b	Economically feasible under specific conditions ^c	Mature market ^d
Capture	Post-combustion			X	
	Pre-combustion			X	
	Oxyfuel combustion		X		
	Industrial separation (natural gas processing, ammonia production)				X
Transportation	Pipeline				X
	Shipping			X	
Geological storage	Enhanced Oil Recovery (EOR)				X ^e
	Gas or oil fields			X	
	Saline formations			X	
	Enhanced Coal Bed Methane recovery (ECBM) ^f		X		

^e Economically feasible under specific conditions means that the technology is well understood and used in selected commercial applications, for instance if there is a favourable tax regime or a niche market, or processing on in the order of 0.1 MtCO₂ yr⁻¹, with few (less than 5) replications of the technology.

- c. Thousands of CO₂ injection wells are safely and economically operating in over 70 CO₂ EOR projects in the USA and more in other countries. Thirty million tons per year of new CO₂ plus additional quantities of recycled CO₂ is injected in EOR project wells in the USA. Some CO₂ EOR projects inject at rates higher than or near the 3,973 tons per day needed for the Gilberton CTL project. See Figure below for some examples.

SUP21-2

Industry has experience injecting CO₂ in quantities comparable to the Gilberton CTL Plant.



Data Source: Heinrich, et al., "Environmental Assessment of Geologic Storage of CO₂" presented at the Second National Conference on Carbon Sequestration, Washington, DC, May 5-8 (2003)

d. CO₂ co-produced with H₂S during oil and gas production has been routinely injected in disposal wells. CO₂ is often separated from oil and gas well production along with other naturally occurring gases such as H₂S and pipelined to nearby injection well sites for permanent geo-sequestration. Bachu reported that 40 acid gas injection facilities were safely operating in Canada in 2002 and had geo-sequestered 1.5 Mt of CO₂ and 1.0 Mt of H₂S. Xu et al reported in 2004 that CO₂ was being geo-sequestered at 16 acid gas injection facilities in the USA. Experience with acid gas injection isn't mentioned in the DEIS.

SUP21-3

e. The long history of gas injection well operations in the USA should be noted by the DOE in evaluating the prospects for successful CGS operations during the estimated 50 year operating life of the proposed Gilberton GTL project. This part of the petroleum industry in the USA utilizes the same types of well construction and surface facility technology and injection operations procedures as those required for CGS. For example, Sleipner injects CO₂ through a standard gas injection well. The site selection/monitoring process and injection/reservoir engineering for natural gas storage projects are also similar. Natural gas injection volumes in the USA are over 3 TCF per year compared to the proposed Gilberton CGS volume of 25 BCF per year or 120 times the so-called "production scale" mentioned in the DEIS. Natural gas storage facilities are widely spread across the USA at 394 separate field locations including 7 operating in Pennsylvania. Plans for 14 new ones have been made and should be starting up soon in the USA including 2 more starting in Pennsylvania. Aquifers are used for gas storage in 44 of the 394 fields. The history of natural gas injection in the USA is summarized in the Table below:

SUP21-4

U.S. Total Natural Gas Injections into Underground Storage (MMcf)

Decade	Year-0	Year-1	Year-2	Year-3	Year-4	Year-5	Year-6	Year-7	Year-8	Year-9
1930's						11,294	10,998	13,706	14,981	8,032
1940's	14,995	16,251	21,024	18,953	43,502	61,502	75,458	96,316	136,406	172,051
1950's	229,752	347,690	398,593	404,838	432,283	505,185	589,232	672,377	704,172	787,485
1960's	844,352	843,666	940,823	1,047,492	1,014,814	1,077,980	1,210,469	1,317,363	1,425,075	1,496,407
1970's	1,856,767	1,839,398	1,892,952	1,974,324	1,784,209	2,103,619	1,918,541	2,303,268	2,270,961	2,285,016
1980's	1,896,284	2,179,683	2,399,355	1,700,426	2,252,347	2,127,932	1,952,103	1,887,110	2,174,328	2,491,283
1990's	2,433,450	2,608,373	2,555,393	2,759,738	2,796,279	2,565,882	2,905,592	2,800,294	2,904,755	2,597,509
2000's	2,684,285	3,464,262	2,669,844	3,291,714	3,150,003	3,001,582				

Updated on 1/30/2007

Source: U.S. Energy Information Administration

3. The DEIS explores the feasibility of sequestration at a "regional sequestration site" and does not find or cite any concrete reason why it could not be done (page 4-5). It cites reasons the Schuylkill site would not work, but is silent on why the "regional sequestration site" would not work. In fact, the DEIS states the "region's sequestration capacity would be more than sufficient for the 72,000,000 tons of CO₂

SUP21-5

that would be recovered during the facilities' 50-year operating life." The project proponent should take the necessary steps to conduct an assessment of the nearby geology and also take into account nearby population centers with appropriate mitigation of risks.

} SUP21-5

4. Additionally, on page ii, DOE mentions that initially it was anticipated that the CO₂ would be sold, but that the project sponsor has informed DOE that the sale would not occur. This is a market issue, not a technical issue and not a relevant to the conclusion that the "technology is not sufficiently mature." Furthermore, the commercial aspects may be revised based on the results of an invitation to bid for the construction and operation of CGS facilities, pipelines and injection wells.

} SUP21-6

Current CTL and associated CCS projects that are in the feasibility evaluation or planning stage in other areas of the USA may be affected by this DEIS. Because of this, a more considered evaluation of the technology needs to be undertaken. If API can be of further assistance, please contact Steve Crookshank (202.682.8542; crookshanks@api.org) or Russell Jones (202.682.8545; jonesr@api.org) of API's Global Climate Team.

} SUP21-7

SUP21 2/27/07

Steven L Crookshank
American Petroleum Institute

SUP 21-1

DOE rejected CO₂ geo-sequestration (CGS) as a CO₂ emissions mitigation measure stating that CGS “is not a reasonable option because sequestration technology is not sufficiently mature to be implemented at production scale during the demonstration period for the proposed facilities” (page 4). However, in support of this conclusion, DOE cites its own white paper “CO₂ capture and storage in geologic formations” done in January of 2002 even though the paper only outlines DOE’s own research program.

Response:

The supplement to the draft EIS did not cite a reference in support of the statement quoted by the commenter. The quoted statement was a DOE statement based on consideration of information and analysis published by or obtained from sources both within and outside DOE. The statement is specific to the proposed project and should not be interpreted as applying to geologic sequestration technology in general.

The DOE white paper is cited in Section 5.1.4 in support of the statement that large-scale commercial deployment of the most promising carbon sequestration technologies is expected to be technically practicable within the next 15 years, which is well within the estimated 50-year commercial operating life of the proposed facilities.

SUP21-2

The statement in DEIS Section 4.2 that CGS “is not a reasonable option.....not sufficiently mature.....at a production scale” appears to be focused on the storage or sequestration technology (as opposed to the CO₂ capture technology) and does not recognize that:

- a. There are currently ongoing industrial-scale, commercial storage projects, namely the offshore Sleipner natural gas processing project in Norway which has been injecting 1 million tonnes per year since 1996, the In Salah natural gas project in Algeria, which has been injecting about 1.2 million tonnes per year since 2004, and Snohvit LNG project which will soon start operation.
- b. The IPCC Special Report on Carbon Capture and Storage classifies all of the CCS technologies needed in the Gilberton CTL project as at least “Economically feasible under specific conditions” (page 18, Table TS.1), meaning that “the technology is well understood”.
- c. Thousands of CO₂ injection wells are safely and economically operating in over 70 CO₂ EOR projects in the USA and more in other countries. Thirty million tons per year of new CO₂ plus additional quantities of recycled CO₂ is injected in EOR project wells in the USA. Some CO₂ EOR projects inject at rates higher than or near the 3,973 tons per day needed for the Gilberton CTL project. See Figure below for some examples.

Response:

The comment correctly interprets the meaning of the quoted statement in Section 4.2. The statement is focused on the storage or sequestration technology. While the proposed facilities would produce a segregated CO₂ stream, thus accomplishing the “capture” step, sequestration of this CO₂ stream is not included as part of the proposed project, and therefore, is not a reasonable alternative for DOE to consider.

DOE is aware of the ongoing and planned enhanced-oil-recovery projects described in the comment, all of which take advantage of physical conditions and economic situations favorable for this type of activity. The IPCC Special Report on Carbon Capture and Storage (IPCC 2005) did characterize geologic storage in saline formations or oil and gas fields as “economically feasible under specific conditions,” such as the presence of favorable tax regimes or other incentives.

SUP 21-3

CO₂ co-produced with H₂S during oil and gas production has been routinely injected in disposal wells. CO₂ is often separated from oil and gas well production along with other naturally occurring gases such as H₂S and pipelined to nearby injection well sites for permanent geo-sequestration. Bachu reported that 40 acid gas injection CO₂ and 1.0 Mt of H₂S. Xu et al reported in 2004 that CO₂ was being geo-sequestered at 16 acid gas injection facilities in the USA. Experience with acid gas injection isn’t mentioned in the DEIS.

Response:

Acid gas injection, as described in this comment, is not directly relevant to the technologies that would be employed at the proposed facilities discussed in this final EIS. Sulfur would be separated from the gas stream in the Claus unit at the proposed facilities and then sold as a solid byproduct. Therefore, there would be no production of a CO₂ and H₂S gas mixture. There is no reason to consider the potential injection of such a mixture.

SUP21-4

The long history of gas injection well operations in the USA should be noted by the DOE in evaluating the prospects for successful CGS operations during the estimated 50 year operating life of the proposed Gilberton GTL project. This part of the petroleum industry in the USA utilizes the same types of well construction and surface facility technology and injection operations procedures as those required for CGS. For example, Sleipner injects CO₂ through a standard gas injection well. The site selection/monitoring process and injection/reservoir engineering for natural gas storage projects are also similar. Natural gas injection volumes in the USA are over 3 TCF per year compared to the proposed Gilberton CGS volume of 25 BCF per year or 120 times the so-called “production scale” mentioned in the DEIS. Natural gas storage facilities are widely spread across the USA at 394 separate field locations including 7 operating in Pennsylvania. Plans for 14 new ones have been made and should be starting up soon in the USA including 2 more starting in Pennsylvania. Aquifers are used for gas storage in 44 of the 394 fields. The history of natural gas injection in the USA is summarized in the Table below (see letter).

Response:

Revised Section 5.1.4 notes that there is considerable industry experience with gas injection wells for purposes such as enhanced oil recovery, underground storage of natural gas, and production of coal-bed methane for sale as natural gas.

SUP21-5

The DEIS explores the feasibility of sequestration at a “regional sequestration site” and does not find or cite any concrete reason why it could not be done (page 4-5). It cites reasons the Schuylkill site would not work, but is silent on why the “regional sequestration site” would not work. In fact, the DEIS states the “region’s sequestration capacity would be more than sufficient for the 72,000,000 tons of CO₂ that would be recovered during the facilities’ 50-year operating life.” The

project proponent should take the necessary steps to conduct an assessment of the nearby geology and also take into account nearby population centers with appropriate mitigation of risks.

Response:

Geologic carbon sequestration was not part of the project as proposed to DOE. There is no basis for DOE to direct the industrial participant to pursue its potential implementation during the demonstration period. Section 5.1.4 discusses the potential for geologic carbon sequestration during later commercial operations, as well as its potential environmental impacts. As discussed in that section, sequestration capacity for some of the facilities' CO₂ production may exist in Schuylkill County. The combined capacity of various different sequestration targets in Western Pennsylvania appears to be more than sufficient for the separated CO₂ that could be generated throughout the facilities' operating life. As implied by the comment, several preliminary steps would need to be completed before a geologic sequestration program could be initiated in either location, including acquisition of necessary surface and subsurface rights, geologic investigations, engineering of an injection system, and resolution of environmental concerns.

SUP21-6

Additionally, on page ii, DOE mentions that initially it was anticipated that the CO₂ would be sold, but that the project sponsor has informed DOE that the sale would not occur. This is a market issue, not a technical issue and not a relevant to the conclusion that the "technology is not sufficiently mature." Furthermore, the commercial aspects may be revised based on the results of an invitation to bid for the construction and operation of CGS facilities, pipelines and injection wells.

Response:

The statement cited by the commenter was not intended to imply that there were technical reasons for the industrial participant's decision not to sell the concentrated stream of CO₂.

SUP21-7

Current CTL and associated CCS projects that are in the feasibility evaluation or planning stage in other areas of the USA may be affected by this DEIS. Because of this, a more considered evaluation of the technology needs to be undertaken.

Response:

DOE acknowledges that geologic carbon sequestration may be a reasonable option for other projects and sites, even though it is not part of the project as proposed to DOE as part of the technology demonstration at the proposed facilities. DOE is actively supporting demonstrations of technologies for geologic carbon sequestration through its separate Carbon Sequestration Program and the FutureGen Initiative. As indicated by one of the tables supplied by the commenter, in the near term the feasibility of most geologic carbon sequestration technologies depends on project- and site-specific physical and economic conditions.



February 27, 2007

Ms. Janice L. Bell
National Environmental Policy Act (NEPA)
Document Manager, U.S. Department of Energy,
National Energy Technology Laboratory,
626 Cochrans Mill Road, P.O. Box 10940,
Pittsburgh, PA 15236-0940.

Dear Ms. Bell,

The Natural Resources Defense Council (NRDC) appreciates this opportunity to comment on the new supplement to the Department of Energy (DOE) draft environmental impact statement (DEIS) regarding the proposed liquid coal in Gilberton, PA. NRDC is a non-profit membership organization dedicated to protection the global environment and preserving the Earth's natural resources and represents thirty thousand members in PA and six hundred and fifty thousand members nationally. NRDC has submitted numerous sets of comments on this Draft EIS and most notably discovered that the actual CO₂ emissions from this liquid coal plant would be 3 times higher than reported. The first draft EIS misreported the CO₂ emissions at 0.8 million tons per year, while the supplemental EIS now estimates the correct CO₂ emissions at 2.3 million tons per year. It should be noted that WMPI, Inc. originally planned to sell 1.45 million tons per year CO₂ emissions from the plant to a third party and DOE accepted this as a reason not to report emissions. Selling the CO₂ is not equivalent to sequestering the CO₂ and therefore these emissions should be reported unless sequestration is specified. This misrepresentation triggered the release of this supplemental EIS for comment. Research by Williams et. al. shows that liquid coal has double the life-cycle CO₂ emissions of conventional petroleum. This supplement reinforces the notion that we should not be subsidizing the birth of an industry that is far from "clean" and that could leave us with a heavy legacy of greenhouse gases.

SUP22-1
SUP22-2

Carbon Dioxide Emission Comparison to Conventional Petroleum Refinery

The supplemental EIS argues that, with technology advancements, future large scale CTL facilities are expected to be able to achieve higher rates of CO₂ capture and sequestration than the current technology (Larson and Tingjin 2003, Southern States Energy Board 2006), potentially resulting in greenhouse-gas emissions that are lower than those resulting from use of conventional petroleum refineries that are not equipped for CO₂ capture and sequestration. Due to the additional costs associated with carbon capture and storage, it must be assumed that if a CTL facility is utilizing carbon capture and storage, it must be doing so as a result of carbon control regulations and/or their economic implications. It is therefore reasonable to assume that the same regulations might lead an oil refinery to capture and store its carbon as well. In order to present a fair and complete range of comparisons, DOE must also consider a case where CCS is employed in both the CTL plant and the oil refinery. In any case, CTL plants with carbon capture and storage still produce nearly 10% more carbon than a conventional petroleum refinery without capture and storage¹.

SUP22-3

¹ Robert H. Williams, Eric D. Larson & Haiming Jin, "Synthetic fuels in a world with high oil and carbon prices". Prepared for 8th International Conference on Greenhouse Gas Control Technologies, Trondheim, Norway, 19-22 June 2006

Status of Carbon Capture and Storage

The new supplement to the Department of Energy (DOE) draft environmental impact statement (DEIS) for the Gilberton coal-to-liquid-fuel plant mischaracterizes the current status of CCS technology. The DEIS states that "sequestration technology is not sufficiently mature to be implemented at production scale during the demonstration period for the proposed facilities". It is both feasible and technically practicable to carry out large, commercial scale capture and sequestration of CO₂ in geological formations today, as several projects have proven internationally. Economic, geographical and logistical factors specific to this particular plant should not be used to discredit CCS technology as a whole, and as such the statement is wrong. The supplemental further states that, "Large-scale commercial deployment of the most promising carbon sequestration technologies is expected to be technically practicable within the next 15 years (CO₂ Capture and Storage Working Group 2002)." This reference is to a draft program plan (white paper) by NETL in 2001 that outlined a 15-year government program to subsidize demonstration projects. This paper did not claim that sequestration on the scale of the Gilberton project could not be implemented for another 15 years, and furthermore significant developments in understanding and deployment of CCS have taken place since 2001.

SUP22-4

SUP22-5

Currently, the DOE regional carbon sequestration partnerships are involved in pilot-scale carbon capture and storage while the private sector, most notably BP, is pursuing projects that would sequester even larger quantities of CO₂ than would be involved at Gilberton. In addition, the amounts already being sequestered from Beulah and Labarge in the US are the same order of magnitude as the Gilberton emission stream. While Beulah, Labarge and Carson are, or would be, injection projects occurring in oil fields, other projects (Sleipner and InSalah) are successful examples of commercial sequestration operations in other types of reservoir. The DEIS' conclusions are clouded by the fact that there is a distinct lack of geological storage site mapping in Eastern Pennsylvania. The DEIS focuses almost exclusively on coal seams or sinks in the Western part of the state, without considering the potential for other types of sink in the vicinity of Gilberton. The fact that the local geology has not been examined sufficiently should not be used to draw generalized conclusions about the feasibility of CCS as a technology. Finally, DOE's much touted FutureGen project, scheduled to begin operation in 2012, is an unambiguous example of the government's position that we know enough now to store safely several million tons of CO₂ per year underground.

SUP22-6

SUP22-7

SUP22-8

Sincerely,

David Hawkins
Director, Climate Center
Natural Resources Defense Council

SUP22 2/27/07

David Hawkins
Director, Climate Center
Natural Resource Defense Council

SUP22-1

The Natural Resources Defense Council (NRDC) appreciates this opportunity to comment on the new supplement to the Department of Energy (DOE) draft environmental impact statement (DEIS) regarding the proposed liquid coal in Gilberton, PA. NRDC is a non-profit membership organization dedicated to protection the global environment and preserving the Earth's natural resources and represents thirty thousand members in PA and six hundred and fifty thousand members nationally. NRDC has submitted numerous sets of comments on this draft EIS and most notably discovered that the actual CO₂ emissions from this liquid coal plant would be 3 times higher than reported. The first draft EIS misreported the CO₂ emissions at 0.8 million tons per year, while the supplemental EIS now estimates the correct CO₂ emissions at 2.3 million tons per year. CO₂ emissions from the plant to a third party and DOE accepted this as a reason not to report emissions. Selling the CO₂ is not equivalent to sequestering the CO₂ and therefore these emissions should be reported unless sequestration is specified. This misrepresentation triggered the release of this supplemental EIS for comment.

Response:

As the comment points out, DOE has corrected information about CO₂ emissions in the Supplement to the draft EIS and in this final EIS. DOE also acknowledges that sale of byproduct CO₂ for industrial or commercial use would delay its release to the atmosphere for a short time. Therefore, sale of the CO₂ stream would not be equivalent to sequestration.

SUP22-2

Research by Williams et al. shows that liquid coal has double the life-cycle CO₂ emissions of conventional petroleum. This supplement reinforces the notion that we should not be subsidizing the birth of an industry that is far from "clean" and that could leave us with a heavy legacy of greenhouse gases.

Response:

Both the Supplement to the draft EIS and Section 6.1.2 of this final EIS compare the life-cycle CO₂ emissions of the CTL fuel cycle to the life-cycle CO₂ emissions of the conventional petroleum fuel cycle. This comparison is based, in part, on work by Williams and colleagues, who have reported that life-cycle CO₂ emissions of the CTL fuel cycle are about 80% higher than from the conventional petroleum fuel cycle.

SUP22-3**Carbon Dioxide Emission Comparison to Conventional Petroleum Refinery**

The supplemental EIS argues that, with technology advancements, future large scale CTL facilities are expected to be able to achieve higher rates of CO₂ capture and sequestration than the current technology (Larson and Tingjin 2003, Southern States Energy Board 2006), potentially resulting in greenhouse-gas emissions that are lower than those resulting from use of conventional petroleum refineries that are not equipped for CO₂ capture and sequestration. Due to the additional costs associated with carbon capture and storage, it must be assumed that if a CTL facility is utilizing carbon capture and storage, it must be doing so as a result of carbon control regulations and/or their

economic implications. It is therefore reasonable to assume that the same regulations might lead an oil refinery to capture and store its carbon as well. In order to present a fair and complete range of comparisons, DOE must also consider a case where CCS is employed in both the CTL plant and the oil refinery. In any case, CTL plants with carbon capture and storage still produce nearly 10% more carbon than a conventional petroleum refinery without capture and storage.

Response:

DOE acknowledges that the potential exists for petroleum refineries to capture and sequester some CO₂ that would otherwise be released to the atmosphere. However, given the much higher costs of carbon capture in a petroleum refinery than in the proposed facilities, it is not reasonably foreseeable that petroleum refineries would implement CCS on a broad scale within the time frame of the hypothetical fuel-cycle comparison presented in DOE's cumulative impacts discussion (Section 6.1). The analysis presented in Section 6.1 already indicates the approximate magnitude of the potential cumulative impacts of CTL technology under a range of assumptions. Expanding the assessment of cumulative impacts to include the additional hypothetical scenario suggested would not add meaningful information value to the assessment.

SUP22-4

Status of Carbon Capture and Storage

The new supplement to the Department of Energy (DOE) draft environmental impact statement (DEIS) for the Gilberton coal-to-liquid-fuel plant mischaracterizes the current status of CCS technology. The DEIS states that "sequestration technology is not sufficiently mature to be implemented at production scale during the demonstration period for the proposed facilities". It is both feasible and technically practicable to carry out large, commercial scale capture and sequestration of CO₂ in geological formations today, as several projects have proven internationally. Economic, geographical and logistical factors specific to this particular plant should not be used to discredit CCS technology as a whole, and as such the statement is wrong.

Response:

The quoted statement from the supplemental EIS is specific to the proposed project and should not be interpreted as applying to CCS technology in general. Furthermore, note that geologic carbon sequestration was not part of the project as proposed to DOE. Also see the response to comment S10-9.

SUP22-5

The supplemental further states that, "Large-scale commercial deployment of the most promising carbon sequestration technologies is expected to be technically practicable within the next 15 years (CO₂ Capture and Storage Working Group 2002)." This reference is to a draft program plan (white paper) by NETL in 2001 that outlined a 15-year government program to subsidize demonstration projects. This paper did not claim that sequestration on the scale of the Gilberton project could not be implemented for another 15 years, and furthermore significant developments in understanding and deployment of CCS have taken place since 2001.

Response:

The DOE white paper is cited in Section 5.1.4 in support of the statement that large-scale commercial deployment of the most promising carbon sequestration technologies is expected to be practicable within the next 15 years, which is well within the estimated 50-year commercial operating life of the proposed facilities.

SUP22-6

Currently, the DOE regional carbon sequestration partnerships are involved in pilot-scale carbon capture and storage while the private sector, most notably BP, is pursuing projects that would sequester even larger quantities of CO₂ than would be involved at Gilberton. In addition, the amounts already being sequestered from Beulah and Labarge in the US are the same order of magnitude as the Gilberton emission stream. While Beulah, Labarge and Carson are, or would be, injection projects occurring in oil fields, other projects (Sleipner and In Salah) are successful examples of commercial sequestration operations in other types of reservoirs.

Response:

DOE is aware of the ongoing and planned enhanced oil recovery and CO₂ sequestration projects mentioned in the comment,¹ all of which take advantage of physical conditions and economic situations favorable for this type of activity. These large-scale projects are good examples of carbon capture and sequestration, but they do not represent the full range of deployment opportunities needed to accommodate the quantities of CO₂ potentially available for sequestration. DOE is actively supporting demonstrations of technologies for geologic carbon sequestration in order to develop the information needed to support broad deployment of the technology. DOE expects that the project proposed by WMPI, which would incorporate capture of a segregated CO₂ stream, would provide valuable information for future facilities that are designed to both capture and sequester CO₂.

SUP22-7

The DEIS' conclusions are clouded by the fact that there is a distinct lack of geological storage site mapping in Eastern Pennsylvania. The DEIS focuses almost exclusively on coal seams or sinks in the Western part of the state, without considering the potential for other types of sink in the vicinity of Gilberton. The fact that the local geology has not been examined sufficiently should not be used to draw generalized conclusions about the feasibility of CCS as a technology.

Response:

In preparing Section 5.1.4, DOE considered available information about the geology of eastern Pennsylvania and identified a potential for geologic sequestration of CO₂ in Schuylkill County coal beds that may contain a commercially viable coal bed methane resource. The EIS discussion of geologic sequestration is specific to the proposed project. The EIS does not draw general conclusions regarding the feasibility of geologic sequestration of CO₂.

SUP22-8

Finally, DOE's much touted FutureGen project, scheduled to begin operation in 2012, is an unambiguous example of the government's position that we know enough now to store safely several million tons of CO₂ per year underground.

Response:

The proposed facilities and the FutureGen project would both contribute to the DOE-supported process to develop and demonstrate CO₂ capture and storage technology. This process first

¹ CO₂ from a coal gasification plant in Beulah, North Dakota, is used for enhanced oil recovery in the Weyburn Oil Field in Saskatchewan, Canada. CO₂ removed from natural gas produced at LaBarge, Wyoming, is used in enhanced oil recovery in Rangely, Colorado. At Sleipner in the North Sea and In Salah in Algeria, CO₂ removed from natural gas is injected into strata above or below the gas-bearing units. In the proposed Carson project in southern California, CO₂ produced in a hydrogen plant would be used in enhanced oil recovery in nearby oil fields.

requires the validation of the coal-to-liquids production technologies and later, as the FutureGen project is deployed, confirmation that CO₂ capture and storage technology are proven and safe for commercial application. As noted in response to comment SUP22-6, DOE expects that the project proposed by WMPI, which would incorporate capture of a segregated CO₂ stream, would provide valuable design information for FutureGen and other future facilities designed to both capture and sequester CO₂.

"Mike Ewall" <catalyst@actionpa.org> 2/27/2007 3:27 PM

Dear Ms. Bell,

My comments on the Supplement to the Draft Environmental Impact Statement for the Gilberton Coal-to-Clean Fuels and Power Project (DOE/EIS-0357D-S1) are attached as the "CO2 amendment comments.pdf" file. The documents I reference in my comments are also attached and are intended as comments of their own, to be addressed in this DEIS process.

Please confirm the timely receipt of these comments.

Mike Ewall
1434 Elbridge St.
Philadelphia, PA 19149
215-743-4884
catalyst@actionpa.org

Comments to

**Ms. Janice L. Bell
National Environmental Policy Act (NEPA) Document Manager
U.S. Department of Energy
National Energy Technology Laboratory
626 Cochran Mill Road,
P.O. Box 10940
Pittsburgh, PA 15236-0940.**

on the

**Supplement to the Draft Environmental Impact
Statement for the Gilberton Coal-to-Clean Fuels
and Power Project (DOE/EIS-0357D-S1)**

by

**Mike Ewall
1434 Elbridge St
Philadelphia, PA 19149
215-743-4884
catalyst@actionpa.org**

February 27, 2007

1) Capacity factor is likely inflated.

The DEIS assumes an 85% capacity factor. Where is this number coming from? Is there a solid basis to assume an 85% capacity factor for a new, experimental plant that will be testing out a variety of fuels? According to the Project Abstract (referenced in my 2/8/2006 comments on the DEIS), the plant will be processing "coals and/or coal wastes, petroleum coke, biomass, and selected industrial/municipal wastes." With this amount of experimentation, a capacity factor as high as 85% doesn't seem warranted.

SUP23-1

2) Lifetime of the Plant: 26 or 50 years?

Pages 5-1 and 6-1/6-2 of the initial DEIS state that the lifetime of the proposed refinery would be 26 years. Now, this partially amended DEIS claims a 50 year operating life. Which is it? These parts need to be made consistent. Either the rest of the DEIS has to be adjusted to account for a 50 year lifetime, or this new section must be adjusted to the previous 26 year assumed lifetime. A shorter lifespan is more realistic if one does an honest assessment of the availability of waste coal, the economics of the peaking in U.S. coal production (projected for 2032) and of coal production capacity (which peaked in 1999), the limitations of carbon sequestration, the carbon constraint policies likely to be passed in the next 50 years, and/or the viability of the competition for burnable fuels (i.e. the likelihood of a major shift to electric-powered vehicles within the next 10-50 years).

SUP23-2

See the following for references on peak coal production and production capacity:

"The Peak in U.S. Coal Production," Gregson Vaux, 2004.
http://www.fromthewilderness.com/free/ww3/052504_coal_peak.html

"Despite Being the "Saudi Arabia of Coal," Could U.S. Coal Supply Fall Short of Surging Demand? -- Study Finds Major New Investments in Coal Supply and Transportation Capacity Required" December 14, 2006.
<http://biz.yahoo.com/iw/061214/0194797.html>

3) Not all greenhouse gas emissions are being counted

Page 3 states: "*The total emissions from WMPI would include CO2 emitted directly to the atmosphere by facility operations (832,000 tons per year) plus the concentrated CO2 stream separated in the gas cleanup system (1,450,000 tons per year; Radizwon 2006), which would be emitted at the site.*"

This fails to count emissions associated with transporting and burning the fuel.

Also left out of this analysis are the CO2 emissions associated with carbon sequestration activities. Carbon sequestration processes themselves are very energy intensive and there will be emissions associated with CO2 separation, transporting the CO2 to sequestration sites (and the emissions associated with building any related pipelines – including the emissions associated with the materials used), and those associated with the sequestration/injection sites themselves.

SUP23-3

If the sequestration method involves extracting and burning natural gas, coal-bed methane or oil, the ultimate burning of those fossil fuels needs to be considered in the greenhouse gas emissions analysis, as these would be a direct result of the CO2 sequestering operations of the WMPI

facility - a result which wouldn't happen otherwise. Natural gas and coal-bed methane will release some unburned gas from leaks in the process from extraction to ultimate use, and these need to be factored in as well.

SUP23-3

The DEIS also fails to count non-CO2 greenhouse gas emissions (including water vapor, which is recognized in the DEIS as a greenhouse gas).

SUP23-4

4) Geologic sequestration is not a "promising" technology

Page 4 claims that "underground storage, or geologic sequestration, of CO2 is a promising technology." This sounds more like wishful thinking and public relations than reality. This needs to be reworded to be more objective. To temper the hype with some doses of reality, the information in the following studies and articles (most of which are attached as part of these comments) ought to be evaluated:

"Health, safety and environmental risks of underground CO2 sequestration – Overview of mechanisms and current knowledge"; Kay Damen, Andre Faaij and Wim Turkenburg, Climatic Change 2006; 74(1-3): 289-318.

"Important! Why Carbon Sequestration Won't Save Us"; Richard, Michael Graham, July 31, 2006. http://www.treehugger.com/files/2006/07/carbon_sequestration.php

"Carbon Sequestration: Speed Bump or Wall?"; Richard, Michael Graham, June 5th, 2006. http://www.treehugger.com/files/2006/07/carbon_sequestration2.php

"Potential Leakage and Toxicity Problems with CO2 Sequestration," July 31, 2006. http://www.greencarcongress.com/2006/07/potential_leaka.html

"Sequestered CO2 May Erode Absorbing Sandstone -- A Possible Snag in Burying CO2"; Kerr, Richard A., June 30, 2006. <http://tinyurl.com/25rk4e>
(full URL is:
<http://www.heatonline.org/contentserver/objecthandlers/index.cfm?ID=5992&Method=Full&PageCall=&Title=Sequestered%20CO2%20May%20Erode%20Absorbing%20Sandstone&Cache=False>)

SUP-23-5

"Gas-water-rock interactions in Frio Formation following CO2 injection: Implications for the storage of greenhouse gases in sedimentary basins"; Y.K. Kharaka, D.R. Cole, S.D. Hovorka, W.D. Gunter, K.G. Knauss, B.M. Freifeld; Geology: Vol. 34, No. 7, pp. 577–580 doi: 10.1130/G22357.1 <http://www.gsjournals.org/perlser/?request=get-abstract&doi=10.1130%2FG22357.1>

"The Weather Makers: How Man Is Changing the Climate and What It Means for Life on Earth"; Flannery, Tim, Grove Atlantic, 2005. <http://www.theweathermakers.com>

Oil and gas production in Pennsylvania and the U.S. in general will be past-peak by the time the facility starts operation. With limited and declining oil and gas extraction, it's unrealistic to assume that these methods for sequestration will be able to last for such long periods of time.

Schuylkill County's coal fields are too geologically unstable from over a century of mining practices to be reliable sequestration sites.

SUP23-5

5) Competition and economics not considered in western PA sequestration capacity

Pages 4-5 state that western Pennsylvania sequestration capacity "would be more than sufficient."

This didn't factor in competition from many other existing and proposed coal burning facilities that will be even closer to the sequestration sites. This proximity will make WMPI's competition more economically viable and could affect the availability of these sequestration sites while increasing the financial cost associated with using those sites.

SUP23-6

The DEIS is also not factoring in the incredible financial costs, energy losses and carbon emissions associated with transporting and sequestering the CO2, making it impractical. Financially, a CO2 pipeline can cost in the realm of \$1 million per mile.

6) Coal-bed Methane impacts not thoroughly examined

Pages 5-6 begin to examine the impacts of coal-bed methane, but only scratch the surface. If this is being considered, the environmental impacts need to be more fully described.

SUP23-7

"Oil and Gas at Your Door? – A Landowner's Guide to Oil and Gas Development," Oil and Gas Accountability Project, 2005. <http://www.energyjustice.net/naturalgas/cbm/>

SUP23 2/27/07

Mike Ewall
1434 Elbridge St.
Philadelphia, PA 19149

SUP23-1

1) Capacity factor is likely inflated.

The DEIS assumes an 85% capacity factor. Where is this number coming from? Is there a solid basis to assume an 85% capacity factor for a new, experimental plant that will be testing out a variety of fuels? According to the Project Abstract (referenced in my 2/8/2006 comments on the DEIS), the plant will be processing "coals and/or coal wastes, petroleum coke, biomass, and selected industrial/municipal wastes." With this amount of experimentation, a capacity factor as high as 85% doesn't seem warranted.

Response:

If the capacity factor that DOE used as a basis for environmental impact assessment is optimistic, this was appropriate, because it helps to avoid underestimating the environmental impacts of the proposed action. Also see the response to comment S10-2.

SUP 23-2

2) Lifetime of the Plant: 26 or 50 years?

Pages 5-1 and 6-1/6-2 of the initial DEIS state that the lifetime of the proposed refinery would be 26 years. Now, this partially amended DEIS claims a 50 year operating life. Which is it? These parts need to be made consistent. Either the rest of the DEIS has to be adjusted to account for a 50 year lifetime, or this new section must be adjusted to the previous 26 year assumed lifetime. A shorter lifespan is more realistic if one does an honest assessment of the availability of waste coal, the economics of the peaking in U.S. coal production (projected for 2032) and of coal production capacity (which peaked in 1999), the limitations of carbon sequestration, the carbon constraint policies likely to be passed in the next 50 years, and/or the viability of the competition for burnable fuels (i.e. the likelihood of a major shift to electric powered vehicles within the next 10-50 years).

See the following for references on peak coal production and production capacity:

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<http://biz.yahoo.com/iw/061214/0194797.html>

Response:

The assessment of potential impacts from commercial operations of the facility following the demonstration period (in Chapter 5) is now based on an assumed 50-year operating life, rather than the 26-year operating life considered in the DEIS. Section 5.1.1 acknowledges uncertainties in fuel resource availability for the full 50-year period and discusses their potential environmental implications.

SUP23-3

3) Not all greenhouse gas emissions are being counted

Page 3 states: “The total emissions from WMPI would include CO₂ emitted directly to the atmosphere by facility operations (832,000 tons per year) plus the concentrated CO₂ stream separated in the gas cleanup system (1,450,000 tons per year; Radizwon 2006), which would be emitted at the site.”

This fails to count emissions associated with transporting and burning the fuel.

Also left out of this analysis are the CO₂ emissions associated with carbon sequestration activities. Carbon sequestration processes themselves are very energy intensive and there will be emissions associated with CO₂ separation, transporting the CO₂ to sequestration sites (and the emissions associated with building any related pipelines – including the emissions associated with the materials used), and those associated with the sequestration/injection sites themselves.

If the sequestration method involves extracting and burning natural gas, coal-bed methane or oil, the ultimate burning of those fossil fuels needs to be considered in the greenhouse gas emissions analysis, as these would be a direct result of the CO₂ sequestering operations of the WMPI facility - a result which wouldn't happen otherwise. Natural gas and coal-bed methane will release some unburned gas from leaks in the process from extraction to ultimate use, and these need to be factored in as well.

Response:

Neither the use of liquid fuel by its ultimate consumers nor the sequestration of CO₂ is part of the proposed federal action considered in this final EIS. However, the CO₂ emissions associated with these activities are included in the assessment of life-cycle greenhouse gas impacts of coal-to-liquids technology that is presented in Section 6.1.2.

SUP23-4

The DEIS also fails to count non-CO₂ greenhouse gas emissions (including water vapor, which is recognized in the DEIS as a greenhouse gas).

Response:

Although water vapor is a greenhouse gas, air emissions of water vapor do not contribute to global warming. Not only is the amount of water vapor released to the air extremely small compared to the total amount of water vapor in the global atmosphere, but (unlike CO₂) water vapor does not build up in the atmosphere because the atmosphere has a limited capacity to hold water vapor. When the amount of water vapor in the atmosphere exceeds the atmosphere's ability to hold water vapor at a certain temperature, the water vapor condenses and falls to earth as rain or snow. Also see the response to comment SUP20-1.

SUP23-5

4) Geologic sequestration is not a “promising” technology

Page 4 claims that “underground storage, or geologic sequestration, of CO₂ is a promising technology.” This sounds more like wishful thinking and public relations than reality. This needs to be reworded to be more objective. To temper the hype with some doses of reality, the information in the following studies and articles (most of which are attached as part of these comments) ought to be evaluated:

"Health, safety and environmental risks of underground CO₂ sequestration – Overview of mechanisms and current knowledge"; Kay Damen, Andre Faaij and Wim Turkenburg, Climatic Change 2006; 74(1-3): 289-318.

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"Carbon Sequestration: Speed Bump or Wall?"; Richard, Michael Graham, June 5th, 2006. http://www.treehugger.com/files/2006/07/carbon_sequestration2.php

"Potential Leakage and Toxicity Problems with CO₂ Sequestration," July 31, 2006. http://www.greencarcongress.com/2006/07/potential_leaka.html

"Sequestered CO₂ May Erode Absorbing Sandstone -- A Possible Snag in Burying CO₂"; Kerr, Richard A., June 30, 2006. <http://tinyurl.com/25rk4e> (full URL is: <http://www.heatisonline.org/contentserver/objecthandlers/index.cfm?ID=5992&Method=Full&PageCall=&Title=Sequestered%20CO2%20May%20Erode%20Absorbing%20Sandstone&Cache=False>)

"Gas-water-rock interactions in Frio Formation following CO₂ injection: Implications for the storage of greenhouse gases in sedimentary basins"; Y.K. Kharaka, D.R. Cole, S.D. Hovorka, W.D. Gunter, K.G. Knauss, B.M. Freifeld; *Geology*: Vol. 34, No. 7, pp. 577–580 doi: 10.1130/G22357.1 <http://www.gsjournals.org/perlserv/?request=get-abstract&doi=10.1130%2FG22357.1>

"The Weather Makers: How Man Is Changing the Climate and What It Means for Life on Earth"; Flannery, Tim, Grove Atlantic, 2005. <http://www.theweathermakers.com>

Oil and gas production in Pennsylvania and the U.S. in general will be past-peak by the time the facility starts operation. With limited and declining oil and gas extraction, it's unrealistic to assume that these methods for sequestration will be able to last for such long periods of time.

Schuylkill County's coal fields are too geologically unstable from over a century of mining practices to be reliable sequestration sites.

Response:

Geologic sequestration of CO₂ is not part of the proposed action. DOE is actively engaged in research and development on geologic carbon sequestration through its separate Carbon Sequestration Program, with the aim of resolving engineering and environmental issues associated with these technologies, such as the issues discussed in the references cited in the comment. Before geologic sequestration could be implemented in Schuylkill County or any other location, site-specific investigations would be needed to determine the suitability of the injection zones.

SUP23-6

5) Competition and economics not considered in western PA sequestration capacity
Pages 4-5 state that western Pennsylvania sequestration capacity "would be more than sufficient."

This didn't factor in competition from many other existing and proposed coal burning facilities that will be even closer to the sequestration sites. This proximity will make WMPI's competition more economically viable and could affect the availability of these sequestration sites while increasing the financial cost associated with using those sites.

The DEIS is also not factoring in the incredible financial costs, energy losses and carbon emissions associated with transporting and sequestering the CO₂, making it impractical. Financially, a CO₂ pipeline can cost in the realm of \$1 million per mile.

Response:

DOE agrees that economics would be an important factor in determining the feasibility of any program for geologic sequestration of CO₂. However, it is not the purpose of an EIS to present business plans or detailed economic analyses of technologies, particularly when the technology is not being considered for potential inclusion in the proposed federal action.

SUP23-7:

6) Coal-bed Methane impacts not thoroughly examined

Pages 5-6 begin to examine the impacts of coal-bed methane, but only scratch the surface. If this is being considered, the environmental impacts need to be more fully described.

“Oil and Gas at Your Door? -- A Landowner's Guide to Oil and Gas Development,” Oil and Gas Accountability Project, 2005. <http://www.energyjustice.net/naturalgas/cbm/>

Response:

Coal-bed methane extraction is not part of the proposed project considered in this EIS and is not being actively considered as an alternative. It is addressed in this final EIS only as a potential future action. Therefore, a detailed assessment of its potential environmental impacts is not warranted.

Mar-12-2007 10:01am From:ESH DIVISION

4123864806

T-453 P.002 F-787

3/12/07

Bryant Arroyo
401-1126, SCI-Mahanoy
301 Morea Rd.
Frackville, Penna. 17732

March 5, 2007

U.S. Department of Energy Technology Laboratory
National Environmental Policy Act
Ms. Janice L. Bell, Document Manager
526 Cochran's Mill Road, P.O. Box 10940
Pittsburgh, Penna. 15236-0940

Re: Environmental Impact Statements
Supplemental Editions Nov. 2005 & Dec. 2006

Dear Ms. Bell:

In light of both Environmental Impact Statements, in particular, the December 2006 Supplement upon review has generated among the staff/inmates is palpable in regards to the serious health concerns we may all potentially face, if this plant is built 300ft. from this facility. There is no telling what may take place, if this plant, is built, especially, when it comes to the human instinct of self-preservation-at all costs. This will directly impact everyone's life within this place and the surroundings communities to our detriment. There hasn't gone a day without suffering the pangs of distress about considering the state we hold by envisioning the prospect of this project coming to fruition making us the inescapable victims of their experimental plant.

SUP24-1

I would like to direct your attention to an article that was published in the Pottsville Republican August 3, 2006, wherein, I made an effort to not only voice my opposition to this proposed project, but made several attempts to get assistance from the DOC, attorneys, and other newspapers. I stated:"We reject the notion that the buildings here would protect the inmates (24hrs a day/seven days a week) and staff from prolonged exposure to the hazardous chemicals because the assertions that the buildings here are 'air-tight' is an outright falsehood!" In the WMPI Section 4.1.7.7 on Environmental Justice quotes "Serious air quality impacts to this population would not be expected, however, because (1) air quality impacts would not be appreciable with the exception of temporary fugitive dust during construction, and (2) the Mahanoy State Correctional

SUP24-2

U.S. Department of Energy
Technology Laboratory
National Environmental Policy Act
Ms. Janice L. Bell, Document Mgr.
March 6, 2007
Page 2

Institution is a sealed facility in which inmates/staff would not be exposed to outside air except during periods of outdoor activity (Section 4.1.2.1). This research seems to have been done by a novice who is ignorant about the daily operations within this facility. It is obvious, that this statement is spurious, at best; and leaves me with the impression that they whimsically attempted to skirt around this vital issue about what truly awaits the entire staff/inmates, if, in fact, this plant were to be built adjacent 300ft. from this facility. I would invite you to speak directly to the Superintendent (Edward J. Klem) and have him explain the daily arrangements of how the DOC runs this place. I am quite certain you wouldn't be suprised to findout that everyone is exposed to whatever fall-out chemicals that would come from this plant every night/day. These buildings have centralized air ducts that no matter what type of filter you install could ultimately prevent or isolate everyone from the harm and exposure to these detrimental cancerous chemicals. So, I suggest that you either inquire with the Dept.'s Secy: Jeffrey A. Beard or Supt. Edward J. Klem to verify and confirm the actual exposure we face on a daily basis. In hindsight, the report misstates these factors in an attempt to create a false sense of security for the reader-the claims in this report are baseless and are bald face assertions made prematurely without any type of research or confirmation from a DOC official-doesn't exist. This raises several important questions. Where did WMPI officials get to their information from? who is responsible for making this bald face assertion(s)? Did anyone of them ever get a visitor's pass and tour this compound in order to arrive, at this conclusion? Categorically, this wasn't done-they just filled in the blanks thinking nobody would catch them in their own unsubstantiated remarks in the report. They failed or just never did any type of research to end up making these outright false statements.

SUP24-2

SUP24-3

Another issue of concern, is the section of 3.9/3.9.1 dealing with the human health aspect, which was my main issues layed-out in my article titled:"Local Community Potential Target For Environmental Terrorism," which goes right into the hazards we could face, if this plant is built and the serious factors facing the elderly residents of Schuylkill County and especially those who have an already compromised (weakened) immune system because of a number of present medical problems, which would result in their bodies not resisting the toxic chemical fall-out compounding their medical conditions and ultimately death.

SUP24-4

U.S. Department of Energy
Technology Laboratory
National Environmental Policy Act
Ms. Janice L. Bell, Document Mgr.
March 6, 2007
Page 3

Due to the outdoor/indoor air quality-the amount of dust is a common problem in this place for both asthmatics and those with allergies, etc. Both of these illnesses are mainly focused on the minority population, as referenced in the November 2005 Supplement under this section of human health. These are the kinds of things your office needs to hammer home in a public hearing. I would like to make the recommendation of having you either read/highlight certain parts of my article, at any future public hearings in order to inform the public, at large.

SUP24-4

However, I do realize all of the departments have tough choices to make; but that doesn't mean that commonsense and practical reasoning can be tossed out the window. I urge on behalf of the staff/inmate population, as well as all who contributed to this proposed projects research and interjected past/present analysis of the detrimental aspects of the chemical fall-out from this proposed plant to carefully weigh and consider all of the various factors (Human-beings) I have raised in the above-mentioned article. The pitfall is to succumb to the error in human thinking which is that a dangerous plan is better than no plan!

SUP24-5

In any event, I await for your response and comments in regards to the materials enclosed. Also, I almost forget to mention, that I do apologize for being tardy in my submission to have my concerns acknowledged for the public forum period ending on February 27, 2007. There were minor trivial things that had occurred on getting my hands on both EIS statements/supplements and review them before the deadline. I am not sure what did the Mahanoy Township Supervisors Chairwoman, Sharon R. Chiao did with over 900 formal objection letters we inmates sent her office. You may want to make an inquiry about our efforts and what happened to those formal letter that were sent/received by her office. These formal letter should have been highlighted or made note of as a submission on behalf of the inmate populace. Please let me know, after inquiring about these formal letters, what did the Township do with them? They should have sent them over to your office-the Dept. of Energy in order to make the submission deadline in order to acknowledge/highlight our concerns for the record. I am not sure, but, I am somewhat skeptical that the Mahanoy Township never sent these letters to your office. Since, you never made any mention or

SUP24-6

Mar-12-2007 10:02am From-ESH DIVISION

4123864806

T-453 P.005/014 F-787

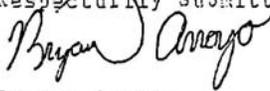
U.S. Department of Energy
Technology Laboratory
National Environmental Policy Act
Ms. Janice L. Bell, Document Mgr.
March 5, 2007
Page 4

documented anything regarding these letters in your December 2006 final draft edition which was considered the final EIS statement. Nowhere, in this supplement is there one formal objection letter attached for the record. We don't appreciate being black-balled as part of the population on voicing our concerns.

SUP24-6

From the residents at SCI-Mahanoy, we greatly appreciate your time and consideration in reviewing our thoughts and correspondence for the sake of all involved.

Respectfully Submitted,



Bryant Arroyo

w/encs.

cc:File

- Thomas A. Linzey, Esq.
- Nancy Garcia, PUPJ
- John M. Teeney, Esq.
- Phila. Daily News
- Pottsville Republican
- Carol Clarke, York Daily Record
- Supt. Edward J. Klem
- Secy. Jeffrey A. Beard, Ph.D.

P.S. I am requesting that you kindly send me a courtesy copy of both EIS Statements-Supplements of Nov. 2005 & Dec. 2006 editions for my personal reserach/file. Thank you in advance, for your gesture in providing me with said materials. Thanks again!

SUP24 3/12/07

Bryant Arroyo
301 Morea Rd.
Frackville, PA 17932

SUP24-1

In light of both Environmental Impact Statements, in particular, the December 2006 Supplement upon review has generated among the staff/inmates is palpable in regards to the serious health concerns we may all potentially face, if this plant is built 300 ft. from this facility. There is no telling what might take place, if this plant, is built, especially, when it comes to human instinct of self-preservation-at all costs. This will directly impact everyone's life within this place and directly impact everyone's within this place and the surrounding communities to our detriment. There hasn't gone a day without suffering the pangs of distress about considering the stake we hold by envisioning the prospect of this project coming to fruition making us the inescapable victims of their experimental plant.

Response:

Effects of the proposed project on human health are discussed in EIS Sections 4.1.2.1, 4.1.9, and 4.1.10. Fugitive dust emissions during construction would occur over a relatively short time period, and could readily be controlled by water-spray trucks. All maximum ambient concentrations of criteria air pollutants were estimated to be less than their corresponding significant impact levels. The increase in noise levels during operation of the proposed project are expected to be imperceptible at the Mahanoy State Correctional Institution. Also, see response to Comment 89-1.

SUP24-2

I would like to direct your attention to an article that was published in the Pottsville Republican August 6, 2006, wherein, I made an effort to not only voice my opposition to this proposed project, but made several attempts to get assistance from the DOC, attorneys, and other newspapers. I stated: "We reject the notion that the buildings here would protect the inmates (24hrs a day/seven days a week) and staff from prolonged exposure to the hazardous chemicals because the assertions that the buildings here are 'air-tight' is an outright falsehood!" In the WMPI Section 4.1.7.7 on Environmental Justice quotes "Serious air quality impacts to this population would not be appreciable with the exception of temporary fugitive dust during construction, and (2) the Mahoney State Correctional Institution is a sealed facility in which inmates/staff would not be exposed to outside air except during periods of outdoor activity (Section 4.1.2.1). This research seems to have been done by a novice who is ignorant about the daily operations within this facility. It is obvious, that this statement is spurious, at best; and leaves me with the impression that they whimsically attempted to skirt around this vital issue about what truly awaits the entire staff/inmates, if, in fact, this plant were to be built adjacent 300ft. from this facility.

Response:

The reference to the correction facility as "sealed" has been corrected in the final EIS. Also, see responses to comments 31-26, 48-1, and 24-1.

SUP24-3

"...I would invite you to speak directly to the Superintendent (Edward J. Klem) and have him explain the daily arrangements of how the DOC runs this place. I am quite certain you wouldn't be surprised to find out that everyone is exposed to whatever fall-out chemicals that would come from this plant every night/day. These buildings have centralized air ducts that no matter what type of filter

you install could ultimately prevent or isolate everyone from the harm and exposure to these detrimental cancerous chemicals. So, I suggest that you either inquire with the Dept.'s Secy: Jeffrey A. Beard or Supt. Edward J. Klem to verify and confirm the actual exposure we face on a daily basis. In hindsight, the report misstates these factors in an attempt to create a false sense of security for the reader-the claims in this report are baseless and are bald face assertions made prematurely without any type of research or confirmation from a DOE official-doesn't exist. This raises several important questions. Where did WMPI officials get to their information from? Who is responsible for making this bald face assertion(s)? did anyone of them ever get a visitor's pass and tour this compound in order to arrive, at this conclusion? Categorically, this wasn't done-they just filled in the blanks thinking nobody would catch them in their own unsubstantiated remarks in the report. They failed or just never did any type of research to end up making these outright statements."

Response:

In the preparation of this EIS, DOE consulted with Edward K. Beleski, Mahanoy State Correctional Institution, Local President of Pennsylvania State Corrections Officer Association (see Comment 89-1) and revised the draft EIS in response to a comment letter from Robert Calik, Director of the Bureau of Operations, Pennsylvania Department of Corrections (see Comment letter 48).

SUP24-4

"Another issue of concern, is the section of 3.9/3.9.1 dealing with the human health aspect, which was my main issues layed-out in my article titled:"Local Community Potential Target For Environmental Terrorsism," which goes right into the hazards we could face, if this plant is built and the serious hazards facing the elderly residents of Schuylkill County and especially those who have an already compromised (weakened) immune system because of a number of present medical problems, which would result in their bodies not resisting the toxic chemical fall-out compounding their medical conditions and ultimately death. Due to the outdoor/indoor air quality-the amount of dust is a common problem in this place for both asthmatics and those with allergies, etc. both of these illnesses are mainly focused on the minority population, as referenced in the November 2005 Supplement under this section of human health. These are the kinds of things your office needs to hammer home in a public hearing. I would like to make the recommendation of having you either read/highlight certain parts of my article, at any future public hearings in order to inform the public, at large."

Response:

The potential effects of the proposed project on correctional facility inmates and other vulnerable populations are discussed in Sections 4.1.9 and 4.1.2.1. Fugitive dust emissions during construction would occur over a relatively short time period, and could readily be controlled by water-spray trucks. All maximum ambient concentrations of criteria air pollutants were estimated to be less than their corresponding significant impact levels.

SUP24-5

"However, I do realize all of the departments have tough choices to make; but that doesn't mean that commonsense and practical reasoning can be tossed out the window. I urge on behalf of the staff/inmate population, as well as all who contributed to this proposed projects research and interjected past/present analysis of the detrimental aspects of the chemical fall-out from this proposed plant to carefully weigh and consider all of the various factors (Human-beings) I have raised in the above-mentioned article. The pitfall is to succumb to the error in human thinking which is that a dangerous plan is better than no plan!"

Response:

The comment has been noted.

SUP24-6:

“In any event, I await for your response and comments in regards to the materials enclosed. Also, I almost forgot to mention, tat I do apologize for being tardy in my submission to have my concerns acknowledged for the public forum period ending on February 27, 2007. There were minor trivial things that had occurred on getting my hands on both EIS statements/supplements and review them before the deadline. I am not sure what did the Mahoney Township Supervisors Chairwomen, Sharon R. Chiao did with over 900 formal objection letters we inmates sent her office. You may want to make an inquiry about our efforts and what happened to those formal letter that were sent/received by her office. These formal letter should have been highlighted or made note of as a submission on behalf of the inmate populace. Please let me know, after inquiring about these formal letters, what did the Township do with them? They should have been sent them over to your office-the Dept. of Energy in order to make the submission deadline in order to acknowledge/highlight our concerns for the record. I am not sure, but, I am somewhat skeptical that the Mahoney Township never sent these letters to your office. Since, you never made any mention or documented anything regarding these letters in your December 2006 final draft edition which was considered the final EIS statement. Nowhere, in this supplement is there one formal objection letter attached for the record. We don't appreciate being black-balled as part of the population on voicing our concerns.”

Response:

Four hundred letters of comment on the draft EIS were received from the inmates of the Mahanoy State Correctional Facility by way of Sharon Ciao, Chairman of the Mahanoy Township Board of Supervisors. These letters have been incorporated into the final EIS. See response to comment 92-1. Also, it should be noted that public comments on the draft EIS and DOE's responses are found in this final EIS (Appendix D). The purpose of the Supplement to the draft EIS was only to solicit comments on revised figures for CO₂ emissions from the proposed project. Public comments on the Supplement are also incorporated into this final EIS (Appendix E).

(This comment letter to DOE was accompanied by a letter written by Mr. Arroyo and submitted to a variety of individuals, organizations, and newspapers. The accompanying letter expressed the same concerns.)

Mar-12-2007 10:04am From:ESH DIVISION

4123864806

T-453 P.014/014 F-787

301 MOREA ROAD
FRACKVILLE, PA 17932NETL
3/11/07

MARCH 6, 07

MS. Janice L. Bell
 NATIONAL ENVIRONMENTAL POLICY ACT
 (NEPA) DOCUMENT MANAGER
 U.S. DEPARTMENT OF ENERGY
 NATIONAL ENERGY TECHNOLOGY LABORATORY
 626 COCHRANS MILL ROAD
 PITTSBURGH, PA 15236-0940

Dear, MS. Bell

Thank you for taking the time out to read this letter the reason I'm writing you this letter is to find out CAN YOU SEND ME SOME INFORMATION I'm looking for. I recently was talking with a friend about the GilBERTON COAL TO - CLEAN FUELS AND POWER PROJECT. I live very close to where they plan on building this plant and I am very worried about the DANGERS BECAUSE I have small kids to worry about. I would like to know if you can send me a copy of the NOVEMBER 2005 DOE/EIS-0357 draft and a copy of the supplement to the DRAFT ENVIRONMENTAL IMPACT STATEMENT for the GilBERTON COAL - TO - CLEAN FUELS AND POWER PROJECT, that came out December 2006. DOE/EIS-03570-S1. Any information you can send me on this matter will be very helpful. Thank you again for your time AND ATTENTION. you can get BACK to me at the ABOVE ADDRESS. THANK YOU AGAIN.

X Edwin FALMO #FL757
 301 MOREA ROAD
 FRACKVILLE PA 17932

SUP25-1

SUP25 3/12/07

Edwin Patino
301 Morea Rd.
Frackville, PA 17932

SUP25

“Thank you for taking the time out to read this letter. The reason I’m writing you this letter is to find out can you send me some information I’m looking for. I recently was talking with a friend about the Gilberton Coal to-Clean fuels and power project. I live very close to where they plan on building this plant and I am very worried about the dangers because I have small kids to worry about. I would like to know if you can send me a copy of the November 2005 DOE/EIS-0357 draft and a copy of the supplement to the Draft Environmental Impact Statement for the Gilberton Coal-to-Clean fuels and power project, that came out December 2006. DOE/EIS-03570-S1. Any information you can send me on this matter will be very helpful. Thank you again for your time and attention. You can get back to me at the above address. Thank you again.”

Response:

Copies of the requested documents have been provided to Mr. Patino.

Supplemental Comments on Draft Environmental Impact Statement (DOE/EIS-0357D-S1)

for

Gilberton, Pennsylvania Coal-to-Liquids Project

API appreciates the opportunity to provide supplemental comments on the Department of Energy's (DOE) draft Environmental Impact Statement (DEIS) for the proposed Coal-to-Liquids (CTL) Project in Gilberton, Pennsylvania. API is a nationwide, not-for-profit trade association representing nearly 400 member companies engaged in all aspects of the oil and gas industry, including exploration and production, transportation, refining, distribution and marketing. API's member companies are interested in - and in some cases actively pursuing or participating in - carbon capture and storage projects. Given that the final EIS could set precedents for reviews of future projects, API and its members have a strong interest in the DEIS. We offer the following supplemental comments on the CO₂ geo-sequestration (CGS) statements contained in the Draft Environmental Impact Statement (DEIS).

API would like to clarify that our comments, submitted via email on February 27th, 2007, were not directed at the merits of the Coal-to-Liquids (CTL) project per se; only at the DEIS's characterization of the maturity of sequestration (i.e. storage) technology. API would also like to clarify that only in the case where geo-sequestration is being undertaken should "The project proponent...take the necessary steps to conduct an assessment of the nearby geology and also take into account nearby population centers with appropriate mitigation of risks." If CGS is not a part of the project, there is no reason to conduct this exercise.

SUP26-1

SUP26-2

To repeat, carbon dioxide storage projects that are in the feasibility evaluation or planning stage in other areas of the USA may be affected by this DEIS. Because of this, statements regarding the maturity of sequestration technology need to be carefully considered. If API can be of further assistance, please contact Steve Crookshank (202.682.8542; crookshanks@api.org) or Russell Jones (202.682.8545; jonesr@api.org) of API's Global Climate Team.

SUP26-1

API would like to clarify that our comments, submitted via email on February 27th, 2007, were not directed at the merits of the Coal-to-Liquids (CTL) project per se; only at the DEIS's characterization of the maturity of sequestration (i.e. storage) technology.

Response:

DOE appreciates the clarification of API's earlier comments. Also, see the response to Comment SUP21-5.

SUP26-2

API would also like to clarify that only in the case where geo-sequestration is being undertaken should "The project proponent...take the necessary steps to conduct an assessment of the nearby geology and also take into account nearby population centers with appropriate mitigation of risks." If CGS is not a part of the project, there is no reason to conduct this exercise.

Response:

DOE appreciates the clarification of API's earlier comments. CO₂ geo-sequestration is not part of the proposed action. However, the EIS discusses geo-sequestration in Section 5.1.4, as a potential future action. Also, see the responses to comments SUP21-5 and SUP21-7.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

February 27, 2007

Ms. Janice Bell
National Environmental Policy Act Document Manager
U.S. Department of Energy
National Energy Technology Laboratory
626 Cochrans Mill Road
P.O. Box 10940
Pittsburgh, PA 15236-0940

RE: Supplemental Draft Environmental Impact Statement (DEIS) for the Gilberton Coal-to-Clean Fuels and Power Project. CEQ # 20050511

Dear Ms. Bell;

In accordance with the National Policy Act (NEPA) and Section 309 of the Clean Air Act, the Environmental Protection Agency (EPA) has reviewed the Supplemental Draft Environmental Impact Statement (SDEIS) for the above referenced project. The SDEIS was prepared specifically to correct information regarding carbon dioxide (CO₂) emissions from the proposed Gilberton plant; to provide information on the feasibility of carbon sequestration of the CO₂ emissions from the plant; and to present additional information regarding the CO₂-related cumulative impacts associated with potential future deployment of the proposed technology.

In response, the SDEIS has provided an analysis of the CO₂ emissions for the proposed Gilberton plant. According to the analysis, the facility will contribute an additional global emission of 2,282,000 tons per year of CO₂. Further, over the entire fuel cycle, the fuel generated by the facility will produce 80% more greenhouse gas emissions than from production and delivery of conventional petroleum-derived fuels. Finally, the SDEIS reports that CO₂ mitigation measures like carbon sequestration are considered not viable for an operational scale facility at this time.

SUP27-1

As global climate change may be attributable to increases in CO₂ emissions and other greenhouse gasses, we question how the project aligns with the objectives of the Federal government's recently developed Global Climate Change Policy (see <http://www.whitehouse.gov/ceq/global-change.html>). This policy has three basic objectives:

- Slowing the growth of emissions
- Strengthening science, technology and institutions
- Enhancing international cooperation

SUP27-2

We recommend that the FEIS provide a discussion of how the Gilberton project aligns with these

goals. We also recommend that adaptive management provisions be considered to assess CO₂ mitigation measures into the project's design as they become practicable.

] SUP27-3

Based on the concern raised above EPA has rated this SDEIS as Environmental Concerns and Insufficient information (EC-2) as described in our guidelines that can be found at: <http://www.epa.gov/compliance/nepa/comments/ratings.html>. Thank you for the opportunity to comment on this SDEIS. If you have any question please contact Kevin Magerr at (215) 814-5724.

Sincerely,

William Arguto
NEPA Team Leader

SUP27-1

Finally, the SDEIS reports that CO₂ mitigation measures like carbon sequestration are considered not viable for an operational scale facility at this time.

Response:

DOE acknowledges that geologic carbon sequestration may be a reasonable option for other projects and sites, depending on project- and site-specific physical and economic conditions. Also, see the response to comment SUP21-7.

SUP27-2

As global climate change may be attributable to increases in CO₂ emissions and other greenhouse gasses, we question how the project aligns with the objectives of the Federal government's recently developed Global Climate Change Policy (see <http://www.whitehouse.gov/ceq/global-change.html>). This policy has three basic objectives:

- Slowing the growth of emissions
- Strengthening science, technology and institutions
- Enhancing international cooperation

We recommend that the FEIS provide a discussion of how the Gilberton project aligns with these goals.

Response:

The proposed project was initiated before the cited policy (Global Climate Change Policy) was promulgated. However, the Gilberton Coal-to-Clean Fuels and Power Project was selected under the Clean Coal Power Initiative (CCPI), a program that is mentioned in the cited policy statement. In addition, the proposed project would develop an integrated technology that could contribute to the reduction of greenhouse gas emissions. The proposed project would demonstrate a CO₂ capture technology (concentrating the CO₂ stream exiting the gas cleanup system) at a commercial scale, and thus, would accelerate this technology's commercialization. This particular project, however, would not directly contribute to slowing the growth of greenhouse-gas emissions, nor is this project part of any of the international Global Climate Change partnerships.

SUP 27-3

We also recommend that adaptive management provisions be considered to assess CO₂ mitigation measures into the project's design as they become practicable.

Response:

The Final EIS outlines the carbon sequestration measures that could be implemented in the future. DOE does not, however, have the authority to direct the industrial participant to implement mitigation measures during future commercial operations of the proposed facilities.

