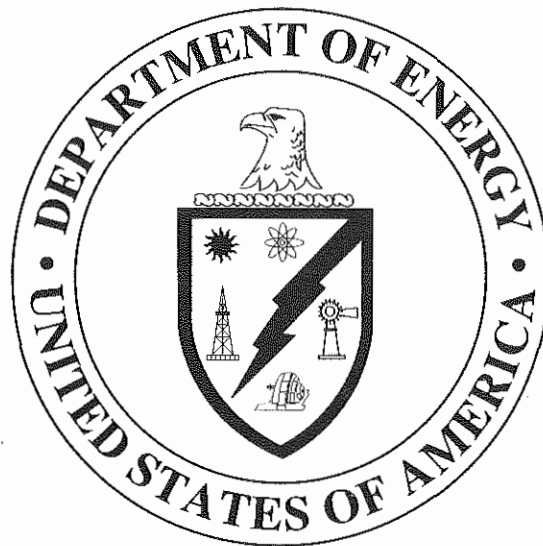


Final Environmental Impact Statement
for
the Proposed

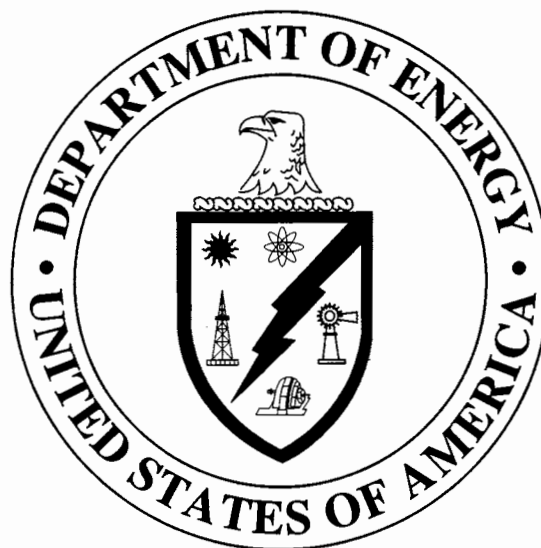
York County Energy Partners
Cogeneration Facility
York County, Pennsylvania



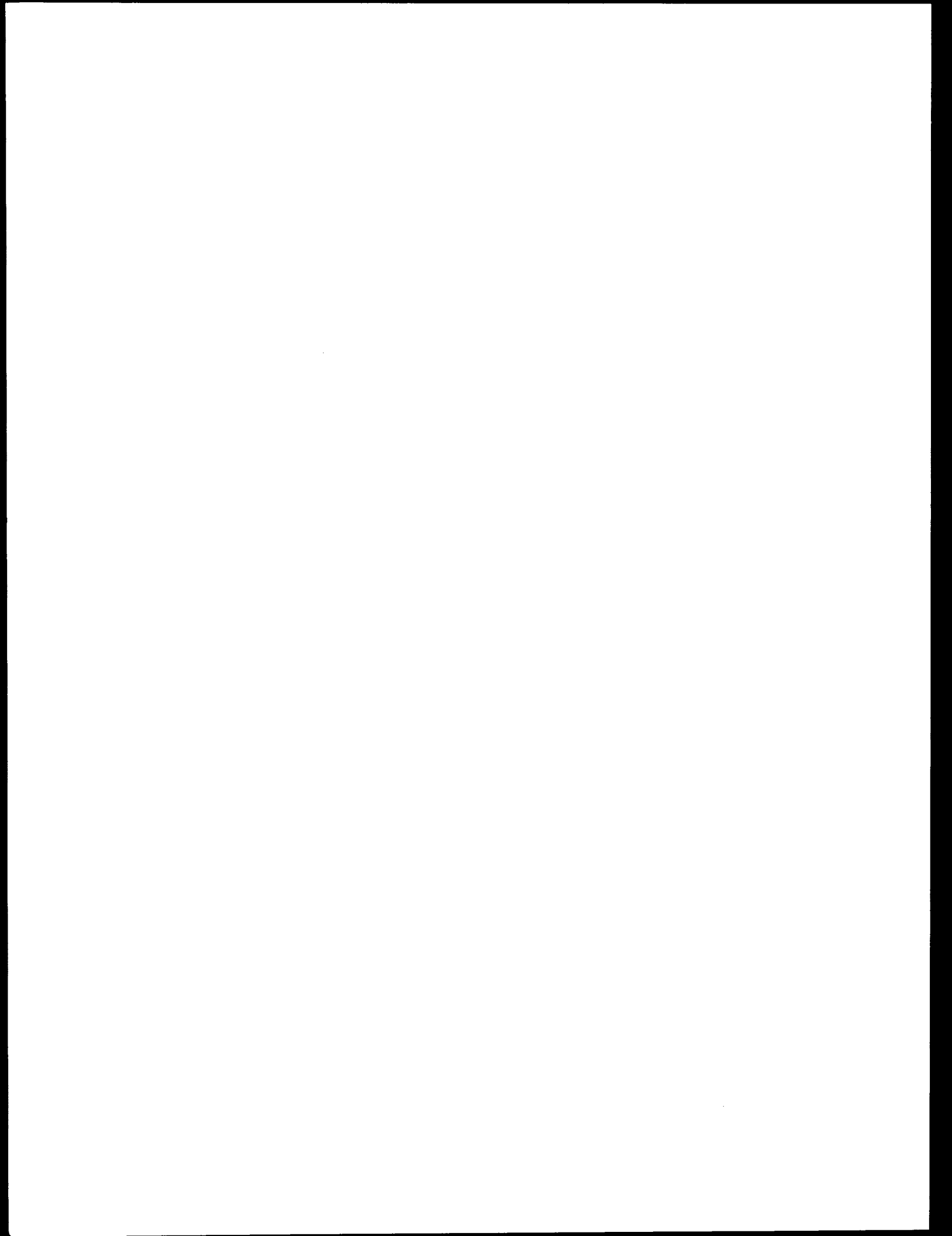
U.S. Department of Energy

Final Environmental Impact Statement
for
the Proposed

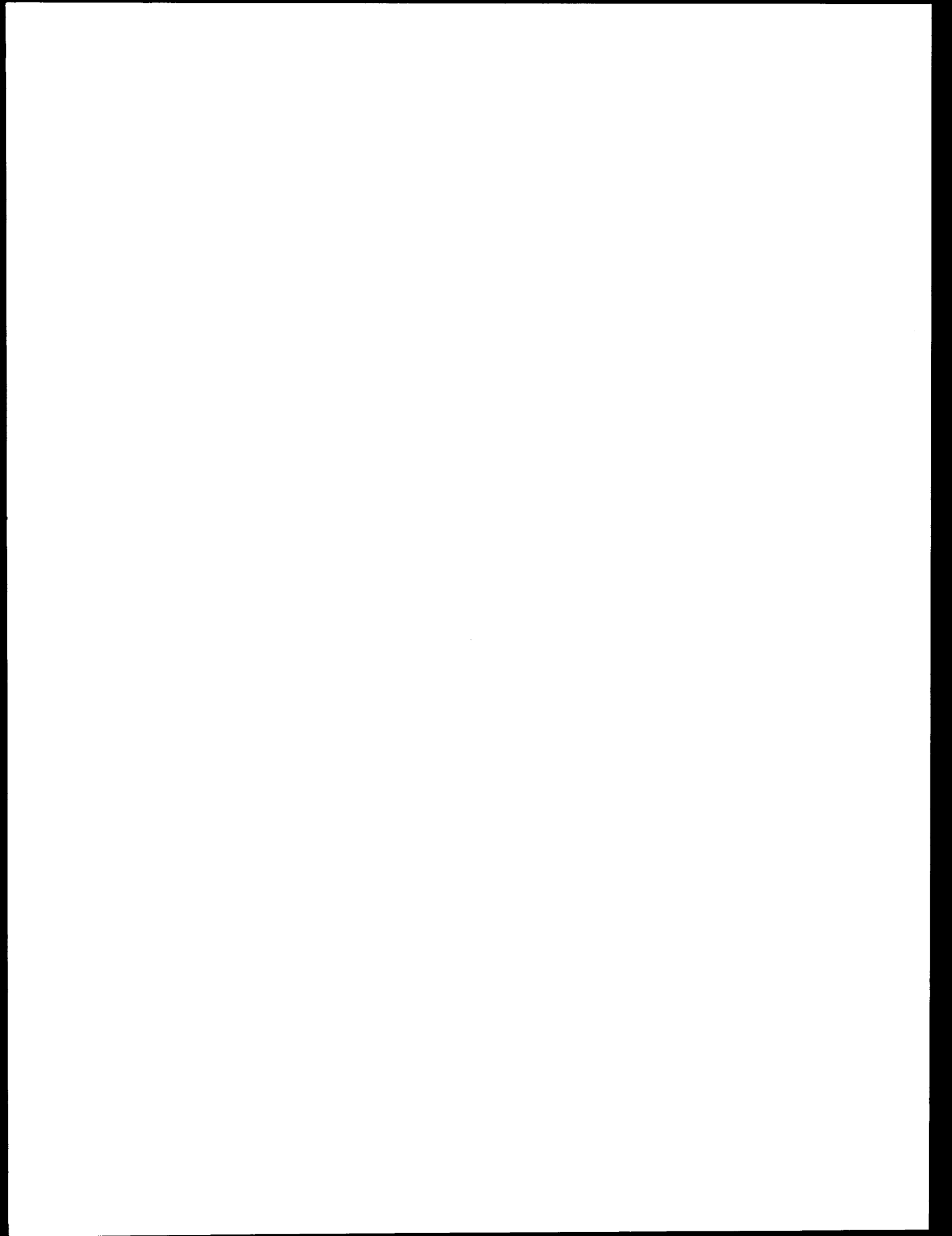
York County Energy Partners
Cogeneration Facility
York County, Pennsylvania



U.S. Department of Energy



***VOLUME III: Oral Comments on the DEIS Submitted During the
January Public Hearings***



***VOLUME III: ORAL COMMENTS ON THE DEIS SUBMITTED
DURING THE JANUARY PUBLIC HEARINGS***

This Volume contains reproductions of oral comments received on the DEIS as certified by court reporters at the public hearing conducted on January 18, 1995, at the York Fairgrounds in the Old Main building, York County, PA.

On even-numbered pages, pertinent oral comments have been annotated with a side bar and have been assigned a comment number. For oral testimony, the convention is to assign the comment a prefix of "J" (denoting a public comment received during the January public hearings), followed by a numerical designation (which denotes the page number and beginning line of the public transcript). For instance, a comment with the designation J-34/19 denotes an oral comment from the January hearing that could be found on page 34 of the January 1995 public hearing transcript, beginning on line 19.

In responses to comments, three acronyms referring to environmental impact statements are used. "DEIS" refers specifically to the Draft Environmental Impact Statement published in November 1994; "FEIS" refers to this Final Environmental Impact Statement; "EIS" refers to both the DEIS and the FEIS, in general. Thus, when a reference to the DEIS, FEIS, or EIS is made in a response to a comment, that information can be found only in the DEIS, only in the FEIS, or in both documents, respectively.

DOE addressed the pertinent and relevant comments contained in the testimony. The Department appreciates receiving all comments, and those not specifically marked for response are recorded here as being received, considered, and noted for the record by DOE.

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BEFORE THE UNITED STATES
DEPARTMENT OF ENERGY

IN RE: Proposed York County Energy Partners
Cogeneration Facility

BEFORE: Bill Lawson, Moderator
Roy L. Eiguren, Moderator
Gary Friggens
Jim Johnson
Dr. Suellen Van Ooteghem
Dr. Jan K. Wachter

HEARING: Wednesday, January 18, 1995
3:00 p.m.
Old Main Building
York Fair Grounds
334 Carlisle Avenue
York, PA 17404

513 ALLEGHENY ST.
HOLLIDAYSBURG, PA. 16648

116 SOUTH ALLEGHENY STREET
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THE ATRIUM
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137 WEST MAIN STREET
SOMERSET, PA. 15501

26 SOUTH SECOND ST.
CLEARFIELD, PA. 16830

31 NORTH MAIN STREET
GREENSBURG, PA 15601

12 EAST NINTH STREET
ERIE, PA 16501

SPEAKERS: Johannes L. Scheltema
John Klunk
Margaret Klunk
Dr. Richard Clark
Linda Spillman
Robert M. Wetzel
Marty Reed
Harry E. Smith
Connie Schmotzer
Gerald W. Beck
Michael Schmotzer
David C. Palmer
Nancy Aymold
Steven Baker
George Myers
Thomas Raber
Kathy Dolan
Floyd Bistline
Honorable Todd Platts, State Representative
Curvin F. Tyson
Lori Lears
Robert Anderson

* * * * *

REPORTER: Christine E. Lazusky

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P R O C E E D I N G S

BILL LAWSON:

Ladies and gentlemen, welcome and good afternoon to this United States Department of Energy Public Hearing. This is a continuation of the public hearing --- three nights of public hearings that we had December 14th through 16th to consider the York County Energy Partners Proposed Cogeneration facility in York County, Pennsylvania.

My name is Bill Lawson and I work at the Morgantown Energy Technology Center. I'll be serving as your moderator this evening.

For the record, this meeting is being held in the Old Main Building at the York Fair Grounds in York, Pennsylvania, starting at 3:00 p.m., on January 18th, 1995.

Could I have the next slide, please? We'll be following the same agenda as we have in the previous three days, I'll give you some of the rules of

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1 this public hearing and introduce the
2 panelists here before you. Following
3 that, Jan Wachter from the Morgantown
4 Energy Technology Center, will give you a
5 brief overview of the significant findings
6 from the Draft Environmental Impact
7 Statement and then the floor will be open
8 for public comment.

9 Some administrative items
10 first. There are fire exits to my right
11 and left at the front and also, in the far
12 back to my left is another exit. There
13 are public restroom facilities back there
14 as well as a pay telephone. We'll be
15 using this public address system this
16 evening. When you are going to make
17 comment, please come up to use the podium
18 here to your right or for the left aisle
19 the microphone there so that we can hear
20 your comments.

21 The purpose of the meeting, of
22 this public hearing, is to invite comments
23 and questions on the Draft Environmental
24 Impact Statement from all interested
25 parties. All those comments will be

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1 considered and addressed in the
2 development of the final Environmental
3 Impact Statement. That final
4 Environmental Impact Statement will be
5 used in developing a record of decision
6 for this project to decide whether it will
7 go forward. At the earliest the record of
8 decision will be issued 30 days after
9 public distribution of the final
10 Environmental Impact Statement.

11 For our procedures tonight we
12 would like all speakers to register at our
13 registration desk near the entrance.
14 We're going to take speakers in the
15 following order, Federal, State and local
16 public officials; Federal, State and local
17 agencies and the public. For the public
18 the order of the speakers will be first
19 come first served. Those first registered
20 will speak first. Pre-registrants will
21 have a choice of speaking times and dates.

22 The overall order of the
23 speakers for the four days of public
24 hearings, all told, we will always give
25 preference to individuals who have not yet

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1 spoken during the four days of public
2 hearings. Speakers are limited to five
3 minutes at a time. And you'll notice that
4 we have red and green light signals at the
5 front. The green means your time is still
6 on, when it flashes red you are coming to
7 the end of your time and when it stays red
8 you have reached your five minutes.
9 Speakers should please announce their name
10 and, if appropriate, their affiliation for
11 the public record.

12 If all our registered speakers
13 have spoken and if time allows before 8:00
14 p.m. tonight the floor will be open to
15 additional non-registered commenters or
16 those non-registered commenters who have
17 not previously spoken will be given
18 preference. It is not the purpose nor the
19 intent to cross examine any speakers,
20 although myself and the panel members may
21 ask some clarifying questions or provide
22 some clarifying comment as appropriate.

23 There is a Court Reporter
24 present to prepare official transcripts,
25 they'll be made available through the

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1 public reading rooms. And, as always,
2 forms will be available for any written
3 comments or questions. Please note that
4 written comments may be submitted to the
5 Department of Energy, Morgantown Energy
6 Technology Center, for receipt by January
7 31st, 1995, at that time the comment
8 period will be closed.

9 I'd like to introduce the panel
10 here tonight. Gary Friggins, to my left,
11 is the Chief of the Clean Coal branch of
12 the Morgantown Energy Technology Center;
13 to my right Dr. Jan Wachter, the Director
14 of the Environment Safety and Health
15 Division, Morgantown, West Virginia;
16 Suellen Van Ooteghem, Dr. Suellen Van
17 Ooteghem beside him is the Environmental
18 Project Manager for this National
19 Environmental Policy Act action. She is
20 also at the Morgantown Energy Technology
21 Center and beside her Mr. Jim Johnson, who
22 is the National Environmental Policy Act
23 Compliance Officer at DOE headquarters in
24 Washington D.C.

25 We do have some other DOE

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1 officials present here, Mr. Ed LeDuc,
2 Office of General Counsel, DOE
3 headquarters, is in the audience. Mr.
4 Nelson Rekos is the project manager for
5 this proposed project at the Morgantown
6 Energy Technology Center, is the gentleman
7 turning slides. And Mr. John Ganz is
8 here, he is the National Environmental
9 Policy Act Compliance Officer at the
10 Morgantown Energy Technology Center.

11 With that, I'd like to introduce
12 Dr. Jan Wachter and he'll give you an
13 overview of the major findings in the
14 Draft EIS.

15 DR. JAN WACHTER:

16 Thanks, Bill. For the next
17 about 15 minutes I'll go over the very
18 basic findings which are presented in the
19 Draft EIS. This is by no means an
20 all-inclusive list, this sort of mimics
21 the information in the executive summary
22 of the Draft statement. This might be a
23 reiteration for some of you that have been
24 at the other previous hearings that went
25 on approximately a month ago. In terms of

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1 the visual impacts due to the proposed
2 project, there would be structures which
3 would be erected which would alter the
4 visual quality of the region but these
5 would be keeping with the existing
6 industrial setting. The tallest structure
7 would be a 395 foot stack. Visual impacts
8 were analyzed at a number of receptors in
9 the area. The impacts on those receptors
10 are described in the Draft EIS. One of
11 the closest receptors, the Lion's Club
12 picnic and fishing area, impact would
13 result. Air emissions: We looked at the
14 air emissions potentially emitted from the
15 proposed project. The primary emissions
16 would be things like sulfur dioxide,
17 oxides of nitrogen, particles and carbon
18 monoxide. The increase in ambient
19 concentrations of these primary pollutants
20 would not exceed two of the basic
21 regulatory air quality standards. One's
22 called PSD, that's the prevention of
23 significant deterioration increment
24 consumption. And the other is the
25 national ambient air quality standards.

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1 The discussion of the modeling results are
2 contained in chapter four of the Draft
3 EIS.

4 There were some concerns by the
5 National Park Service with respect to the
6 impact of the emissions from the proposed
7 plant on the SO2 emissions on the statuary
8 in the Gettysburg Military Park. The
9 findings in the EIS state that there would
10 be no impact to these statues. Due to the
11 curtailment of P.H. Glatfelter number four
12 boiler, due to the receipt of steam from
13 the proposed project, this is the
14 cogeneration aspect of the project as well
15 as other required NOx offsets, there would
16 be reductions in air pollution in terms of
17 load in the York air basin, these would be
18 2,419 tons per year of SO2, sulfur
19 dioxide, at least 217 tons per year of
20 oxides of nitrogen or NOx and
21 approximately 65 tons per year of PM-10,
22 this is based on permitted numbers and not
23 actual numbers.

24 We looked at the adverse impacts
25 which would potentially occur due to

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1 fogging and icing and plume shadowing
2 which would be potentially associated with
3 the cooling towers. Our analysis, our
4 modeling analysis, shows that there will
5 be no adverse impacts due to these.

6 It was apparent during our
7 public scoping meetings last year that the
8 principle issues which were on the minds
9 of the citizens of this area were health
10 effects.

11 We analyzed the effects of the
12 potential release of hazardous air
13 pollutants and these included acid gases
14 and toxic metals, including lead and
15 mercury. We looked at radionuclides. We
16 looked at volatile organic compounds,
17 benzene is an example of one of these, and
18 polycyclic hydrocarbons, like benzopyrene
19 as well as chloroform.

20 We conducted four different
21 health risk assessments. We looked at
22 stack emissions, cooling tower emissions,
23 radionuclides and we looked at scientific
24 studies and these including things like
25 physiological effects in animals, human

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1 epidemiology and controlled human
2 physiology studies.

3 The conclusions that were
4 included in the Draft EIS were that the
5 lifetime excess cancer rate from potential
6 exposure to air emissions from the
7 proposed project would be less than one in
8 one million. And this is generally
9 accepted lifetime cancer risks by the
10 Environmental Protection Agency.

11 We looked at non-cancer health
12 effects due to emissions from the proposed
13 project and the net result were that these
14 would not be expected or measurable.

15 Water quality issues: On the
16 average the facility would withdraw about
17 4.1 million gallons per day of P.H.
18 Glatfelter treated wastewater and consume
19 approximately 2.5 million gallons per day
20 via cooling tower evaporative losses, the
21 remainder of these two numbers goes back
22 into the P.H. Glatfelter wastewater
23 scheme.

24 The Codorus Creek flow would
25 decrease because of this evaporative loss.

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1 During normal flow situations this would
2 mean a reduction from 87 cubic feet per
3 second down to 83. Now, if you look at
4 the worst possible conditions, which are
5 termed Q 7-10, which is the lowest flow
6 over a week period during a ten year
7 period, the flow would decrease from 58
8 cfs down to 54.

9 These losses would be attenuated
10 in their river basin but the facility
11 would mitigate the consumption of water
12 during low flow periods by releasing water
13 from existing storage reservoirs or
14 private reservoirs, not Lake Marburg.
15 This was one of the concerns that the
16 citizens had, that the lake would actually
17 decrease in terms of depth.

18 For most components the
19 concentrations in P.H. Glatfelter
20 wastewater being discharged would increase
21 due to the evaporative losses but the mass
22 loadings would not increase, meaning the
23 weight of materials like salts would not
24 be expected to increase, that's the water
25 that has been evaporated away.

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1 In the worst case analysis this
2 translates to a 9.6 percent increase in
3 effective concentration of dissolved
4 species in the Codorus Creek immediately
5 downstream during these low flow cen
6 additions, the Q 7-10.

7 There would be decreases,
8 however, in P.H. Glatfelter effluent's
9 suspended solids and biochemical oxygen
10 demand and heat load and the latter two
11 parameters could improve oxygen levels in
12 the creek and this would subsequently
13 translate to improved biological life in
14 that stream area.

15 In-stream Environmental
16 Protection Agency acute and chronic
17 ambient water quality criteria would be
18 met under both low and mean flow
19 conditions except for one parameter which
20 is chloride and this would exceed the
21 chronic standards under low flow
22 conditions by a factor of 1.1. We have
23 analyzed the ramifications of this effect
24 in the Draft EIS and came to the
25 conclusion that there should be minimal

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1 impact due to the subsidence.

2 Noise: During the construction
3 there will be short-term impacts
4 associated with the purging of dirt and
5 debris from steam systems and minimization
6 measures could be required to reduce this
7 noise level.

8 Since the proposed site is in
9 close proximity to existing industrial
10 noise, changes to the noise environment
11 would not be discernible from the existing
12 sound levels during operation. This was
13 one of the key findings we found in our
14 noise analysis.

15 However, noise reduction
16 measurements would be employed to minimize
17 background noise increases during the
18 operation of the proposed project. Vent
19 silencers could be installed to lessen the
20 noise associated with the steam release
21 episodes.

22 The next area was transportation
23 and traffic. And assuming a worst case
24 analysis, such as the lack of a ride share
25 program, vehicular traffic would increase

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1 by approximately 712 vehicles per day
2 during the construction mode and by 125
3 vehicles per day during operation and this
4 would degrade the traffic flow in both the
5 a.m. and p.m. peak hours.

6 If you look at this from the
7 overall picture this translates as a five
8 percent approximate increase in traffic at
9 key intersections during the peak hours.

10 The intersection of York Road
11 and Colonial Valley Road would continue to
12 operate at acceptable levels of service.
13 However, delays would be exacerbated
14 because two intersections, the York
15 Road/Jefferson Road/Lehman Road and the
16 York Road/Roundwood Facility access drive
17 do not have signals there. The York
18 Road/Jefferson Road/Lehman Road
19 intersection already is at an unacceptable
20 condition.

21 The potential mitigation are
22 things like traffic lights, lane
23 improvements, additional storage queues
24 for log trucks at the Roundwood site. And
25 the improvements at the York

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1 Road/Roundwood Facility access drive are
2 anticipated. PennDOT has approved
3 potential mitigation measures for this
4 proposed project.

5 In terms of solid waste the
6 major solid waste that would be generated
7 by the proposed project would be ash.
8 However, this project would also generate
9 some other types of wastes, like sanitary
10 wastes and some RCRA hazardous wastes.

11 The ash by-product would be
12 hauled approximately 70 miles to the
13 Harriman Coal Corporation mines where it
14 would be used for mine reclamation and to
15 reduce the effects of acid mine drainage
16 so that there is a potential beneficial
17 use of the ash.

18 We looked at flood plains and
19 wetlands and there are certain portions of
20 the site which include rail ladder tracks
21 or a rail spur, as well as 14 to 20 power
22 line utility poles which will be located
23 in the 100-year flood plain. No major
24 impacts are expected to the flow regime or
25 dynamics due to the small area affected as

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1 well as the nature of the structures which
2 are being placed in the flood plains.

3 Approximately .7 acres of
4 identified wetlands would be unavoidably
5 traversed near the footprint of the plant.
6 Mitigation could be required for this. We
7 have to look --- we have to get together
8 with the Army Corps of Engineers to
9 determine what mitigation is actually
10 required.

11 There will be an electrical
12 interconnection corridor to the Bair
13 substation, it crosses the Codorus Creek
14 three times and it also goes across Army
15 Corps of Engineers' flood control lands
16 and this affects approximately 17 of the
17 1,759 acres. The Army Corps of Engineers
18 has leased approximately 1,500 acres to
19 the Game Commission for the conservation
20 of wildlife, of these 17 acres most is
21 cultivated land.

22 The affected Game Commission
23 habitat would include 0.9 acres of
24 riparian habitat, that's habitat which is
25 associated with banks and rivers. 0.36

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1 acre would be within the wire zone, this
2 is the area underneath the wires which is
3 more or less clearcut. 1.2 acres of
4 wooded uplands, 0.36 acres in the wire
5 zone would be affected, this translates to
6 approximately 0.72 acres of habitat which
7 would potentially be lost.

8 Some benefits that we have
9 associated with this internet ---
10 interconnection corridor line is that
11 biodiversity actually increases when you
12 put an access way through like this, as
13 well it gives access way to hunters in the
14 area.

15 The future schedule for NEPA
16 events is the comments will be due January
17 31st, 1995, that's the end of the comment
18 period. We anticipate that the final EIS
19 will be written and publicly available
20 sometime in March and the record of
21 decision is anticipated for this project
22 around April of 1995.

23 Again, this is just a very brief
24 summary of the impacts, both adverse and
25 positive, which are associated with this

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1 project. The Draft EIS contains much more
2 data, information and analysis. Thank
3 you.

4 BILL LAWSON:

5 Thank you, Jan. We are going to
6 open the public comment section of this
7 public hearing now. Let me remind you
8 that we'd like people to limit their
9 comments to five minutes at least at a
10 time, please. Please state your name and
11 any affiliation when you approach the
12 podium. In the event that we have no
13 registered speakers nor anyone wishing to
14 make a comment before the end of --- the
15 scheduled end of the meeting, we'll take a
16 recess until such time as there are
17 speakers or until we reach eight o'clock.

18 The first speaker tonight will
19 be Mr. Johannes Scheltema. Mr. Scheltema.

20 JOHANNES SCHELTEMA:

21 My name is Johannes L. Scheltema
22 and I belong to the Codorus Monitoring
23 Network. The cogenerator will discharge
24 into the air each day water vapor from
25 evaporation of three million gallons of

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J-21/23

KEYWORDS:

Air quality
Cooling tower
Evaporation
Fog

Response: Please see the response to Comment D-104/9. On the average, 3.88 cfs (2.5 mgd) of water is expected to be evaporated by the proposed facility's cooling tower [4.34 cfs (2.8 mgd) maximum], as compared to 0.93 cfs (0.6 mgd) of water evaporated by the existing P. H. Glatfelter Company's cooling tower.

1 cooling water. There's a change that has
2 been going up and down all over the place.
3 You said two and a half, that never
4 changes that much. The discharge is
5 likely to aggravate an existing fog
6 problem in Spring Grove.

(continued)

7 John Klunk has documented actual
8 fogging conditions in the Spring Grove
9 area on 1/21/94, 2/18/94, 10/12/94,
10 10/16/94, 10/19/94, 10/21/94 and 12/4/94.
11 His photographs show low fog banks 100 to
12 200 feet deep in clear blue sky --- with
13 clear blue sky above. There are some ---
14 in that one especially you see the clear
15 sky above and the fog bank and that's in
16 the order of 100 or 200 feet you see the
17 County of Spring Grove underneath it.
18 This fog bank in the Spring Grove valley
19 is often two by two miles in size and 100
20 to 200 feet deep.

21 The Glatfelter Paper Company
22 evaporates one and a half million gallons
23 of water from its ponds and stacks each
24 day. This amount of water vapor can
25 saturate a volume of air four square miles

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J-22/7

Response: Comment is noted. The analysis of these photos is provided in Section 3.1.2 of the FEIS.

KEYWORDS:

Fog

J-22/21

Response: Comment is noted.

KEYWORDS:

Evaporation

1 in area and 314 feet deep if the air
2 temperature is at 32 degrees.

3 If the air is originally at 50
4 percent humidity the volume would double
5 or would 628 feet deep. This is the
6 amount produced in one day. It would take
7 only four hours to fill this valley to 100
8 feet deep. With a humidity of 75 percent
9 it would take only two hours to fill it
10 100 feet deep.

11 The Draft EIS statement states
12 that three million gallons of water per
13 day for cooling purposes, the major
14 portions will be evaporated and expelled
15 into the air of Spring Grove. Add this
16 additional water vapor from the
17 cogenerator to the existing water vapor
18 from the paper plant, then it would
19 require only one and a quarter hours at 50
20 percent humidity and only 38 minutes at 75
21 percent humidity to fill this valley with
22 fog 100 feet deep.

23 John Klunk presents these
24 photographs, we just saw some of them at a
25 scoping meeting but they were ignored by

(continued)

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J-23/11

KEYWORDS:

Air quality
Cooling tower
Evaporation
Fog

Response: The consumptive water use at the existing P. H. Glatfelter Company paper plant is 0.93 cfs (0.6 mgd). Thus, a maximum of 0.6 mgd of water could be evaporated. This amount is a relatively small fraction of the approximately 4.65 cfs (3 mgd) of water that could be evaporated from the proposed YCEP cooling tower. The conservativeness of both the Seasonal Annual Cooling Tower Impacts (SACTI) model used to assess the potential for fogging or icing as a result of the proposed cooling tower, and the input parameters, bounds the additional evaporative input from the P. H. Glatfelter Company plant. Please see also the response to Comment D-104/9.

J-23/23

KEYWORDS:

Air quality
Documentation
Fog and ice

Response: Please see the response to Comment D-62/8.

1 the writers of this Draft EIS. In fact,
2 the EIS states, page 3-14, there have been
3 no documented reports of fogging and icing
4 in the vicinity of the proposed project
5 site as a result of the current P.H.
6 Glatfelter Company operations.

7 The Draft EIS claims there is no
8 fogging problem. On page 4-39, four dash
9 39, the results of the Seasonal Annual
10 Cooling Tower Impact modeling indicates
11 that operations of the proposed cooling
12 tower would result in no predicted
13 occurrence of cooling tower fogging on
14 States roads in the surrounding area. And
15 it continues with, there are --- quote,
16 there are not incidents of cooling tower
17 induced icing expected due to the proposed
18 facility. The model indicates that along
19 York Road, Route 116, located 984 feet
20 southeast of the proposed cooling tower,
21 there would be no hours of plume fogging
22 and no hours of road icing, end of quote.

23 The EIS results concerning
24 fogging and the air quality in general
25 were made using computer models with

(continued)

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J-24/23

Response: Please see the responses to Comments D-62/8, D-153/15, and D-155/11.

KEYWORDS:

Air quality
Fog
Modeling

Figure 3.1-4 in Section 3.2 of the EIS shows wind rose data from the nearby West Manchester site; the preceding Figure 3.1-3 shows wind rose data from the NWS station at Harrisburg. Both data sets indicate that, in general, the regional winds are westerly.

1 questionable data rather than the actual
2 observations and measurements. Their
3 model assumes the ground is flat and that
4 the wind comes primarily from the west.
5 They have no on-site substantiation
6 weather data.

7 The ground is not flat. The
8 Codorus Creek valley is flanked by hills
9 between 200 and 40 feet high, the valley
10 progresses from the southwest to the
11 northeast, widens at Spring Grove to two
12 miles and widens further to four miles
13 northeast of town.

14 Wind generally flows through a
15 valley. In this case the wind would tend
16 to flow towards the northeast or to the
17 southwest, the direction of the valley.
18 Anybody who's ever sailed in a sailboat in
19 a river or canoed in a river knows that
20 the wind follows the river or follows the
21 valley.

22 Ground level meteorological data
23 from the EIS was collected from West
24 Manchester Township, which is six miles
25 away, and the North --- the National

(continued)

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J-25/7

Response: Comment is noted. Please see the response to Comment D-155/11.

KEYWORDS:

Meteorological data

1 Weather Bureau Service office in
2 Harrisburg, which is 25 miles away.
3 Furthermore, Harrisburg is obviously too
4 far away and influenced by the stabilizing
5 effects of a large river, the Susquehanna.

6 Upper air data is from the
7 National Weather Service Dulles
8 International Airport, Virginia, which is
9 two climate zones away and is 75 miles
10 away. The maximum recommended distance
11 for ground level meteorological data is
12 six miles. None --- neither of the ground
13 level sites are representative for the
14 microclimate of Spring Grove, both are in
15 primarily level area where Spring Grove
16 --- while Spring Grove is in a narrow
17 valley.

18 The closest wind measurements
19 are from West Manchester Township at Baker
20 plant. The Environmental Impact Statement
21 contains two wind roses, West Manchester
22 and Harrisburg, which record the wind
23 strength and duration percentage from the
24 16 points of the compass.

25 If you look at these wind roses

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J-26/3

Response: Please see the response to Comment D-155/11.

KEYWORDS:

Meteorological data
Modeling

J-26/6

Response: Please see the response to Comment D-155/11. As discussed, twice daily, upper wind data was obtained from Dulles International Airport in Virginia. Dulles is the nearest site that collects upper wind data. Upper wind data is independent of surface features and is consistent over large regional areas. Upper wind measurements are only measured by the National Weather Service from a limited number of sites in the United States. The use of the Dulles upper wind data was considered to be appropriate. As discussed in Section 4.1.2 of the EIS, surface meteorological measurements were taken at the West Manchester site, approximately 10 km (6 mi) to the northeast, for the 1-year period, January through December 1992. These data were also used in the modeling analyses.

KEYWORDS:

Fog
Meteorological data
Modeling

1 you see one very characteristic thing. I
2 don't want to quote all of them. But the
3 Harrisburg wind rose shows an extreme
4 directional effect and that's probably due
5 to the river, whereas the Manchester site
6 has the directions scattered all over the
7 place. I can give you an idea of the
8 Manchester one here. For instance, the
9 maximum percentages, 11 percent to the
10 south southwest, the next one is 10.5
11 percent to the west northwest, then
12 there's another one at 10.5 to the
13 northwest. And Harrisburg has them all
14 within one point of the compass going to
15 the west. And the Harrisburg one has 38
16 percent total of these, we can take the
17 highest three, whereas West Manchester is
18 only 32.

19 Notice that the Harrisburg wind
20 shows a strong tendency --- most of the
21 prevailing winds are westerly,
22 characteristic of a valley wind, but the
23 Baker plant does not show this strong
24 directional tendency.

25 The question remains, what is

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J-27/2

Response: Comment is noted.

KEYOWRDS:

Meteorological data

J-27/25

Response: There are no wind data from Spring Grove. Figure 3.1-4 in Section 3.2 of the EIS shows wind rose data from the nearby West Manchester site approximately 10 km (6 mi) to the northeast. The preceding Figure 3.1-3 shows wind rose data from the NWS station at Harrisburg, 40 km (25 miles) to the north-northeast. Both data sets are similar and indicate that, in general, the regional winds are westerly. In addition, Pennsylvania Department of Environmental Resources (PADER), in a letter dated September 17, 1993 (see Appendix E), indicated that the West Manchester and North Codorus sites "are in the same wind regime."

KEYWORDS:

Fog
Meteorological data
Modeling

1 shape of the Spring Grove wind rose? I
2 doubt that the wind is as strong as either
3 Harrisburg or West Manchester or the
4 prevailing wind directions that are east
5 and west as assumed in the EIS.

6 I do not have any weather data
7 concerning Spring Grove nor do the writers
8 of the EIS, such as the number of days of
9 fog, their duration, the temperature and
10 the relative humidity, dew point or the
11 number of days of temperature inversions.
12 What is clear is the addition of this
13 large quantity of water vapor can only
14 aggravate an already existing fog problem
15 and that the EIS is probably wrong. Thank
16 you.

17 BILL LAWSON:

18 Thank you, Mr. Scheltema. Mr.
19 Scheltema, your comments will be addressed
20 in the final Environmental Impact
21 Statement.

22 JOHANNES SCHELTEMA:

23 Yeah, I gave you a copy.

24 BILL LAWSON:

25 Excuse me, Mr. Scheltema, we

(continued)

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J-28/6

KEYWORDS:

Baseline
Cooling tower
Evaporation
Fog

Response: No on-site meteorological data currently exist for Spring Grove. In this case, the best meteorological data available as weather input to the Seasonal Annual Cooling Tower Impacts (SACTI) model that was used to assess fogging and icing potential was assembled by creating a hybrid meteorological data base. Please see also the response to Comment D-104/9.

1 have one question.

2 DR. JAN WACHTER:

3 As a point of clarification,
4 were all the slides that you showed on the
5 screen, were they presented in the
6 transmittal to us a couple weeks ago?

7 JOHN KLUNK:

8 Many of the images were taken at
9 the same time but this was taken with a
10 different camera. The transparency film
11 --- I also had a camera. I don't have
12 transparencies of all the ones I sent to
13 you. And I do have additional photographs
14 that I've taken since the ones that I
15 submitted to you.

16 DR. JAN WACHTER:

17 I would like to talk to you
18 sometime after the meeting or during a
19 break or something because there's a ---
20 we have all your pictures from before and
21 we've given it to a different contractor
22 to look at and I think we may be missing
23 one or two pictures in the scheme of
24 things. I'll have to get back to you.

25 JOHN KLUNK:

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1 You have a list of what I sent
2 you?

3 DR. JAN WACHTER:

4 Right.

5 JOHANNES SCHELTEMA:

6 They were sent to the EPA.

7 DR. JAN WACHTER:

8 Pardon me?

9 JOHANNES SCHELTEMA:

10 They were also sent to the EPA,
11 they were very interested.

12 BILL LAWSON:

13 Thank you, Mr. Scheltema. Mr.
14 John Klunk. Good afternoon.

15 JOHN KLUNK:

16 Thank you. I have quite a bit
17 of material here. What I'm going to do is
18 begin and hit the higher points and if
19 time permits I'll go back and elaborate on
20 some of them. So basically what some of
21 these statements will be is abbreviated
22 parts of what I submitted in writing. I'm
23 representing the Codorus Monitoring
24 Network. The major purpose of the Codorus
25 Monitoring Network is to advocate

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J-30/22

Response: Comment is noted.

KEYWORDS:
Water quality

1 improvement in Codorus Creek which
2 historically and presently is seriously
3 degraded by industrial pollution. The
4 stream bed has been allowed to exceed
5 State water quality standards for
6 temperature and the color due to
7 exceptions granted to the P.H. Glatfelter
8 Company by Pennsylvania DER and the
9 Environmental Hearing Board. The
10 residents of York City and York County
11 have been deprived of the full potential
12 aesthetic and recreational value of
13 Codorus Creek, largely due to odor, color
14 and diminished fishing caused by
15 discharges from P.H. Glatfelter. In the
16 long term, over the expected operating
17 period of the proposed Energy Partners
18 coal burning power plant significant
19 improvements are likely to occur in
20 Codorus Creek water quality without the
21 York County Energy project. If the York
22 County Energy project is built it would be
23 a limiting factor to achievement of such
24 improvement.

(continued)

25 The Draft Environmental Impact

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J-31/15

KEYWORDS:

Codorus Creek
Water quality

Response: DOE believes that the proposed facility would not be a limiting factor to improvement in the water quality of Codorus Creek. While cooling tower evaporative losses would increase the concentration of pollutants in the cooling tower blowdown, further improvements in P. H. Glatfelter Company's secondary treatment process would continue to yield improvements in the quality of the discharge. Thus, the in-stream quality of Codorus Creek could improve. In addition to these improvements (e.g., reduction in color), the proposed project would have some positive impact on stream quality by reducing the heat load and biological oxygen demand, thereby increasing dissolved oxygen concentration in Codorus Creek, especially during the summer and fall low-flow periods. Dissolved oxygen is arguably one of the most important parameters that determines the "health" of a body of water. It should be noted that there are various dischargers to Codorus Creek both upstream and downstream of the proposed discharge point for the proposed action. These cumulative discharges affect the overall quality of Codorus Creek.

J-31/25

KEYWORDS:

Cumulative effects,
Water quality

Response: DOE in its FEIS acknowledges that improvements to water quality would result from the P.H. Glatfelter Company modernization process, and that these improvements would be degraded due to the proposed project. See Tables 4.1-27 and 4.1-28.

1 Statement produced by U.S. DOE is short
2 sighted for failing to recognize the
3 likelihood for improvements in processes
4 and wastewater treatment at the Glatfelter
5 facility which are likely to occur without
6 the YCEP coal burning plant. It should
7 not be assumed that Codorus Creek,
8 downstream of Glatfelter facility, could
9 not support trout. If Glatfelter were to
10 make more efficient use of waste heat,
11 improve their processes and waste
12 treatment, it would be possible. The July
13 14th, 1993, report from Glatfelter Company
14 to Pennsylvania DER on the fish kill
15 caused by an accidental release of
16 sulfuric acid to the mill pond included
17 smallmouth bass, largemouth bass, crappie
18 bass, northern pike and three brown trout
19 averaging over eight inches. These fish
20 obviously had to come from somewhere
21 within the reach from the mill pond to the
22 wastewater outfall one, indicating they
23 are very close and they do survive
24 upstream.

(continued)

25 The Draft Environmental Impact

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J-32/6

KEYWORDS:

Codorus Creek
Trout
Warm water fishery

Response: DOE could reasonably assume that Codorus Creek, downstream of P. H. Glatfelter Company's discharge, could not support trout based on the fact that the Pennsylvania Department of Environmental Resources (PADER) has classified this portion of the creek as a warm water fishery. Presumably, PADER based its classification on investigations and data. Furthermore, none of the field studies described in Section 3.1.5.1 of the EIS produced evidence of any particular trout, salmon, or bass species inhabiting this section of Codorus Creek. It is reasonable to assume that the trout (a cold water fish) recovered by PADER after the accidental release incident most likely came from above the P. H. Glatfelter Company's outfall, a designated cold water fishery (CWF) (beginning above the mouth of Oil Creek). The site-specific criteria, recalculated according to EPA guidelines, are only applicable below the outfall, where Codorus Creek is a designated warm-water fishery (WWF).

J-32/10

KEYWORDS:

Fish kill

Response: Comment is noted.

1 Statement is shortsighted for not
2 considering the likelihood of future needs
3 to withdraw more water from Lake Marburg
4 to accommodate increased demand by the
5 Glatfelter Company caused by increases in
6 production capacity at the Glatfelter mill
7 and the resulting need for more water to
8 be drawn from Lake Marburg to facilitate
9 dilution to meet present water quality
10 standards or more stringent regulatory
11 requirements imposed in the future. It
12 should not be assumed that the Glatfelter
13 Company would not exercise their right to
14 draw more than double the amount of water
15 they now do from Codorus Creek and Lake
16 Marburg in the future.

17 Tables 4.1-27 and 4.1-28 of the
18 Draft EIS indicate concentrations of total
19 dissolved solids, chlorides, sulfate,
20 calcium, sodium, suspended solids and
21 total dissolved --- total solids are
22 expected to increase with the proposed
23 YCEP operation as a result of evaporation.
24 Effects of increased concentrations,
25 conductivity and osmotic pressure on

(continued)

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J-32/25

KEYWORDS:

Lake Marburg
Water withdrawals

Response: DOE makes no assumptions regarding P. H. Glatfelter Company's future water usage and withdrawals from Lake Marburg. However, as outlined in Section 4.1.4.2.8, results of HEC-3 modeling, developed by the Army Corps of Engineers, indicate that the proposed facility would not cause P. H. Glatfelter Company to withdraw more water from Lake Marburg to support the water demands of the proposed facility. Any increases in production capacity at P. H. Glatfelter Company that lead to an increased draw down in Lake Marburg are not connected to the proposed York County Energy Partners, L.P. (YCEP) facility and, thus, are not within the scope of this EIS.

However, the need to draw down Lake Marburg to meet present or future water quality standards and regulatory requirements does deserve consideration in the EIS. If exceedances occur and an exception or variance is not granted, P. H. Glatfelter Company would have to release more water from Lake Marburg or other reservoirs during periods of minimum or low-flow to dilute contaminants. The end result is that Lake Marburg or other reservoirs would experience lower water levels than anticipated. This oversight has been corrected in the FEIS (See Section 4.1.4.2.8).

Please see also the responses to Comments D-199/10, D-200/3, J-176/18, J-179/19, and W-JK-1/28aa.

J-33/24

KEYWORDS:

Codorus Creek
Conductivity
Cumulative effects
Osmotic pressure
Water quality

Response: DOE believes that the effects of the proposed York County Energy Partners, L.P. (YCEP) facility on P. H. Glatfelter Company's wastewater effluent and Codorus Creek have been sufficiently analyzed in the Codorus Creek Water Resource Study and the Biodiversity Study for Codorus Creek and summarized in Sections 4.1.5.1 and 4.1.4.2.7 of the EIS. As shown in Tables 4.1-30 and 4.1-32, the increase in parameter concentrations is not dramatic (4 of the 8 parameters did not increase at all), and the projected concentrations are within EPA ambient water quality criteria (AWQC) levels, except for chloride (Cl) and copper (Cu) at low-flow conditions. (Copper exceedances are explained in greater detail in the responses to Comments W-LMY-1/10c1, W-LMY-1/10d, W-LMY-12/21d.) Since the concentrations of anions and cations would not appreciably increase in Codorus Creek, even at low-flow conditions, effect of any conductivity increases should be minor. Section 4.1.5.1 of the EIS states that no significant impacts to aquatic organisms in Codorus Creek would be anticipated to result from the projected chloride (Cl) and copper (Cu) levels, primarily because the AWQC are conservative. In addition, any exceedance would be marginal and would only occur under low-flow conditions. Because the

1 aquatic organisms should be thoroughly
2 evaluated with adequate consideration of
3 cumulative synergistic effects.

(continued)

4 The Draft EIS does not
5 adequately address the issue of instream
6 concentrations of all contaminants.
7 Copper, lead and mercury, cyanide and
8 phenol are parameters included in the
9 Glatfelter NPDES permit number 8869. Why
10 have all applicable water quality
11 parameters and limits not been included in
12 tables 4.1-27 and 4.1-28 of the Draft EIS?
13 They should be included and be expressed
14 as values not only in the wastewater but
15 also as projected instream values during
16 normal and low flow conditions.

17 Effects on downstream users is
18 not addressed in chapter four of the Draft
19 EIS. The Draft EIS --- the Environmental
20 Impact Statement should explain the
21 circumstances regarding downstream or
22 potential downstream users of Codorus
23 Creek. For all intents and purposes
24 Codorus downstream of the Glatfelter
25 facility is unfit for any use of water

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EIS is intended to present information directly relevant to the decision at hand and since EPA AWQC are not expected to be exceeded (with the exception noted) further information on the effects of changes in water quality were not pursued.

J-34/9

KEYWORDS:

Consumptive effects
Parameters
Standards
Water quality

Response: The effect of low-flow conditions could be approximated by multiplying most of the concentrations/parameters in these tables by 1.10 (to estimate concentrations during low-flow events) and by 1.20 (to estimate concentrations during extreme low-flow occurrences). Table 4.1-28 includes those parameters covered in the P. H. Glatfelter Company's NPDES permit that were thought by DOE to have an important overall and long-term impact in influencing water and aquatic quality in Codorus Creek. Please see also the response to Comment W-JK-1/28aa.

J-34/19

KEYWORDS:

Consumptive effects
Water quality
Water use

Response: Most sizable streams and rivers accept discharges of aqueous waste and provide water withdrawal points. This is in addition to recreation, scenic beauty, food supply, and other uses. To prevent gross pollution or over-utilization, regulations establish a system of enforcement and standards consisting of water quality criteria and protected uses (see 25 Pa. Code § 93). The idea was not to keep all surface flows pristine but to maximize their utility for the benefit of society. Some streams, like Codorus Creek, provide more benefits than others. Along with the regulatory system, the trend of increasing stream flow with increasing distance downstream prevents major users, like P. H. Glatfelter Company, from monopolizing a waste load allocation. Thus potential downstream uses are preserved. Section 4.4 of the Codorus Creek Water Resource Study (*ERM, 1994a*), which is summarized in Chapter 4.1.4 of the EIS, concludes that "The YCEP [York County Energy Partners, L.P.]-proposed consumptive use would not reduce the SRBC [Susquehanna River Basin Commission]-required minimum flow in the stream and therefore would not impact downstream NPDES [National Pollutant Discharge Elimination System] dischargers whose permits are based on this minimum flow from the mill pond."

1 from the creek due to odor, color and high
2 concentrations of contaminants. The only
3 use Codorus Creek downstream of Glatfelter
4 is suitable for is to receive the
5 discharges of the waste. Even this could
6 be potentially affected due to such a
7 large portion of the total wasteload
8 allocation for Codorus Creek being
9 consumed by Glatfelter and the factor of
10 increased concentration of contaminants
11 indicated to result from losses through
12 evaporation planned by YCEP. When YCEP
13 proposed to build this coal burning plant
14 in West Manchester Township, it was stated
15 that the facility required pure water to
16 operate and planned to use water supplied
17 by York Waste Company and was declining to
18 draw water from Codorus Creek at that
19 area.

20 Impacts on recreational uses of
21 water are not addressed in the Draft EIS.
22 This is indicated as an issue in Appendix
23 B, Environmental Impact Assessment
24 methodology, and needs to be addressed
25 with respect to existing and projected

(continued)

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Under extreme low-flow conditions, the P. H. Glatfelter Company's discharges could comprise as much as ~72 percent of the Codorus Creek flow at Spring Grove. The effect of the proposed project under these extreme low-flow conditions would be to increase the concentrations of chemical species by 20 percent at the Spring Grove site.

J-35/20

Response: A discussion of the impacts to the recreational use of water resources has been added to Section 4.1.12.3 in the FEIS.

KEYWORDS:

Recreation effects

Water use

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conditions.

Codorus Creek downstream of the Glatfelter facility and proposed York County Energy Partners site is undesirable for all forms of recreation that occur upstream of Glatfelter and in other unpolluted branches and tributaries of Codorus Creek and streams of similar size and physical characteristics in the Susquehanna basin. Boating by canoe and waterfowl hunting are possible but very little occurs because the aesthetics of the aquatic environment are negatively impacted due to odor and color from the Glatfelter discharge. Swimming and tubing are even less likely to occur than boating for the same reasons, aesthetics. If odor would not be a factor, limited visibility due to color would be a safety factor of concern for swimmers.

Sport fishing downstream of Glatfelter wastewater outfall 001 through the approximately nine river miles of public land contained by the U.S. Army Corps of Engineers is practically

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J-36/2

Response: Comment is noted. Please see the response to Comment J-35/20.

KEYWORDS:

Codorus Creek
Recreation

1 nonexistent due to aesthetics and fear of
2 eating fish which are contaminated, but
3 largely due to an almost total lack of
4 desirable fish species which occur in
5 other parts of the Codorus basin. I
6 personally have caught brown trout and
7 smallmouth bass upstream of the Glatfelter
8 mill pond. The east branch of Codorus
9 Creek is classified as cold water and high
10 quality cold water fishery and the south
11 branch supports areas of naturally
12 reproducing brown trout and is stocked
13 with brown trout by the Pennsylvania Fish
14 and Boat Commission, although it is ---
15 the south branch is classified as a warm
16 water fishery. These are DER
17 classifications. Complete and accurate
18 information on the issue of impacts on
19 recreational uses of water should be
20 included in the final Environmental Impact
21 Statement.

22 Impact on the use of Codorus
23 Creek as a fishery for Class A wild brown
24 trout is identified in the Appendix B. It
25 is not addressed in chapter four of the

(continued)

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J-37/22

KEYWORDS:

Codorus Creek
Cold water fishery
Trout

Response: Stream flow modeling by ERM (1994a) to address the effects of water consumption confirmed that there would be no impact to Codorus Creek in the cold water fishery (CWF) (trout habitat) section of the creek. Therefore, this issue was not discussed in the EIS. The methodology described in Appendix B (associated with the use of Codorus Creek as a trout fishery) was developed after the Implementation Plan and before the DEIS. This plan is intended as a guide for completion of the analysis.

1 Draft EIS, this is an issue and should be
2 addressed. I will take a break now.
3 Thank you.

4 BILL LAWSON:

5 I'm sure they'll be more than
6 adequate opportunity for you to continue.
7 Thank you for your comments, they will be
8 addressed. Ms. Margaret Klunk.

9 MARGARET KLUNK:

10 Hi. I'm Margaret Klunk and I'm
11 a member of Codorus Monitoring Network,
12 SPEAC and S.T.O.P., treasurer of Codorus
13 Monitoring Network.

14 I'm going to begin my comments
15 by talking about --- directing your
16 attention first to table 2.1-1 on page
17 2-10. If you'll notice the source is
18 listed as ENSR, 1994. ENSR, 1994 is a
19 three volume document titled Final
20 Environmental Information Volume, which
21 was compiled by ENSR for Air Products.
22 The document is over 900 pages long. And
23 somewhere in that 900 plus pages the DOE
24 found the emissions figures listed there.
25 I found them, too, but it wasn't easy.

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(continued)

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1 Please number --- everyone here who's done
2 a paper for high school or college knows
3 that when you footnote a 900 page document
4 you ought to say what pages you found it
5 on. This is consistent throughout the
6 Draft Environmental Impact Statement, you
7 cite sources that are lengthy and don't
8 tell us the page it's on. It's just
9 purely trying to obfuscate the obvious.

10 The next thing I'd like to
11 address, I'd like to address your
12 attention to table 2.2-1 on page 2-60.
13 Again, this is a table of emissions
14 figures, this is for North Codorus --- I
15 mean, for West Manchester. The source
16 cited in that table is ENSR, 1992. If
17 you'll notice DOE cites the source
18 document for that and again no pages are
19 included. I did find that one, too. And
20 what's --- the funny thing is that they do
21 not match. If you'll look at the first
22 row of figures here for the West
23 Manchester site, those are the ones that
24 actually occur in ENSR, 1992.

25 The second row, I'm not sure

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J-39/1

KEYWORDS:
Editorial
References

Response: DOE has reviewed recent EISs that have been issued under the Clean Coal Technology Program (e.g., Piñon Pine EIS, Healy EIS, Programmatic EIS). There have been no cases that page numbers have been provided when a source has been cited. DOE has also perused other EISs issued by the Department as well as other agencies and has found that providing page numbers when referencing source documents is not a common practice. Thus, the format for text references in the EIS follows the same format used in other EISs. DOE notes that the basic parenthetical reference consisting of the author's last name and year of publication is accepted by the University of Chicago Press, a source of styles listed by the U.S. Government Printing Office.

J-39/11

KEYWORDS:
Air emissions
Alternative site
documentation

Response: Table 2.1-1, Section 2.1.3, shows air emissions for the proposed York County Energy Partners, L.P. (YCEP) Cogeneration Facility adjacent to the P. H. Glatfelter Company site in Spring Grove, North Codorus Township. One hundred percent load emissions are listed as follows: Sulfur dioxide (SO₂), 2,891 tons/yr; oxides of nitrogen (NO_x), 1,437 tons/yr; particulate matter less than 10 microns in diameter (PM₁₀), 127 tons/yr; carbon monoxide (CO), 1,726 tons/yr; and volatile organic compounds (VOCs), 48 tons/yr. Approximately 2,500 tons of coal per day would be burned. Table 2.1-1 was referenced to ENSR, 1994, the Final Environmental Information Volume for the Proposed York County Energy Partners Cogeneration Facility (North Codorus, PA).

Table 2.2-1, Section 2.2.3, of the FEIS has been revised to show the air emissions for the proposed YCEP Cogeneration Facility at the alternative West Manchester Township site. This revision was based on extrapolation of more recent design and environmental performance data from the North Codorus site to the West Manchester site. One hundred percent load emissions are now listed as follows: Sulfur dioxide (SO₂), 2,300 tons/yr; oxides of nitrogen (NO_x), 1,212 tons/yr; PM₁₀, 107 tons/yr; carbon monoxide (CO), 1,454 tons/yr; and VOCs, 39 tons/yr. As shown on Table 2.2-1, 2,000 tons of coal per day would be burned.

Due to improvements in the vendor guarantee values and the refinement in project and component design, emission rates have decreased since preliminary information was developed. For instance, oxides of nitrogen (NO_x) emissions decreased from 0.15 to 0.125 lbs/MMBtu, PM₁₀ emissions decreased from 0.015 to 0.011 lbs/MMBtu, and VOC emissions decreased from 0.01 to 0.004 lbs/MMBtu.

1 where DOE got them, but that's what they
2 --- those are their figures for the
3 emissions of the criteria pollutants at
4 100 load percent for the West Manchester
5 site.

6 The third row of figures are
7 from three documents, the final
8 Environmental Information Volume, the
9 Draft Environmental Impact Statement and
10 the PSD application to Pennsylvania DER.

11 What's really strange about this
12 is that some of those figures even though
13 they're going to burn 500 tons a day more
14 coal, actually went down to the North
15 Codorus site. NOx emissions supposedly
16 would decrease by 17 tons per year, PM-10s
17 would decrease by 17.5 tons per year and
18 VOCs would decrease by 48 tons per year.

19 I'd like DOE to explain first
20 where they got their figures, that
21 certainly was erroneously cited as ENSR,
22 1992. And I'd like them to explain how
23 those figures decreased. I've been asking
24 this question for quite a while. Back in
25 April of 1994 I wrote to Richard Kenner

(continued)

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1 and asked him to explain these decreases
2 in emissions, even though they're burning
3 more coal, a lot more coal, 20 percent
4 more coal. He just wrote back to me --- I
5 asked him for specific engineering and
6 design improvements which would allow
7 this. He wrote back just saying, I think
8 I have a quote here --- this is a quote,
9 with respect to changes in other emission
10 estimates when compared to the West
11 Manchester Township project these changes
12 reflect additional design and engineering
13 which has gone into the projects and is
14 being relocated to North Codorus Township
15 site. No specifics. I then carbon copied
16 that letter and his response to Suellen
17 Van --- to Dr. Van Ooteghem, so she has
18 known about this, my questioning these
19 figures before.

20 But in response to my asking of
21 Mr. Kenner those questions I received a
22 letter from Air Products and I'm going to
23 read that into the record now. It came in
24 an Air Products envelope, letterhead,
25 Environmental and Energy Systems. Dear

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J-41/4

Response: Comment is noted.

KEYWORDS:

Air emissions
West Manchester

J-41/21

Response: Tables and figures and other information contained within the EIS have been developed based on information provided to DOE as source documents that are evaluated both by the Department and by independent contractors to help ensure their quality and veracity.

KEYWORDS:

NEPA
Quality

1 Mrs. Klunk, there are six of us here at
2 Air Products who have made up our minds
3 that enough is enough. We can no longer
4 overlook the criminal behavior of our
5 senior management, Mr. Kenner is
6 particular and continues to be --- Mr.
7 Kenner in particular, and continues to be
8 intimidated by threats of losing our jobs
9 by keeping our mouths shut.

10 "I'm sure you suspect that some
11 of the environmental reports issued have
12 been falsified by either altering data
13 prior to submission or manipulated by our
14 management with full knowledge of DOE. I
15 wish I could say it is not true but it
16 goes even deeper. The York project is a
17 true mini-series or at least a 60 Minutes
18 segment.

19 "Not only has data such as water
20 temperatures, impacts on Codorus, cooling
21 tower condensation and emissions been
22 falsified, but key DOE officials have
23 accepted very large monetary gifts. These
24 payoffs have been funneled through legal
25 fees paid to large law firms and then paid

(continued)

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1 in cash to individuals at DOE. The
2 payments would be very easy to identify if
3 you could gain access to invoices for
4 legal and permitting costs.

5 "Most of us at Air Products have
6 been on edge for over a year because of
7 very large layoffs and expectations of
8 even more layoffs this summer. Because of
9 this issue it is very difficult for us to
10 blow the whistle on the people involved in
11 all these coverups and payoffs. We also
12 find Mr. Kenner's attitude toward the
13 people in Codorus Township," they meant
14 North Codorus, "to be very distasteful,
15 and believe me, Mrs. Klunk, not in keeping
16 with Air Products' way of doing business.
17 We truly believe that if higher management
18 knew what was really going on not only
19 would Mr. Kenner lose his job, but the
20 York project would be cancelled. One of
21 his most recent comments toward Mr. Klunk
22 regarding the --- was regarding the
23 Codorus Creek. He said if that F-ing
24 Klunk thinks the place is bad now wait
25 until he sees it when we get done.

(continued)

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1 "I'm sorry we can't come forward
2 at this time because between all of us we
3 feel confident we could get this project
4 cancelled and Mr. Kenner fired. However,
5 should any of us be laid off in the
6 immediate future or if by chance called
7 upon to testify in some manner, we would,
8 of course, tell all we know.

9 "Good luck in your efforts. You
10 need to dig a little deeper and ask the
11 right questions. All the dirt is right
12 below the fingernails. Your friends at
13 Air Products." And it's signed "T, R, S,
14 M, T, & B."

15 So I just read this into the
16 record because I wanted you to understand
17 why we are so curious about these
18 figures. It obviously triggered
19 somebody's button at Air Products and I
20 just wanted to make that be of note. I'll
21 take a rest now, Bill.

22 BILL LAWSON:

23 Thank you, Ms. Klunk. The next
24 speaker is Dr. Richard Clark. Dr. Clark.

25 DR. RICHARD CLARK:

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(continued)

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1 Thank you, Mr. Chairman. I'm
2 speaking this afternoon as the elected
3 spokesperson for S.T.O.P., Stop Targeting
4 Our People, which is a grassroots
5 organization which started up initially to
6 assess this particular project initially
7 and then later on to formally oppose it
8 and that's why I'm here this afternoon.

9 I would, for the record, like to
10 indicate that I will give the Chairman a
11 series of covers, copies of covers from
12 documents. This will be supplemental
13 information that was provided in the
14 reading room. It was provided to me by
15 Todd Platts, Pennsylvania State
16 Representative from the 196th District.
17 And these cover letters have, many of
18 them, a receipt date on the cover. So
19 this is to indicate that some of the
20 reading materials that were supposed to be
21 available to the public were not at the
22 time that they should have been.

23 Secondly, I would indicate Mr.
24 Johnson has given me some replies to
25 questions that have been asked earlier so

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J-45/9

KEYWORDS:

Document availability
NEPA

Response: Please see the responses to Comments D-60/2 and D-59/22. In addition, one of the reasons that an additional public hearing date was scheduled for January 18, 1995, was to provide an opportunity for the public to read any source documents that may have been unavailable in late November 1994 and thus, to provide another opportunity for informed public input at the January hearing.

1 I'm going to include them in my comments
2 but will make the public aware that these
3 comments have been already addressed, they
4 were comments that were made earlier.
5 Before I go into specifics, I would like
6 to recall for the record, again, a comment
7 that I made earlier at another hearing,
8 and it had to do with a phenomena called
9 Clientele Capture. Clientele Capture is a
10 term that evolved after the NEPA became
11 law in 1970. And NEPA, of course,
12 originated the Environmental Protection
13 Agency, a regulatory agency, with regards
14 to the environment. And Clientele Capture
15 refers to regulatory agencies becoming
16 captured by the industry that they are
17 supposed to be regulating. Realizing that
18 the Department of Energy is not primarily
19 a regulatory agency, I feel that you're
20 acting in a regulatory capacity as the
21 agency on the preparation of the
22 Environmental Impact Statement.
23 I found within the Draft
24 Environmental Impact Statement many
25 suggestions that the authors of this

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J-46/5

Response: Comment is noted.

KEYWORDS:
NEPA

1 document had been captured, quote, end
2 quote, by the clients that they are
3 supposed to be, quote, regulating, end
4 quote.

5 I have categorized some of the
6 inculcations of this. And I've
7 categorized what I felt were errors and
8 those errors might be in quotes or it
9 might be dropped depending upon specific
10 situations.

11 I found errors with regard to
12 implications, that is, where false
13 assumptions are made. For example, the
14 cover sheet that a statement that the
15 overall purpose of the proposed project
16 would be to demonstrate the commercial
17 viability of using utility scale CFB
18 technology and a cogeneration facility to
19 generate electric power and steam. Here
20 the assumption is apparently made that the
21 scale-ups of this technology are not
22 commercially viable. And I believe I read
23 it into the record earlier but I want to
24 reiterate it again, and I will provide the
25 DOE with a copy of the document which I

(continued)

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J-47/13

Response: Please refer to the response to Comment D-39/13.

KEYWORDS:

Commercialization
status

1 think leaves this assumption sort of to
2 rest, it's authored by Gaglia, Laskawiec
3 and Misztal and it's dated 1993, and it
4 describes a 230 megawatt scale-up using
5 this particular technology proposed. It
6 indicates that two of them have been sold
7 to Poland by an American company. So
8 these two, both of them are --- both of
9 the boilers are 230 megawatts and I think
10 that falls within the realm of scale-up
11 that we're talking about here with the
12 250. And, of course, there is already in
13 existence and operating a 250 megawatt
14 with this technology that Dr. Wachter has
15 already indicated is on-line.

16 I had also earlier indicated
17 that I felt there was sanitizing going on
18 by the authors of this document where
19 impacts are minimized or suggested as
20 being not significant, et cetera. An
21 example of this would be in page Roman
22 VII, where it states noise impacts
23 associated with vehicles, machinery and
24 purging of the steam systems would be
25 short term in duration. Well, the release

(continued)

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J-48/17

KEYWORDS:

NEPA
Quality

Response: The discussion referenced in the comment is found in the Executive Summary of the EIS. The Executive Summary is a concise statement of the major findings. It is intended to assist the reader in understanding the contents and findings of the document by synthesizing salient issues. Because the Executive Summary is intended to be brief, detailed discussions and analyses are inappropriate. However, it is recognized by DOE that steam system purging can be disruptive and potential mitigation measures to lessen the impact are stated in the Executive Summary. A more complete discussion of the potential impacts of noise- both from construction and operation of the proposed facility - is found in Section 4.1.7 of the EIS.

1 of steams, excess steam might be short in
2 duration, but can have a very dramatic
3 effect, we already hear it quite often
4 from the P.H. Glatfelter Company. And
5 during the middle of the night it's enough
6 to wake you up. We live about
7 three-quarters of a mile and it's enough
8 to wake you up out of a sound sleep.

9 Then I found what I would
10 categorize as judgemental errors, that is,
11 where a judgement is made based on
12 projected information that's not presently
13 available. An example of this would be
14 found on page 4-14 and this has to do with
15 the VOCs, volatile organic compounds. The
16 statement is made that it would not be
17 subjected to the volatile organic compound
18 VOC requirements, that is the Federal
19 government, because its potential to emit
20 VOCs is less than 50 tons per year.

21 Now, it should be noted that the
22 level of load of the generator and the
23 emission rate for VOCs is an inverted
24 relationship. That is, as the operation
25 level of the boiler goes down the VOC

(continued)

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J-49/12

KEYWORDS:

Air emissions
Loading factors
Volatile organic
compounds

Response: The York County Energy Partners, L.P. (YCEP) proposed project is designed as a baseload facility that would operate at full 100 percent load. In the contract between YCEP and Metropolitan Edison Company (Met-Ed), Met-Ed has reserved the right to dispatch the facility down to a minimum of 50 percent electrical load. The contract does not have any specific language on the number of hours per year the facility could be dispatched.

As discussed in Section 4.1.2.3 of the FEIS, the equipment vendor, Foster Wheeler Energy Corporation, has guaranteed to YCEP that when the proposed facility is operated on a unit capacity of 50 percent to 100 percent, the volatile organic compound (VOC) emissions in the flue gas measured in the stack would not exceed 10 lbs/hr based on a 24-hour average (letter from Foster Wheeler Energy Corporation to YCEP, January 2, 1995). For permitting considerations YCEP has chosen to use a 11 lbs/hr maximum VOC emission rate. Thus, regardless of the unit capacity conditions (50 percent, 75 percent, or 100 percent) under which the proposed YCEP facility may be operated, the maximum annual emissions of VOCs would be 48 tons.

1 emission rate goes up. So if you were to
2 operate the boiler at lower rates, for
3 example, 50 percent lower versus 100
4 percent low, the VOC emission rate goes
5 up. And this is reflected on table 4.1-1
6 on page 4-20.

7 If you take a look at the pounds
8 per hour of VOCs, under 50 percent load
9 you see it's 13 and under 100 percent load
10 it's 11. So that the annual production of
11 the VOCs will vary according to the
12 operating load schedule of the --- or
13 operating level schedule of the boiler.

14 Now, further to this, there's a
15 statement on page 2-8, which states,
16 although Met-Ed reserves the right to
17 dispatch the facility down to a minimum of
18 50 percent electrical load, the YCEP
19 facility is being designed as a base load
20 facility which would operate at full load.
21 The power sales contract does not have
22 specific language on the number of hours
23 per year the facility could be dispatched.
24 So to me that's saying that they could
25 operate it in terms of Met-Ed's demand, 50

(continued)

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1 percent loaded for the --- for the
2 complete year.

3 DOE has apparently adopted
4 YCEP's suggestion that the boiler would
5 not operate at 50 percent capacity at
6 least half of the time. If one makes the
7 assumption that that will be the case,
8 then the VOCs produced will be 52.596 tons
9 per year instead of the 48 that has been
10 offered, hence offsets work much better
11 yet. VOC emission control devices should
12 be required.

13 Incidentally, the emission
14 rates, tabled on page 4-20, all appear to
15 be above the stated permit rate of .004
16 pounds per million BTUs. Regardless of
17 what the low level is, they all seem to be
18 above it.

19 And then there are the errors of
20 omission. And here is one case where I
21 have additional information provided today
22 that will go to rectifying that for me,
23 but for the public it doesn't do that.
24 For example, statements are made while
25 supporting evidence has been omitted.

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J-51/13

KEYWORDS:

Air emissions
Loading factors
Volatile organic
compounds

Response: Table 4.1-1, of the FEIS, shows the maximum emission rates of volatile organic compounds (VOCs) at 100 percent, 75 percent, and 50 percent loads to be 11 pounds per hour (lbs/hr). An 11 lbs/hr rate corresponds to 48 tons/yr of VOC emissions. As discussed in Section 4.1.2.1, this emission total is under the 50 tons/yr level that triggers the need for emission reduction credits (ERCs) for a major source—such as the proposed York County Energy Partners, L.P. (YCEP) project—within the Northeast Ozone Transport Region. At a 100 percent load, 0.004 lbs/MMBtu non-methane VOCs would be emitted relative to a firing rate of 2,624 MMBtu per hour shown in Table 4.1-1.

The VOC emission rate of 11 lbs/hr at 75 percent load corresponds to 0.0052 lbs/MMBtu of VOCs, relative to the firing rate of 2,099 MMBtu per hour shown in Table 4.1-1. The VOC emission rate of 11 lbs/hr at 50 percent load corresponds to 0.0070 lbs/MMBtu of VOCs relative to the firing rate of 1,574 MMBtu per hour shown in Table 4.1-1. These two VOC emission rates in terms of lbs/MMBtu are greater than 0.004 lbs/MMBtu. However, the 0.004 lbs/MMBtu rate referred to a 100 percent load and not to 75 percent nor 50 percent loads.

1 And, of course, these statements without
2 the supporting evidence are
3 unsubstantiated. DOE has stated on page
4 1-12, in spite of the power purchase
5 agreement that Met-Ed signed with YCEP,
6 Met-Ed could fall short of its reserve
7 margin requirements during seven of the
8 next 20 years. Quoting from the Electric
9 Power Outlook for Pennsylvania 1993 to
10 2013 Met-Ed's projected summer reserve
11 margin is to fall below its capacity
12 target.

13 When reading the statement
14 questions like what years are those? Are
15 they included --- are these dates, for
16 example, from 1995, when, of course, the
17 plant is not in existence, how far below
18 the summer reserve margin would they fall?
19 And again, do these years include years
20 when the YCEP plant would not yet be on
21 line which I just mentioned?

22 When objective evidence is
23 presented then the reader can draw their
24 own conclusions and they don't have to
25 question the validity of the statement.

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J-52/3

KEYWORDS:

Energy management
Met-Ed
Need for power

Response: The following is a listing of the summer reserve margins for the Metropolitan Edison Company (Met-Ed) system for the period 1998 through 2013. They represent the summer reserve margins that would result on the Met-Ed system without the purchase of 227 megawatts of capacity from the York County Energy Partners, L.P. (YCEP) project. These values were derived from the DOE Headquarters Need for Power analysis attached to this Final EIS in Appendix K.

<u>Year</u>	<u>Reserve Margin (%)</u>
1998	11.5
1999	9.1
2000	7.2
2001	5.3
2002	3.5
2003	0.0
2004	4.2
2005	2.2
2006	6.1
2007	8.7
2008	6.8
2009	10.5
2010	7.0
2011	10.4
2012	13.3
2013	11.4

These values show that the summer reserve margins on the Met-Ed system are projected to fall below the target reserve margin range of between 23.1 percent and 24.4 percent between the years 1998 and 2013.

1 And then there are the errors which I
2 categorize as being too preposterous to
3 classify. For example, on page 2-92,
4 under the no action alternative with the
5 gas fired facility, it's stated that with
6 regard to traffic and transportation, it
7 is assumed that the impacts of
8 transportation and traffic would be
9 similar to those projected for the
10 proposed action. Now, the proposed action
11 is the coal fired plant, et cetera, et
12 cetera. The preposterous nature of that,
13 if one stops to think about it, we're
14 talking about a gas fired facility where
15 the primary --- and this is quoted out of
16 the DEIS, primary fuel for this facility
17 would be natural gases supplied by a
18 single pipeline to the facility. So
19 you're eliminating the rail cars in terms
20 of coal coming in. You're eliminating the
21 rail cars and/or the truck vehicles taking
22 out the coal ash and residue. And anybody
23 that has read the DEIS knows that this is
24 a tremendous quantity in terms of
25 vehicular traffic, it is terrific.

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J-53/3

Response: Please see the response to Comment D-206/9.

KEYWORDS:

Alternatives analysis
Transportation

J-53/16

Response: Comment is noted.

KEYWORDS:

Alternatives analysis
Transportation

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BILL LAWSON:

Excuse me, Dr. Clark, are you near your completion?

DR. RICHARD CLARK:

Yes. I can take a break at this point and come back. Thank you.

BILL LAWSON:

That would be fine. At this time the hearing will take a five minute recess and we'll start again promptly in five minutes. Thank you.

SHORT BREAK TAKEN

BILL LAWSON:

I would like to close recess and restart the hearing, please. Jan Wachter would like to offer a clarifying statement, please.

DR. JAN WACHTER:

With respect to some of the comments that were made, the purpose of a public hearing is not really to address all the issues that are brought to our attention for us to listen to it, but when we can provide some insight or information, if we have time we do provide

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1 it typically off the record. But the
2 transportation issue with respect to
3 effects in chapter two, the gas fired
4 unit, that was wrong, we are in the
5 process of changing that. The VOC issues,
6 we did bring up months ago, it never got
7 translated in terms of the resolution of
8 that situation in the EIS. It will be in
9 the final. And in terms of all the water
10 issues that Mr. Klunk brought up, we will
11 be addressing them in the final, but we
12 are pursuing that in an independent
13 direction, also.

14 JOHANNES SCHELTEMA:

15 What about the fog?

16 DR. JAN WACHTER:

17 The fogging issue we have
18 contracted an air quality expert at a firm
19 to look at how valid the air models were
20 with respect to whether or not there's any
21 additional information that we can to
22 filter into those models as well as
23 looking for existing background data for
24 the site with respect to fogging, icing
25 and things like that. We are addressing

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1 that.

2 JOHANNES SCHELTEMA:

3 Nobody is keeping a record up to
4 now. Are you planning to keep a record of
5 it?

6 BILL LAWSON:

7 Excuse me. But if you're going
8 --- let me ask you to postpone your
9 questions for a little bit until we get
10 some of our speakers. But if you'd like
11 to come back on the record and give those
12 questions into the record, we may or may
13 not be in a position to respond to them.
14 But in general, I mean, we're here to
15 listen and I --- if you would care to ask
16 us afterwards maybe we'll have some
17 insight for you. I know that you're very
18 interested. Ms. Linda Spillman is the
19 next speaker, please.

20 LINDA SPILLMAN:

21 My name is Linda Spillman, I'm a
22 member of the Codorus Creek Monitoring
23 Group. I'm the trainer of students who
24 work for the Codorus Creek Monitoring
25 Group and Chesapeake Bay Foundation. I

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1 have a degree in biology, a degree in
2 chemistry and biochemistry research. I
3 teach research.

4 My first statement refers to the
5 inconsistencies that are in this book. I
6 think you've given quite a slight to the
7 County of York County that you can't even
8 spell the names of the towns in York
9 County correctly. I think if you're going
10 to have something of this magnitude at
11 least the names of the towns could be
12 spelled correctly. And I think they
13 should be corrected. You can find them.

14 Second of all, when research is
15 done and footnotes are given, page numbers
16 and references are made to those, these
17 are not in your documentation. You will
18 put a tremendous burden on people who hope
19 to do research or validate anything that's
20 in here by not referencing correctly in
21 the page numbers. I think that's also a
22 slight for anybody who wanted to make a
23 statement on this.

24 The technological terms are also
25 very confusing. In one place --- and my

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J-57/5

Response: DOE has reviewed the FEIS and corrected any discovered misspellings.

KEYWORDS:

Editorial
Spelling

J-57/14

Response: Please see the response to Comment J-39/1.

KEYWORDS:

Editorial
References

J-57/18

Response: Comment is noted.

KEYWORDS:

Editorial
References

1 major questions that I'm going to get to
2 that still have not been answered, answers
3 in two of my questions that were promised
4 to me, have not been sent to me. In the
5 report one place it references, ion
6 exchange systems for purification of
7 cooling towers. In another place it uses
8 water softening systems. Even your
9 terminologies for purification of the
10 water for the cooling tower is not
11 consistent. In the final documentation
12 they are not consistent.

13 I think you should soon get your
14 terminologies and consistencies together
15 so that if anybody does want to comment on
16 these, to try and find what you're talking
17 about is very, very difficult. I'm going
18 to go back to my original questions that I
19 had presented at one o'clock in the
20 morning at one of the other sites which I
21 still do not have answers to. I asked for
22 a complete list of what the exact
23 chemicals are going to be used in the ion
24 exchange system for the purification of
25 the water to be taken out of the Codorus

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J-58/4

KEYWORDS:

Ion exchange
Water softening
Water treatment

Response: It is not a matter of confused terminologies—two systems would be used. Figure 2.1-7 shows the water balance for the boiler make-up water (not to be confused with "cooling tower make-up" water). Steam produced in the boiler would be recycled, but because small losses occur, water must be added, and the build-up of constituents that could cause scale or corrosion must be controlled. Membrane softening and other forms of demineralization would be used. The specifics of these treatments have not been determined. Except in a discussion of the boiler water treatment system for the proposed project at the West Manchester site, a thorough search of the document did not reveal any other use of the terms "ion exchange" or "water softening" systems. For reasons indicated in the Wastewater Reuse Feasibility Study, the cooling tower make-up, which comes from the P. H. Glatfelter Company's secondary treatment plant effluent, is not softened.

J-58/21

KEYWORDS:

Ion exchange
Precipitates
Water treatment

Response: Specifics of the demineralization system have not been determined. Data on the concentrations of calcium (Ca), magnesium (Mg), and iron (Fe) cations plus the concentrations of sulfate (SO₄), hydrogen carbonate (H₂CO₃), and chloride (Cl) anions in the process make-up water would provide the information necessary to select appropriate equipment. Demineralization (also known as "water softening") is an established science and is routinely utilized to treat boiler make-up water. A back-flush would probably serve to restore the treatment systems (both membrane softener and demineralizer) when these reach capacity. This back-flush would be returned to the cooling water make-up system. As indicated in Figure 2.1-7, most of the boiler blowdown would go to ash wetting, and the excess would flow to P. H. Glatfelter Company's secondary effluent treatment plant (or to the cooling tower make-up water stream). Under normal operating conditions, boiler make-up water would not be taken directly from Codorus Creek; the P. H. Glatfelter Company

1 Creek. I asked what modeling is going to
2 be done, what is the change in the
3 chemical composition and exactly what are
4 the weights of the precipitates that are
5 going to be formed that you are planning
6 to put back into that stream? I have
7 found references to them. I have not been
8 able in any of the research, and maybe
9 because of not looking on or being able to
10 find the page numbers for these chemicals,
11 I've not been able to find any answers to
12 these questions.

13 I mailed a special delivery
14 letter to Dr. Wachter. I had received a
15 reply that I would have an answer to the
16 full scope of the ion exchange system.
17 I've not received any reply to that. I
18 cannot comment or make any criticism for
19 or against the ion exchange system if I
20 don't know what chemicals are going to be
21 used, what their quantities are going to
22 be used, complete precipitant forms and
23 what the chemical composition of these
24 precipitates are going to be when they go
25 back into the stream, if I don't have any

(continued)

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would supply this water from their process stream. It is possible that boiler make-up water would be treated by the P. H. Glatfelter Company in their existing facilities.

As described in Section 4.1.4.2.5, chlorine dioxide (ClO_2), a commercial phosphate polymer, and sulfuric acid (H_2SO_4) would be added to the recirculation water in the cooling tower. No precipitates would form based on the addition of these chemicals to the cooling tower make-up water. Please note that water to be used in the cooling tower is not taken directly from Codorus Creek, but would be effluent from the P. H. Glatfelter Company's treatment facility.

Please see also response to Comment J-58/4.

J-59/13

KEYWORDS:

Ion exchange
Precipitates
Water treatment

Response: During the early stages of the proposed project, York County Energy Partners, L.P. (YCEP) considered additional treatment of the P. H. Glatfelter Company's wastewater prior to use in the cooling tower. These treatment processes could have generated precipitates. However, the results of a wastewater feasibility study, as outlined in Section 4.1.4.2.4 of the EIS, indicated that this additional treatment was not necessary. Thus, the ion exchange system mentioned by the commenter (for the treatment of cooling tower make-up water) is not currently part of the proposed project.

Please see also the responses to Comments J-58/4 and J-58/21.

1 answers to that. Now, if those are in a
2 section that I have been unable to find I
3 will be glad to go back and make a comment
4 on it, but I have not been able to find
5 that anywhere.

6 It is admitted in here that in
7 several places there will be metals,
8 inorganic solids, inorganic ---
9 inorganics, no records as to what they
10 actually are, are going to be removed from
11 the source water for the cooling towers.
12 My question is, what analysis have you
13 done so far as to what these metals are?
14 What are the inorganic solids? What are
15 these organics that you are going to
16 remove? I'm reciting page, by the way,
17 Roman Numeral XI. It's going to be used,
18 go back to the quote, for the cooling
19 towers. The water quality is going to be
20 then improved, continuing on, and then the
21 degrading again will occur. What is this
22 composition of the degrading going to be?
23 What is the exact chemical composition of
24 the materials that are going to be doing
25 this degrading? Yes, we can have up to

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J-60/6

KEYWORDS:

Characterization
Cooling tower
Precipitates
Water treatment

Response: The York County Energy Partners, L.P. (YCEP) proposed treatment program for the cooling tower make-up water (not to be confused with "boiler make-up" water), as described in Sections 2.1.3 and 4.1.4.2.5, involves the addition of chemical conditioners, but does not entail the removal of any metals, particulates, or other impurities from the P. H. Glatfelter Company's secondary effluent. As detailed in Section 4.1.4.2.6, the cooling tower operations would increase the concentration of existing contaminants through evaporative losses. The "blowdown" water from the cooling towers is returned to the P. H. Glatfelter Company's secondary water treatment facility.

J-60/21

KEYWORDS:

Codorus Creek
Consumptive effects
Water quality

Response: The term "degrading" refers to water quality, and, in particular, the increased concentration of wastewater constituents due to evaporative losses for cooling tower operations. During low-flow years, there would be an approximately 10 percent increase of chemical species (such as chloride) in the Codorus Creek (approximately 20 percent increase under extreme low-flow conditions). Section 4.1.4.2.6 and Tables 4.1-27 and 4.1-28 discuss the characteristics of the P. H. Glatfelter Company wastewater effluent.

1 nine percent less water in the creek.
2 Where is the exact list, the chemical
3 composition and the materials that are
4 going to be doing this degrading? Is it
5 somewhere in here? Is it in the reference
6 materials? I can't find it. If it is I
7 would be certainly happy to evaluate it.
8 If it has not been done and this has not
9 been fully implemented and it's a major
10 part of this EIS to have cooling towers
11 and the chemical analysis has not been
12 done, how can you possibly have it was
13 part of this? Do I have time or should I
14 take a break?

15 BILL LAWSON:

16 Go ahead, please.

17 LINDA SPILLMAN:

18 Next part, if these materials
19 are all going to Codorus I think these
20 questions have to be answered. This is a
21 major part of the material that's going to
22 be going through the entire County of
23 York. The City of York it will be flowing
24 through. It's going to go the whole way
25 through the Susquehanna River and it's

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J-61/18

KEYWORDS:

Dilution
Water quality

Response: DOE has throughout the EIS provided information regarding the attenuation of the water consumptive effect from the proposed project on downstream water resources. For instance, the consumptive loss (which translates into concentration increases) attributable to the proposed project downstream at York is 1.7 percent (during a normal year), while upstream at Spring Grove the consumptive loss would be 4.9 percent. The effect on the Susquehanna River and Chesapeake Bay should thus be small due to their larger flows and distances from the proposed project.

1 dilution factor should also be factored
2 into the Chesapeake Bay.

(continued)

3 If you're not going to put all
4 these precipitants into the Codorus Creek
5 is there any possible plan for
6 incineration of them? Is there any
7 possible plan for landfilling them? If
8 you do an analysis of these precipitants
9 where are they all going to go if the
10 quantities get too high and has that been
11 checked into? Let's say they come back to
12 you and say, oh, we found that we do have
13 a problem here, who's going to check on
14 it? Who's going to do it? If it's going
15 to be incinerated it's going to have to be
16 filled into and you would have to have
17 separate plans and supplemental plans for
18 incineration plans either on-site or at
19 the York County incinerator.

20 My next question is who is going
21 to --- who is going to monitor the
22 materials and the flows? We are going to
23 have some drastic changes in the State of
24 Pennsylvania coming up with our DER.
25 They're going to have some drastic

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J-62/3

Response: The proposed project would not generate precipitates/sludges as a result of wastewater treatment.

KEYWORDS:

Incineration
Precipitants
Wastewater treatment

Treatment or disposal of wastewater sludge generated by P. H. Glatfelter Company's own treatment processes is the responsibility of the P. H. Glatfelter Company. These operations are independent of the proposed action (i.e., the operations of P. H. Glatfelter Company's treatment/disposal facility would not change if the proposed project would be approved).

Please see also response to Comment J-60/6.

J-62/7

Response: Please see the responses to Comments D-82/1, J-60/6, and J-62/3. The P. H. Glatfelter Company's National Pollutant Discharge Elimination System (NPDES) permit specifies the maximum permissible concentrations in their effluent discharge to Codorus Creek. As discussed in response to Comment D-82/24, the Pennsylvania Department of Environmental Resources (PADER) is charged with enforcement of NPDES permits. In addition, the incineration of sludge in P. H. Glatfelter's boilers would also need to be approved through PADER (who would likewise be responsible for any enforcement action).

KEYWORDS:

Incineration
Precipitants
Wastewater treatment

J-62/20

Response: Under the Clean Air Act, a permitted stationary source - such as the proposed Cogeneration Facility - is required to monitor its emissions and to submit a quarterly report to the appropriate regulating agency, which in this case would be the Pennsylvania Department of Environmental Resources (PADER). The report submitted must be signed by an officer of the company who certifies that the information is correct. Submission of a fraudulent report could result in civil and criminal penalties including both fines and imprisonment.

KEYWORDS:

Enforcement
Permits

In terms of discharges to Codorus Creek, the monitoring requirements of the National Pollutant Discharge Elimination System (NPDES) permit (in terms of monitoring frequency and species to be analyzed) would be the primary mechanism by which PADER would assess and enforce compliance.

(continued)

1 cutbacks. One of the answers that I've
2 had in one of my questions, yes, this is
3 going to be monitored. My next question
4 is, who's going to do it? Where is the
5 money coming from? Is this going to be a
6 type of monitoring that when it is
7 overbalanced and something has gone
8 overbalance, is it going to be just sent
9 to the DER and said, oh, I'm sorry, we ran
10 over this for a day? Is this going to be
11 industrial monitoring, are we going to
12 have off-site monitoring of the material
13 and the stress that's on the Codorus
14 Creek?

15 Last I'd like to cite a section
16 and in your presentation today and I read
17 it in one of the other reports that you're
18 saying that some of the material coming
19 out of the stack is going to be
20 chloroform, a major part of it. I'm going
21 to section 4-41, the chart on the Draft of
22 the EIS and the emissions rate. You're
23 saying that coming out from the cooling
24 tower, we're not talking about the
25 material that's coming out from the stack

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DOE has no regulatory authority either to pre-empt, direct, oversee, or fund PADER or any other regulatory agency in the discharge of state-level regulatory responsibilities (e.g., under the Clean Air Act and Clean Water Act).

It should be noted that DOE would require the Industrial Participant to generate and implement an Environmental Monitoring Plan (EMP). The primary purpose of this EMP would be to gather environmental data and analyze environmental performance of the proposed facility from a research and development (and not necessarily a regulatory compliance) perspective. However, based on previous EMPs developed for Clean Coal Technology Projects, the EMP typically provides data from which DOE could determine regulatory compliance. If the data shows non-compliance with a regulatory requirement, even though DOE is not liable for ensuring compliance, DOE would investigate the situation by contacting the Industrial Participant and regulatory agencies for discussion and resolution of the deficiency.

1 itself, after the coal is being burned,
2 we're talking about what's coming out of
3 the cooling tower is going to be --- the
4 main one I'm concerned with here is
5 chloroform, I am concerned about the
6 selenium but I have results and
7 information on chloroform, that it's going
8 to be 16.4 milligrams per second, .57 tons
9 per year which equates to more than 1,000
10 pounds per year of chloroform being
11 deposited on the County of York. I think
12 the citizens in West York, East York ---
13 well, West York and South York certainly
14 have and should be concerned about
15 chloroform. You're saying that it has no
16 effect whatsoever. I would think that
17 1,000 pounds per year coming out of a
18 stack in addition to what is coming out of
19 the other stacks is, in fact, a problem,
20 and for that I'm going to cite some things
21 on chloroform, maybe you don't have this
22 information. I also have recent MSD
23 sheets for you. Chloroform inhalation
24 symptoms, and this is symptoms for acute
25 poisoning, irritation to eyes, nose and

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J-64/5

KEYWORDS:
Chloroform
Selenium

Response: Please see the response to Comment J-64/16 for a discussion on chloroform. The health risk assessment for boiler stack and cooling tower emissions (*Environ 1994b,c*) evaluated risks from a number of substances, including selenium. The results of the health risk assessments indicate that metals in general (including selenium) would not pose unacceptable health risks. Please see Section 4.1.2.11 and Table 4.1-23 in the EIS for a discussion of health risks due to selenium and other metals.

J-64/16

KEYWORDS:
Air emissions
Chloroform
Health effects
Modeling

Response: Material Safety Data Sheets (MSDS) are primarily designed to protect workers from occupational exposures to potentially hazardous substances. The maximum expected ground-level air concentration of chloroform from the proposed project is many times lower than any regulated occupational exposure [approximately 16,000 times lower than the Threshold Limit Value (TLV) recommended by the American Congress of Government Industrial Hygienists (ACGIH) and approximately 80,000 times lower than the Occupational Safety and Health Administration (OSHA) permissible exposure limit (PEL)]. It should be noted that these levels are based on 8-hr, rather than continuous, exposures. Nevertheless, the extremely low ground-level concentrations when compared to TLV and PEL levels suggest that no adverse effects due to acute or chronic toxicity from chloroform would be expected.

1 throat. I think this should be important
2 for the American Lung Association and
3 anyone who has asthma, you're putting
4 another 1,000 pounds of chloroform in the
5 air. It can cause increased headaches.
6 It can cause loss of equilibrium, severe
7 cases possibly close to the plant, can
8 cause loss of consciousness, narcosis and
9 if severe enough state of shock. If it is
10 ingested, in other words, if this material
11 is deposited on food crops that are going
12 to possibly be ingested by York Countians,
13 acute poisoning, irritation to lips, skin,
14 mouth, gastrointestinal irritation, can
15 lead to nausea and vomiting, drowsiness
16 and severe narcosis. If the chloroform
17 comes in contact with the skin which may
18 not seem bad to anybody but it would be
19 with somebody with severe allergies, it
20 can lead to very dry skin, inflammation
21 and blisters that later become painful,
22 but it is a cumulative effect. You're
23 planning to add 1,000 pounds of chloroform
24 to the air in addition to everything else.
25 Has that been in your computer modeling?

(continued)

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Because chloroform is a suspected human carcinogen, the lifetime risk to human health from exposure to chloroform was assessed in a separate human health risk assessment for expected emissions from the cooling tower. In assessing risks due to inhalation of a suspect carcinogen such as chloroform, accepted methodology uses a factor called the Inhalation Unit Risk, which is the carcinogenic toxicity of a substance expressed in terms of risk per unit concentration [1 microgram per cubic meter ($1 \mu\text{g}/\text{m}^3$)] of the substance in air. The Inhalation Unit Risk for chloroform is 2.3×10^{-5} (*Environ*, 1994c). In other words, the lifetime risk from the daily exposure to an air concentration of $1 \mu\text{g}/\text{m}^3$ of chloroform would be slightly greater than 2 in 100,000. Emissions of chloroform from the cooling tower are expected to be approximately 520 kg/yr ($\sim 1,100$ lbs/yr). Based on dispersion modeling results, the maximum expected ground-level air concentration of chloroform from the cooling tower emissions is expected to be approximately $3 \times 10^{-3} \mu\text{g}/\text{m}^3$. The expected excess lifetime cancer risk from a daily exposure to this concentration of chloroform would be less than 1 in 10 million. This is below the presumed-safe level used by the EPA to assess risk.

1 Have you done the severe testing on this?
2 And last I'd like to go to the
3 latest MSDS sheet that I could find on it
4 and it says, and any exposure to
5 chloroform it may cause headaches and
6 dizziness that can be harmful. It will be
7 causing irritation to the eyes and it's
8 now listed as a suspected carcinogen. It
9 is an irritant to body tissues and finally
10 not only all of the health aspects of the
11 substance that have been fully
12 investigated, but it is under full
13 investigation. You need full
14 investigation of this chemical, I believe,
15 and much better modeling before you can
16 say that this chloroform is going to have
17 no impact on the citizens of York County.
18 I'm finished.

(continued)

19 BILL LAWSON:
20 Thank you. Mr. Robert Wetzel.
21 ROBERT WETZEL:
22 Yes, to the Board here I have
23 some questions to ask, if it is possible
24 to do this or would this be a statement
25 ---?

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BILL LAWSON:

Well, if you would --- what we would like for you to do is state your name so that we can have it correctly for the record and any affiliation that you have and then your statement or questions, whatever you want to say or for the record. Anything that you say here will be addressed in the final Environmental Impact Statement so you may or may not be in any position to address specific questions that you might have here but they will be addressed in the final Environmental Impact Statement, that's the purpose of your testimony, sir.

ROBERT WETZEL:

Thank you. I'm Robert M. Wetzel, I live at 455 Hanover Road, York, PA. I live about within three to four air mile of this proposed site. I'm a resident of West Manchester Township. I have a couple of questions to ask about this cogeneration plan. First of all, who will benefit by it? You know, who is going to be --- cogeneration means that

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J-67/23

KEYWORDS:

Cogeneration
Need for project

Response: The definition of cogeneration is the production of both electricity and steam at one facility from the same primary fuel source. The proposed boiler would be used to replace P. H. Glatfelter Company's Power Boiler No. 4 that produces steam for use in P. H. Glatfelter Company's paper mill processes. Steam would first be used to produce electricity and would then be purchased by P. H. Glatfelter Company for process use.

1 there's two sources, you have a primary
2 source and a secondary, if I'm right about
3 cogeneration in my understanding.

4 My first source is I understand
5 that power will be generated. This grant
6 is supposed to be given for clean coal
7 burning to the people. It's supposed to
8 be coming from the government and going to
9 a private business. So I think first of
10 all, this is going to benefit a private
11 business, Air Products. Now, here we're
12 giving welfare or a loan, which is a
13 grant, which is not paid back money of 75
14 million in order to construct the plant.
15 I don't know whether this is taken into
16 consideration when you review our
17 Constitution of the United States.

18 Secondly, the second person
19 which will benefit from this will be the
20 P.H. Glatfelter Paper Mill, if I
21 understand this right because they'll be
22 buying the coproduct, the steam which is
23 made --- the first issue now presents
24 another thing that a private business is
25 going to force a regulated State utility

(continued)

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Different entities would benefit from the plant being built, as discussed in Sections 1.3 and 4.1, "Purpose and Need" and "Environmental Impacts of the Proposed Action," in the EIS. Principal beneficiaries would include York County Energy Partners, L.P. (YCEP) and local citizens due to improved air quality from the curtailment of the P. H. Glatfelter Company's Power Boiler No. 4. The project is also predicted to provide a limited boost to the local York economy due to increased jobs from construction and operation of the facility. The EIS has attempted to examine all the expected consequences of the project, both good and bad. The main beneficiary of interest to the DOE is the United States citizen. DOE's purpose for funding this project is to promote the use of United States coal for economic, security, and environmental reasons which are discussed in Section 1.3 of the EIS. Due to the age of existing power plants and new demands for power, it is estimated that there will be a major investment in new power plants by the mid-1990s. Developing and demonstrating new technologies under the Clean Coal Technology (CCT) program will allow these technologies to be chosen over existing technologies, resulting in decreased emissions and higher efficiencies. DOE has found partnering with industry to be very effective in lowering research and demonstration costs and increasing technology transfer.

1 to buy their primary product. So I don't
2 see, unless there's a need that's been
3 typically shown by the regulatory company
4 of Met-Ed that they request this, that
5 they put this plan in. I think we're
6 looking at the wrong thing.

7 Thirdly, I think that we put Air
8 Products, they're often --- they're
9 working with a big conflict of interest
10 here and one of the biggest things is Air
11 Products developed through making gases,
12 you know, for the air, use of the air.
13 And one of the things that they've been a
14 long term maker of has been oxygen which
15 is used for medical purposes. This is one
16 of the biggest things that I don't
17 understand why if they're making medical
18 oxygen for people like myself, I've had a
19 heart attack in '87, had a second one in
20 '93, so I do have some heart problems and
21 I'm definitely interested in speaking on
22 this. I would like to know why they would
23 want to get into a business producing
24 electricity, burning coal, which is
25 supposed to be a cleaner, which yet is

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J-69/1

Response: Please see the response to Comment D-83/5.

KEYWORDS:

Met-Ed

Need for power

J-69/16

Response: Air Products is a manufacturer of various products. The production of gases and chemicals involves a lot of the same equipment used in power plants (fans, heat exchangers, pumps, etc.) and also requires heat and steam sources. The two fields are not entirely removed from one another. The fact that Air Products manufactures oxygen for medical purposes is not a factor in whether or not this project would be built. As for burning coal, well over half of the power generated in the United States today is generated by burning coal.

KEYWORDS:

General

Medical oxygen

Please see also the response to Comment D-93/9.

1 still putting a lot more pollutants into
2 the air for the people to have to breathe.
3 Now, if this is the way that we
4 can drum up more business, this is kind of
5 the back door approach, for us to grant 75
6 million from the United States Government,
7 which is government of the people, for a
8 private business. So I am at this point
9 registering a complaint that I don't feel
10 this is fair and I think that we should
11 also take the simple terms of the
12 Constitution of the United States that
13 provides for the protection of the people.
14 Thank you.

15 BILL LAWSON:

16 Thank you, Mr. Wetzel. I think
17 you've given us a little different
18 perspective than we quite had on this
19 issue. Mr. Marty Reed is the next
20 speaker.

21 MARTIN REED:

22 My name is Martin Reed, a
23 resident of North Codorus Township. I
24 live less than a mile from P.H.
25 Glatfelter. I wanted to speak a few

(continued)

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J-70/8

Response: Comment is noted.

KEYWORDS:

General

1 minutes about the fogging and icing
2 situation. I think the first speaker
3 talked somewhat about it so I'll try to
4 keep it minimal and not be repetitive. On
5 3-14 in the statement you indicate there
6 was no documented fogging at the current
7 P.H. Glatfelter facility or icing. I take
8 exception to that, as a resident numerous
9 times over the last four and a half years
10 that I've lived at this particular
11 residence and driven through Spring Grove,
12 typically as I recall early in the a.m.,
13 which coincides with the peak traffic
14 hours, generally at a time when there's a
15 lot of humidity in the air and it turned
16 sharply colder, it seems like this fog is
17 more prevalent. I don't have any
18 particular documentation, although it's my
19 understanding that there were specific
20 photographs provided to you folks last
21 March and they were to document two
22 particular weekends of this condition.

23 There was one particular
24 incident in relationship to icing however,
25 that I experienced and I kept a ledger and

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J-71/4

Response: Please see the responses to Comments D-62/8 and D-104/9.

KEYWORDS:

Baseline
Documentation
Fog

1 I looked back it was January the 28th of
2 '94, late on a Friday night, and I will
3 note that there were icy conditions
4 throughout York County, so I'm not taking
5 away from that. But late that evening I
6 was on my way home and I traveled Route
7 116, I have to go through Spring Grove to
8 get to my home and at the north end of
9 town at the junction of Menges Mill Road
10 there was a barricade and all traffic was
11 diverted on Menges Mills but to get to my
12 home I had to go the other way, so I went
13 for anyone that's familiar with Spring
14 Grove, I went down to the high school and
15 made a left-hand turn and went over to
16 Main Street and by the mill and as I
17 crossed the bridge, Codorus Creek at the
18 mill, there was a flagman there stopping
19 the traffic and before me were just cars
20 and trucks all over the road and he said
21 you'll have to stop and wait.

22 And I said, well, I have to
23 drive home. He said, well, you'll have to
24 walk. And I said, well, I'm going to take
25 a chance on it, I have a four-wheel drive.

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1 The irony of this I guess you'd say is
2 when I turned onto Lehman Road to go up to
3 my home the further up the hill I got the
4 easier the going became. So my point is,
5 even though it was icy throughout the
6 county the condition was obviously worse
7 right in the immediate vicinity of Kessler
8 Pond. So when you take this into
9 consideration for what it's worth and plot
10 that against the proposed facility
11 evaporating I think about three times the
12 amount of water into the atmosphere one
13 has to question what would the fogging and
14 icing conditions be at that point. And
15 only one other note on 3-14, under the
16 current conditions, I don't quite
17 understand why reference is made to
18 conditions as whether it exists over time
19 in Harrisburg and Philadelphia, I don't
20 understand what the point is. The point
21 is this particular site in Spring Grove
22 and the effects of an artificial
23 condition, not natural mother nature.
24 Thank you.

25 BILL LAWSON:

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J-73/1

Response: Please see the response to Comment D-62/8.

KEYWORDS:

Baseline
Documentation
Fog and ice

J-73/14

Response: Please see the response to Comment D-155/11.

KEYWORDS:

Fog
Meteorology

1 Thank you, Mr. Reed. The next
2 speaker registered is Mr. Harry Smith.
3 Mr. Smith.

4 HARRY SMITH:

5 Good afternoon. I'm Harry
6 Smith, Dover Township and I'd like to
7 speak a little bit about some information
8 I have concerning turbines, which were
9 mentioned in your book. I would like to
10 start off by saying that I made a study
11 here on a World Book Encyclopedia and
12 found a disturbing recent development, in
13 the second paragraph of that book. It
14 states in there that the engineers have
15 designed and built steam turbines capable
16 of using steam at pressures of more than
17 4,500 to 5,000 pounds per square inch,
18 which is 315 to 350 kilograms per square
19 centimeter. Such high pressure steam can
20 enable a turbine to produce more power
21 with less fuel. In 1957 the American Gas
22 and Electric Company installed a turbine
23 at its Ohio plant that uses steam at a
24 pressure of 4,500 pounds per square inch,
25 360 kilograms per square centimeter and

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1 the temperature of 1,150 Fahrenheit which
2 is 621 degrees centigrade. This station
3 can produce a kilowatt hour of electricity
4 from only about three-quarters of a pound
5 or three kilogram a pole.

6 Your YCEP cogeneration facility
7 book, page 2-8 projects, I think it says
8 project 2.13, that's a paragraph in the
9 book, that states here, I took it out of
10 context, I think, steam turbines produced
11 electricity for sale to Met-Ed, up to
12 400,000 pounds per hour of high pressure
13 steam at, and then they have sort of a
14 bracket, I don't know what that
15 represents, a pressure of 4,136,854
16 newtons per square meter, pascal, and I
17 don't know what that represents either,
18 but in parenthesis they say 600 pounds per
19 square inch and a temperature of 346
20 degrees Celsius or 680 degrees Fahrenheit
21 exiting the steam turbine would be sold to
22 the P.H. Glatfelter Company for use in
23 their paper mill operations.

24 Now, here is briefly what I'm
25 trying to say, the plant in Ohio, YCEP,

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J-75/10

KEYWORDS:

Operating conditions
Turbines

Response: The numbers in question represent pressure and temperature of the steam in English (pounds per square inch, Fahrenheit) and International System units (newtons per square meter, Pascal, Celsius). These numbers are provided to supply information about the characteristics of the steam being supplied. Incidentally, the equivalent temperature in Celsius is 360 degrees, not 346 degrees. This mistake has been corrected in the FEIS.

The condition of the steam sent to the P. H. Glatfelter Company's papermaking process is at lower conditions (temperature and pressure) than what is used to generate the electricity at the proposed facility. The steam conditions proposed for this project represent the current state of the art for power generation.

1 I'll say supplied York County Energy
2 Partners --- Ohio plant produces 4,500
3 pounds per square inch of steam pressure
4 where York Energy Partners only produces
5 600 pounds per square inch for steam
6 pressure. The Ohio plant is producing
7 almost eight times per square inch more
8 pressure than the York County Energy
9 Department plant. We, the Ohio plant, the
10 steam pressure is at 1,150 pounds ---
11 1,000 --- excuse me, 1,150 degrees
12 Fahrenheit where the York Energy Partners
13 steam temperature will be 600 degrees
14 Fahrenheit. Ohio's plant steam is almost
15 twice as high in the temperature as the
16 York Energy County Partners.

17 By putting steam in a high
18 pressure and temperature, at a higher
19 temperature, the turbine was being --- I'm
20 sorry. The turbine was spun at a higher
21 speed putting out larger amounts of
22 electricity and by running that steam
23 through a condenser the water will be at a
24 better recycling temperature at 100
25 degrees Fahrenheit. The whole consumption

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J-76/14

KEYWORDS:

Operating conditions
Turbines

Response: The steam pressure and temperature being compared here for the York County Energy Partners, L.P. (YCEP) boiler [680 degrees Fahrenheit and 600 pounds per square inch (psi)] are the pressure and temperature **after** the steam has gone through the high-pressure turbine and part of the intermediate-pressure turbine. Much of the "steam energy" has already been removed to be transformed into electricity at this point.

The pressure and temperature of a turbine with the characteristics mentioned (4500 psi, 1150 degrees Fahrenheit) would be operating in the supercritical range. Above 3208 psi (the critical pressure, hence the term supercritical), water does not boil. A supercritical boiler represents an entirely different type of technology than the one which has been proposed by YCEP. Supercritical units employ a once-through system for the heat transfer media; that is, the feedwater introduced into the unit is not recirculated and no steam drum (used in subcritical units for separation of water and steam) is necessary. Supercritical pressure plants are used throughout the world, have been operating in the United States since 1959, and are among the most efficient steam plants; however, these units can also have problems associated with start-up, water quality, and uneven heating. Since supercriticals are once-through units, water impurities cannot be removed by blowdown. Feedwater must be treated to much greater purity than is required for subcritical units to avoid deposits which would damage the boiler and/or turbine.

The temperature and pressure ranges proposed by YCEP are reasonable and consistent with those for a cogeneration facility. In a cogeneration facility, steam flow for an industrial process is generally taken from the turbine exhaust or one of the lower pressure turbine extraction stages to utilize the heat which would otherwise be lost when the steam is condensed and recycled back into the system. Cogeneration facilities are designed to operate at pressures which will yield the desired industrial steam pressure at the point from which the industrial steam is taken so as to take advantage of this "waste heat." A supercritical boiler would be a prohibitively expensive option for use with waste heat, due to the large pressure differential. A supercritical steam cycle has not been demonstrated using fluidized bed technology, and therefore, could not be funded under this proposal.

The commenter compares the tons of coal being burned per day by the YCEP boiler with those in a boiler in Ohio. There appears to be some confusion between the efficiency and the output or capacity of a boiler or turbine. A boiler or a turbine may be very efficient and have either a small output or a large output. Similarly, a boiler or turbine may have a low efficiency and still have a large output.

1 would be, at this Ohio plant, if I read
2 this correctly, 43.2 tons per 24 hours, if
3 my calculations are correct. The maximum
4 YCEP or York County Energy Partners,
5 tonnage is 2,500 tons per day, and that's
6 on page 2-9. I'm wondering what in the
7 world are they trying to do? Once steam
8 turbine is generated it can supply all
9 electricity used by about three million
10 people and this is in Ohio.

11 I'd like to just digress here a
12 little bit, just to make a little bit of a
13 comparison here, that Curtiss (phonetic),
14 according to this book, invented the
15 turbine about 1900. The first turbine was
16 built in 1903. The information in the
17 encyclopedia on the 1903 turbine is almost
18 in line with the York County Energy
19 Partners' data. Thank you.

20 BILL LAWSON:

21 Thank you, Mr. Smith. Ms.
22 Connie Schmotzer, is that correct? Good
23 afternoon.

24 CONNIE SCHMOTZER:

25 Good afternoon. My name is

(continued)

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Cycle efficiencies for supercritical pressure plants can exceed 40 percent. The proposed YCEP circulating fluidized bed (CFB) combustor is expected to be approximately 37 percent efficient. The proposed CFB efficiency is significantly higher than the class of boiler it would replace (which typically operates below 30 percent efficiency) in terms of steam generation (P. H. Glatfelter Company's Power Boiler No. 4).

Please see also the response to Comment D-37/16, which discusses issues related to consideration of alternative technologies.

J-77/15

Response: Comment is noted.

KEYWORDS:

General

1 Connie Schmotzer, I live at Schoolhouse
2 Lane, East York Springettsbury Township.
3 Ladies and gentlemen, I'm with the DOE.
4 This afternoon I'd like to speak to two of
5 the areas of concern that I had in my
6 reading of the Environmental Impact
7 Statement. And both of these concern the
8 emissions of Volatile Organic Compounds or
9 VOCs. My first concern is that the Impact
10 Statement does not adequately address the
11 emissions of VOCs. Accurate figures of
12 this pollutant are particularly important
13 to York County and to our surrounding
14 region because it is a principle precursor
15 of ozone for which we are as you know a
16 marginal attainment area.

17 As I have followed this project
18 over the last few years the emission
19 figures for VOCs have varied erratically
20 without any real concrete explanation. In
21 the original project proposal plan it was
22 stated that and I quote, since the VOC
23 emissions from the facility will be
24 greater than 50 tons per year some VOC
25 offsets will be required to comply with

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J-78/9

KEYWORDS:

Air emissions
Ozone
VOCs

Response: Volatile organic compound (VOC) emissions are addressed in the FEIS (see Sections 2.1.3, 2.2.3, 4.1.2.1, 4.1.2.2, 4.1.2.3, 4.1.2.4, 4.1.2.6.5, 4.1.2.7, 4.1.2.9, 4.1.2.11, and 4.2.2). As discussed in Section 4.1.2.3, the maximum potential VOC emissions from the proposed circulating fluidized bed (CFB) facility would be 48 tons/yr. The proposed York County Energy Partners, L.P. (YCEP) project lies within the Northeast Ozone Transport Region. The expected VOC emission rate is below the threshold of 50 tons/yr established for a major source within the Northeast Ozone Transport Region, and therefore the proposed YCEP project would not need to provide emission reduction credits for VOCs.

The maximum VOC emissions from the proposed YCEP facility would be 48 tons/yr (see Table 4.1.3 in Section 4.1.2.5). As a result of the curtailment of the P. H. Glatfelter Power Boiler No. 4, 3.4 tons/yr of VOC emissions would no longer be emitted (see Table 4.1-3 in Section 4.1.2.5). Up to 1.0 ton/yr of VOC emissions would be expected from additional traffic (see Table 4.1-14 in Section 4.1.2.10), and 0.57 tons/yr of chloroform would be emitted from the proposed cooling tower (see Section 4.1.2.9). Thus, a maximum increase of about 46.2 tons/yr of VOCs would be expected from all sources. A regional reduction in oxides of nitrogen (NO_x) due to emission reduction credits (ERCs) was not added to nor included in this ozone (O_3) estimation. It has been estimated that an increase of 50 tons/yr of VOC emissions could result in a maximum formation of 0.4 parts per billion (ppb) ozone (O_3) [approximately $0.8 \mu\text{g}/\text{m}^3$ ozone (O_3) at standard conditions]. A value of 0.4 ppb ozone (O_3) should be viewed in relation to the following typical ozone (O_3) levels in the York Air Basin reported by PADER: an annual average of approximately 53 ppb ozone (O_3), a daily maximum average of approximately 112 ppb ozone (O_3), and a maximum background level of approximately 350 ppb ozone (O_3) during one year.

It is important to note that under EPA guidelines, the Pennsylvania Department of Environmental Resources (PADER) has not considered secondary VOC emission levels as a component for major stationary source permitting purposes of VOCs that would be estimated to result from the proposed YCEP project. Secondary emissions are emissions which would occur as a result of the operation of a major source, but which do not come from the source itself. Secondary emissions do not count in determining the potential to emit, i.e., the maximum capacity of a **stationary** source to emit a pollutant under its physical and operational design. In addition, secondary emissions do not include any emissions such as hydrocarbons that come from the tailpipe of a vehicle.

(continued)

1 the ozone non-attainment.
2 When the project was first
3 presented in the Citizen's --- to the
4 Citizen's Advisory Committee in West
5 Manchester, the figures I received for the
6 emissions total had fallen to 26.3 tons
7 per year. This figure was corrected to
8 read 96.3 tons per year, which is
9 consistent with the earlier estimate in
10 the project proposal for the final report
11 of CAC is penciled in as a last minute
12 addition.
13 The 26.3 ton per year figure
14 followed the project to North Codorus
15 Township. And now when I was reading
16 through the Draft EIS, Air Products is
17 estimating emissions to be 48 tons per
18 year, which is rather conveniently two
19 tons per year below the required offset
20 level. The increase in the amount of coal
21 burned does not account for this new
22 figure. If there are valid engineering
23 changes that have occurred or some sort of
24 data that support this wide variability of
25 VOC emissions and that is followed in this

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J-78/17

KEYWORDS:

Air emissions
Documentation
VOCs

Response: The estimates of volatile organic compound (VOC) emission levels for the York County Energy Partners, L.P. (YCEP) project have been consistently documented. For the West Manchester Township site, the equipment vendor, Foster Wheeler Energy, had originally estimated the VOC emissions rate to be 0.01 lbs/MMBtu. Based on boiler firing duty of 2,214 MMBtu/hr for the West Manchester Township project, the VOC emission rate would be 22 lbs/hr or 96.3 tons/yr. This emission level was based on the burning of typical eastern bituminous coal. This VOC emission level was documented to the West Manchester Township Citizen's Advisory Committee during the spring/summer of 1992 and included in their final report. This VOC emission rate was also included in the Draft Information Volume (EIV) for the West Manchester project (see Table 7.1-1, page 7-3 of the EIV). This draft EIV was submitted to DOE in August 1992. The value of 26.3 tons/yr referenced in the comment was not generated by YCEP, and--other than the comment--its origin is unknown to DOE. Subsequently, YCEP provided revised information to DOE stating that the VOC emissions rate from the proposed facility at the West Manchester site would be 39 tons/yr based on the extrapolation of more recent emissions factor data used at the proposed project to the North Codorus Township site.

Table 4.1-1 in Section 4.1.2.3 of the FEIS, shows that at a 100 percent load, the proposed YCEP project is estimated to emit 11 lb/hr of VOCs. This is based on a maximum VOC emission rate at a 100-percent load of 0.004 lbs/MMBtu, a firing duty of 2,624 MMBtu/hour, the burning of 2,500 tons per day, and a heat value of approximately 13,000 Btu/lb. The maximum emissions rate of VOCs is 48 tons/yr. As described in Section 4.1.2.3, the expected emission rate is below the threshold of 50 tons/yr established for a major source within the Northeast Ozone Transport Region, and therefore the proposed YCEP project would not need to provide emission reduction credits for VOCs.

1 project, they do need to be addressed. I
2 think an explanation is definitely in
3 order.

4 I would also suggest that the
5 EIS must address the total VOCs emitted
6 from the plant. The draft mentions one
7 ton per year from the increased traffic in
8 the area. There will also be significant
9 emissions from the cooling towers. Since
10 the wastewater will be coming from the Air
11 Products plant and since this plant will
12 be increasing the total tonnage of VOCs in
13 our air, shouldn't the sum total of
14 emissions be considered in the EIS and not
15 just from the stacks?

16 My second problem with the
17 statement dealt with section 4.1.2.10 and
18 this deals with the effects of the project
19 on vegetation. Here the EIS includes most
20 of the major pollutants but omits entirely
21 the discussion of VOCs. Nitrogen oxides
22 are discussed because of their role in
23 ozone production and therefore possible
24 plant and crop damage that might result.
25 VOCs however are the other principle

(continued)

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J-80/4

KEYWORDS:

Air emissions
Secondary emissions
VOCs

Response: The emissions from increased traffic and from the proposed cooling tower are considered in the EIS. Table 4.1-14 in Section 4.1.2.10 shows that 1.0 ton/yr of hydrocarbons could be expected from additional traffic. Section 4.1.2.9 demonstrates that up to 0.57 ton/yr of chloroform could be emitted from the proposed cooling tower. Section 4.1.2.11 analyzes the effects of these chloroform emissions. The Pennsylvania Department of Environmental Resources (PADER), per EPA guidelines, has not considered secondary volatile organic compound (VOC) emission levels as a component for major stationary source permitting purposes of the 48 tons/yr of VOCs (permit maximums) that the proposed York County Energy Partners, L.P. (YCEP) project could potentially emit. Secondary emissions are emissions which would occur as a result of the operation of a major source, but do not come from the source itself. Secondary emissions do not count in determining the potential to emit, i.e., the maximum capacity of a **stationary** source to emit a pollutant under its physical and operational design. In addition, secondary emissions do not include any emissions such as hydrocarbons that come from the tailpipe of a vehicle.

J-80/16

KEYWORDS:

Air emissions
Vegetation
VOCs

Response: The discussions in Section 4.1.2.10 focused on the air pollutants associated with a coal-fired generation facility that are most likely to cause damage to vegetation. Sulfur dioxide (SO₂) would be most likely to cause damage to vegetation, and 2,602 tons/yr of sulfur dioxide (SO₂) are estimated to be emitted from the proposed York County Energy Partners, L.P. (YCEP) project (see Table 4.1-2a). Emissions of sulfur dioxide (SO₂) from the proposed facility were not believed to present a potential adverse impact to vegetation. Emissions of particulate matter less than 10 microns in diameter (PM₁₀) are less likely than sulfur dioxide (SO₂) to cause adverse effects. Their potential to cause adverse impacts to vegetation was discussed. Likewise, the impacts of oxides of nitrogen (NO_x), carbon monoxide (CO), and hydrogen fluorides (HF) emissions from the proposed YCEP project were discussed.

The impacts of VOC emissions are now also discussed in the FEIS (Section 4.1.2.10). The expected concentrations of all of these species would be below the levels at which an adverse impact to vegetation could be expected.

1 component of ozone. If VOC emissions of
2 50 ton per year are significant enough to
3 require offsets by law, then certainly the
4 increase VOCs caused by this project
5 should be included in this discussion of
6 plant damage.

7 In the analysis of NOx on page
8 4-50, the draft states: And I'm quoting
9 again, since there would be at least a 15
10 percent decrease in oxides of Nitrogen and
11 given that this pollutant is the principle
12 precursor to ozone formation, then one
13 could extrapolate that an increase in
14 ozone levels due to the proposed project
15 would be very unlikely. This statement is
16 not necessarily true. For one, it does
17 not take into account the increase in VOC
18 emissions caused by this project. And the
19 Office of Technology Assessment has stated
20 that control of VOCs has been the backbone
21 of our national ozone control strategy, so
22 by the emission of VOCs this is very
23 evident. Secondly, the nature of the
24 formation of ozone is very complicated and
25 not that easily predicted. It would seem

(continued)

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J-81/7

KEYWORDS:

Air emissions
Oxides of nitrogen
Ozone
VOCs

Response: The tropospheric formation of ozone (O₃) is complex. In summary, scientific opinion based on a history of detailed research and observations indicates that in the northern hemisphere--where a large amount of anthropogenic emissions occur--the major source of tropospheric ozone (O₃) arises from photochemical reactions between oxides of nitrogen (NO_x), non-methane volatile organic compounds (VOCs), and carbon monoxide (CO). [Stratospheric injection of ozone (O₃) is believed to be less important.] In Section 4.1.2.10 of the DEIS, it states "Since there would be at least a 15 percent decrease in oxides of nitrogen (NO_x) loadings to the atmosphere, and given that this pollutant is a (emphasis added) principle [*sic*] precursor to ozone (O₃) formation, then one could extrapolate that an increase in ozone (O₃) levels due to the proposed project would be very unlikely." The interpretation could be made from the comment that oxides of nitrogen (NO_x) are the only really important precursor to ozone formation. However, as stated in the EIS, the meaning remains clear, i.e., oxides of nitrogen (NO_x) are one of a group of principal precursors to ozone formation.

The maximum VOC emissions from the proposed York County Energy Partners, L.P. (YCEP) facility would be 48 tons/yr (see Table 4.1.3 in Section 4.1.2.5). As a result of the curtailment of the P. H. Glatfelter Company's Power Boiler No. 4, 3.4 tons/yr of VOC emissions would no longer be emitted (see Table 4.1-2a in Section 4.1.2.5). Up to 1.0 ton/yr of VOC emissions could be expected from additional traffic (see Table 4.1-14 in Section 4.1.2.10), and 0.57 tons/yr of chloroform could be emitted from the proposed cooling tower (see Section 4.1.2.9). Thus, a maximum increase of about 46.2 tons/yr of VOCs may be expected from all sources. A regional reduction in oxides of nitrogen (NO_x) due to Emission Reduction Credits (ERCs) was not added to nor included in this ozone (O₃) estimation. It has been estimated that an increase of 50 tons/yr of VOC emissions could result in a maximum formation of 0.4 parts per billion (ppb) ozone (O₃) (approximately 0.8 μg/m³ ozone (O₃) at standard conditions). A value of 0.4 ppb ozone (O₃) needs to be viewed in relation to the following typical ozone (O₃) levels in the York Air Basin reported by the Pennsylvania Department of Environmental

1 that if NOx were decreased then ozone
2 levels would not be increased, but such is
3 not always the case.

4 The U.S. Office of Technology
5 Assessment speaks to this in its document
6 Catching Our Breath: Next Steps for
7 Reducing Urban Ozone. It cites an EPA
8 model study of ozone formation and
9 transport throughout the Northeast over a
10 two-week period. The study showed that
11 cutting out the nitrous oxides by
12 one-third and VOCs by 50 percent resulted
13 in modest ozone benefits for most
14 non-attainment areas -- excuse me,
15 non-attainment cities compared to where
16 VOCs alone have been controlled. However,
17 in some areas decreasing nitrogen oxides
18 actually increased ozone. The study
19 indicated that further regional and city
20 modeling needed to be done in order to
21 predict how ozone can be controlled in a
22 specific area because it acts very
23 differently depending on the area that
24 you're studying. To my knowledge no such
25 study has been done for the York region.

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Resources (PADER): An annual average of approximately 53 ppb ozone (O₃), a daily maximum average of approximately 112 ppb ozone (O₃), and a maximum level of approximately 350 ppb ozone (O₃) during one year. DOE has determined that an appreciable increase in ozone (O₃) levels due to the proposed project would be very unlikely.

J-82/4

Response: Comment is noted.

KEYWORDS:

Ozone

1 Our region also faces an
2 increased problem with ozone from
3 automobile emissions because of recent
4 unfortunate legislation from our State
5 House. This forces us to take a closer
6 look at the VOC emissions from point
7 sources and consider their harm to our
8 environment.

9 I have to conclude that the EIS
10 has not thoroughly considered all of the
11 data on this subject, hasn't considered
12 modeling that needs to still take place.
13 And that the statement on page 6-11 that
14 the cumulative effects may be viewed, of
15 the project --- may be viewed as benign if
16 not beneficial is premature. I ask that
17 you please address these points and
18 continue your review. Thank you.

19 BILL LAWSON:

20 Thank you very much. We are
21 going to take a recess here for a couple
22 minutes so you can get some administrative
23 details taken care of.

24 SHORT BREAK TAKEN

25 ROY FIGUREN:

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J-83/9

KEYWORDS:

Air emissions
Cumulative effects
Modeling

Response: The comment refers to the statement in Section 6.3.3 of the DEIS that concludes, "rather than an increase there will be a decrease in emissions of sulfur dioxide (SO₂), oxides of nitrogen (NO_x) and particles (PM₁₀) as a net result of the proposed action. Therefore, any cumulative effects associated with these emissions may be viewed as benign, if not beneficial, in the context of the regional impacts that have been described." The last phrase of the second sentence (i.e., "in the context of the regional impacts that have been described") is important because the analysis that this statement is referring to is the analysis of cumulative effects. As shown in Tables 4.1-2 and 4.1-2a, sulfur dioxide (SO₂), oxides of nitrogen (NO_x), and particulate matter less than 10 microns in diameter (PM₁₀) loadings decrease as a result of the proposed action. The proposed action includes the curtailment of the P. H. Glatfelter Company's Power Boiler No. 4 and oxides of nitrogen (NO_x) reductions from the Transcontinental Gas Pipeline Company. Consequently, in the context of regional effects, there would be no incremental increase in emissions of sulfur dioxide (SO₂), oxides of nitrogen (NO_x), and PM₁₀ as a result of implementing the proposed York County Energy Partners, L.P. (YCEP) project. Since there would not be an incremental increase in these emissions within the bounds of the cumulative effects analysis, the effect on regional air quality would be "benign" and where it has been shown that reductions would occur, the effect would be "beneficial."

1 For the purposes of the record,
2 my name is Roy Eiguren, I'm an attorney at
3 law from Boise, Idaho, and I would
4 apologize to the members of the hearing
5 panel here. We had a scheduling
6 complication that precluded my being here
7 at three o'clock, but it is now 5:15 and
8 we're resuming our public hearing being
9 held on this particular matter in York,
10 Pennsylvania, on January 18th, 1995. We'd
11 like to go ahead and resume the receipt of
12 public comment. The next scheduled
13 commenter is Gerald W. Beck. Good
14 afternoon, Mr. Beck. Either microphone,
15 sir, whatever you'd like to do. Could you
16 please state your name for the record?

17 GERALD BECK:

18 Gerald Beck, 285 Hillside
19 Terrace. And our home that's in West
20 Manchester Township, by the way. Our home
21 is approximately about 100 feet from
22 Bannister Street, also about 1,000 feet
23 south of Route 30 West. We're
24 approximately about eight and a quarter
25 air miles northeast of Spring Grove where

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1 the cogeneration plant is planned to be
2 located. I think that as far as the
3 previous speakers to me, they were more
4 knowledgeable on the professional aspects
5 of the comments that I have to make. I
6 basically have one primary interest and
7 that is, the reason why I mentioned
8 Bannister Street and Route 30 is because
9 of the exhaust that we primarily are
10 getting from the --- mostly the diesel
11 engine vehicles that travel both of those
12 roads. And we do definitely get a deposit
13 from those on our property, such as on our
14 window sills, benches, chairs that we have
15 on the outside. There is a very
16 noticeable deposit very regular. We do
17 get the odors from Spring Grove on a very
18 regular basis. I understand that there is
19 a fallout that we can expect beyond about
20 a seven-mile radius of this particular
21 plant. My question, my concern and I wish
22 that you could give me a guaranteed
23 answer, with the pollutants that we now
24 are getting at our particular residence,
25 can you guarantee us that we will not

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J-85/08

Response: Comment is noted.

KEYWORDS:

Air emissions
Odors

J-85/21

Response: Emissions from the proposed York County Energy Partners, L.P. (YCEP) project would impact nearby receptor points--such as a residence. These impacts are analyzed and discussed in Section 4.1.2 of the EIS. The air quality modeling used in the analyses that were undertaken was very conservative and did not take into account the emission reductions that would ensue from the curtailment of the P. H. Glatfelter Company's Power Boiler No. 4 to a maximum of 720 hours per year of concurrent operation with the proposed YCEP Facility. It was assumed that the proposed YCEP project and Power Boiler No. 4 would operate at the

KEYWORDS:

Air emissions
Health effects

(continued)

1 receive any diverse pollutants from this
2 particular plant? That's about all that I
3 have to say at this particular time and I
4 thank you for the opportunity.

5 ROY FIGUREN:

6 Thank you, sir, I appreciate it.
7 I would note for the record that the
8 specific questions that are asked for the
9 record and will be responded to in the
10 final document. The next scheduled
11 commenter is Michael S. Schmotzer. Good
12 afternoon, sir. Can we have your name and
13 address for the record, please?

14 MICHAEL SCHMOTZER:

15 Michael S. Schmotzer, I live at
16 2428 Schoolhouse Lane, York, Pennsylvania.

17 ROY FIGUREN:

18 Thank you.

19 MICHAEL SCHMOTZER:

20 I'd like to read a prepared
21 statement and I will leave a copy with
22 you.

23 ROY FIGUREN:

24 Fine. Thank you.

25 MICHAEL SCHMOTZER:

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same time. Modeling results indicated that air quality would remain well below National Ambient Air Quality Standards, and concentrations of criteria pollutants would be 27 percent or less of their respective allowable Prevention of Significant Deterioration (PSD) increments, or would be below EPA significance levels. Air toxics and radionuclide emissions were analyzed. Emissions from the proposed cooling tower were analyzed. The health risks from emissions were also discussed. The results of these analyses indicate that impacts of the proposed project should have no measurable adverse effects on human health.

1 And I will include certain
2 attachments to my prepared statement that
3 I wrote.

4 ROY EIGUREN:

5 Fine. We'll include those in
6 the record as received, sir.

7 MICHAEL SCHMOTZER:

8 Thank you. The stated goal of
9 the Department of Energy Clean Coal
10 Technology Program, and it's in your EIS,
11 is to demonstrate advanced coal
12 utilization technologies that are energy
13 efficient and reliable and are able to
14 achieve substantial reductions in
15 emissions as compared with the
16 conventional coal technologies.

17 42 U.S. Code 4332 and 40 CFR
18 1502 required the preparer of the
19 Environmental Impact Statement to consider
20 alternatives to your proposed plan. This
21 has been done in various paragraphs of the
22 statement and the summary is provided in
23 paragraph 2.3. However, I believe that
24 the Department of Energy's analysis is
25 inadequate and the conclusion is

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1 erroneous. There are several points that
2 require further elaboration and
3 correction.

4 Paragraph 2.2.4 discusses the
5 No-Action Alternative. It assumes that if
6 DOE money is not used the York County
7 Energy Partners will not construct the
8 proposed facility and that three negative
9 consequences will result. One, DOE would
10 not achieve one of the goals of the CCT
11 program. Two, the P.H. Glatfelter Company
12 Power Boiler Number Four would continue to
13 pollute York County. And three, Met-Ed
14 would have to build another power plant to
15 make up for future short-fall in
16 commercial energy needs. Now, I cannot
17 speak for point number one from personal
18 knowledge, but I believe there has been
19 previous testimony and other things that
20 have been submitted to DOE, to the effect
21 that this technology has been reliably
22 proven at other sites within the United
23 States and abroad and there is sufficient
24 technological data to place the
25 circulating fluidized bed technology

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J-88/20

Response: Please see the responses to Comments D-37/16, D-39/13, D-90/2, and D-100/9.

KEYWORDS:

Alternative technologies

1 within a clear spectrum of coal burning
2 power plants and alternative energy
3 sources. It then does not make sense to
4 build this plant if we already know that
5 better things are out there, therefore the
6 project is unnecessary.

7 Point two, in your justification to
8 reject the No-Action Alternative, you
9 state that, I quote, the opportunity to
10 reduce air emissions through curtailment
11 of P.H. Glatfelter Company, Power Boiler
12 Number Four would be lost, end quote. I
13 believe that such is not the case. P.H.
14 Glatfelter must comply with the Clean Air
15 Act, it's in various other Federal and
16 State laws and regulations which govern
17 air pollution. I have a copy, and I'll
18 provide it to you, of the Pennsylvania
19 Department of Environmental Resources,
20 their plan approval dated August 18th,
21 1994, it allows Glatfelter to modify
22 Boiler Number Four by installing a low NOx
23 burner with separate overfire air.

24 While Glatfelter should be
25 commended for bringing their facilities

(continued)

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J-89/7

KEYWORDS:

Alternatives analysis
Assumptions
Boiler No. 4
Clean Air Act

Response: If the no-action alternative is selected, the assumption that the P. H. Glatfelter Company's Power Boiler No. 4 would continue its operation "as is" is valid based on correspondence received from the P. H. Glatfelter Company (letter from R.W. Wand to R.C. Kenner, Jr. dated December 15, 1993), as well as on the interpretation of applicable requirements for industrial boilers under the Clean Air Act (CAA) (as discussed in more detail below). Thus, as a ramification of the no-action alternative being selected, it would appear that reductions in air pollutants due to either the decommissioning/curtailment of P. H. Glatfelter Company's Power Boiler No. 4 or retrofitting of P. H. Glatfelter Company's Power Boiler No. 4 to meet new clean air standards would not occur. It should be noted, however, that low NO_x (oxides of nitrogen) burners have been installed on Power Boiler No. 4 as Reasonably Available Control Technology (RACT) in order to comply with current regulations (as outlined in RACT Plan Approval 67-2004 for the existing pulp and paper mill operations).

Nothing in the CAA would statutorily preclude the P. H. Glatfelter Company from continuing to operate its Power Boiler No. 4 should the proposed project not be built. Because it is located in the Northeast Ozone Transport Region, which is classified as a marginal nonattainment area for ozone under Title I of the CAA Amendments of 1990, the P. H. Glatfelter Company is required to install RACT to reduce emissions of oxides of nitrogen (NO_x). The recently installed low NO_x (oxides of nitrogen) burners on Power Boiler No. 4 are considered RACT for Power Boiler No. 4 and are a necessary step for generating emission reduction credits (for the proposed project) for oxides of nitrogen (NO_x).

The P. H. Glatfelter Power Boiler No. 4 is an industrial boiler used to produce steam. The provisions of Title IV of the Clean Air Act as amended in 1990 pertain to electric utilities and electric generating facilities. Within the provisions of Title IV (the so-called "opt-in" provisions) certain industrial boilers may optionally comply with the emission reductions provided for in Title IV and hence create sulfur dioxide (SO₂) "allowances" which can be sold on an open market to electric utilities. However, no reductions of emissions from P. H. Glatfelter Company's Power Boiler No. 4 are prescribed by the provisions of Title IV of the CAA Amendments of 1990.

With the proposed project, the P. H. Glatfelter Company has committed to transfer sulfur dioxide (SO₂) credits generated with the curtailment of its Power Boiler No. 4 to YCEP. Should the proposed project not be built, the P. H. Glatfelter Company would not be required to limit sulfur dioxide (SO₂) emissions under the Title IV of the CAA Amendments of 1990, although it could still choose to "opt-in" to the program should it be in the company's economic interest to do so. However, without the availability of an alternative source of steam for plant operations, it is unlikely that the P. H. Glatfelter Company would choose to curtail operations of its Power Boiler No. 4 in the foreseeable future.

(continued)

1 into compliance with the clean air
2 requirements, it does not automatically
3 follow that we should use DOE and
4 therefore tax dollars to assist them.
5 Like other U.S. industries Glatfelter
6 should meet the requirements and they
7 should meet them with their own capital
8 expenditures. We do not yet know if this
9 modification has been done or it has done
10 the job. According to the DOE program ---
11 DER, excuse me. DER program manager, the
12 regulatory compliance date is May 31,
13 1995. I must assume that should the
14 modifications fail to achieve their
15 required end, further changes will be made
16 by Glatfelter, therefore the DOE project
17 is unnecessary.

18 And to the last point, the
19 Environmental Impact Statement states that
20 on page 2-71, quote, Met-Ed has documented
21 the need for an additional 500 to 550
22 megawatts of electricity by the year 2000,
23 end quote. However, that statement is not
24 in full agreement with section 1.3.4,
25 which states that, quote, on the basis of

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Under the New Emission Sources of Hazardous Air Pollutants (NESHAPS) Program (Title III) of the CAA Amendments of 1990, authority is given to the Environmental Protection Agency (EPA) to regulate emissions of a specific list of hazardous air pollutants (HAPs). However, unlike earlier attempts to limit emissions of HAPs to a "no-effects" level, the CAA Amendments of 1990 is driven by the achievable reduction technology rather than on the level of reduction deemed "safe." That is, the approach is "technology based" rather than "risk based."

Under Title III of the CAA Amendments of 1990, the EPA is tasked with identifying "Maximum Achievable Control Technology" (MACT) for regulated hazardous pollutants and industry-types. The EPA has proposed rules for Pulp and Paper Production (58 FR 66078). If the P. H. Glatfelter Company is a major source (10 tons/yr or greater of any listed HAP or 25 tons/yr or more of a combination of HAPs) with respect to the specific list of regulated HAPs, under the proposed rules, the company would likely be required to comply with MACT for its specific operations which are major sources of emissions of HAPs. Because the requirements of Title III of the CAA Amendments of 1990 are industry specific, any requirements placed on the P. H. Glatfelter Company (pulp and paper mill) with respect to HAP emissions would be unrelated to the proposed project (electric utility).

In summary, the "no-action" alternatives discussed in the EIS assume that the P. H. Glatfelter Company would continue to operate its Power Boiler No. 4 as it currently does. Because the EPA has not yet issued the final rules regulating HAP emissions for Pulp and Paper Production, the DOE made no presumptions as to the possible impact of these rules.

Please see also the responses to Comments D-106/1, D-297/4, and MK-7/29f.

J-90/18

KEYWORDS:

Met-Ed
Need for power

Response: There is no general disagreement between DOE and Metropolitan Edison Company (Met-Ed) concerning whether future energy growth will require additional supply resources. Documents submitted to the Pennsylvania Public Utility Commission by Met-Ed indicate that, based on present electricity growth rates, there will be a need for additional supply resources in order for Met-Ed to meet its reserve margin obligations as a member of the Pennsylvania-New Jersey-Maryland (PJM) Interconnection Power Pool. Selection of the most economical means of achieving the required reserve margins is beyond the scope of the EIS. However, a discussion of Met-Ed's option to purchase needed electricity from the PJM power pool has been added to the FEIS (Section 4.3.3). Please see the responses to Comments D-83/5, D-119/11, and D-137/21.

1 an independent review of Met-Ed's need for
2 power, DOE has determined, I emphasize
3 that, DOE has determined, that --- has
4 determined that a need for additional
5 electric generating capacity exists, end
6 quote. I believe that there has been
7 other testimony to the effect that DOE and
8 Met-Ed do not fully agree on the need for
9 future energy growth. Furthermore, while
10 the Environmental Impact Statement offers
11 two scenarios of alternative power plant
12 construction, it totally fails to discuss
13 that a viable program of conservation
14 would obviate the anticipated need for
15 power plant construction. Since the
16 supporting existing regional energy grid
17 is not among the stated goals of the CCT,
18 the EIS fails once again to clearly
19 justify why DOE dollars should be spent on
20 this project. End of my statement.

21 ROY EIGUREN:

22 Thank you, sir. If you'd like
23 to present that to me, we'll go ahead and
24 mark it as an exhibit, include it in the
25 record as received. Thank you very much.

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(continued)

J-91/9

KEYWORDS:
Alternatives
Conservation

Response: Many alternatives could have been considered in discussing the ramifications of selecting the no-action alternative. These alternatives could have included conservation, as well as other technologies, such as geothermal and solar. However, the two alternatives addressed in the DEIS (coal-fired twin boilers or a natural gas-fired boiler) are reasonably foreseeable under the no-action scenario. Since the writing of the Draft Statement, the purchasing of electricity on the open market has been presented as a reasonably foreseeable no-action scenario. The FEIS has been revised to include an analysis of this new alternative.

Please see also the responses to Comments D-37/16, D-42/2, D-120/19, and D-201/4.

J-91/16

KEYWORDS:
Need for project

Response: Comment is noted.

1 The written comments of Michael S.
2 Schmotzer will be included in the record
3 as received, they're dated 18 January
4 1995, attached to his written comments are
5 several documents from the Commonwealth of
6 Pennsylvania related to the Department of
7 Environmental Resources.

8 Our next scheduled commenter is
9 David C. Palmer. Good afternoon and
10 welcome, Mr. Palmer. If we could have
11 your name and address for the record,
12 please.

13 DAVID PALMER:

14 David Palmer, 2640 North
15 Sheraton Road.

16 ROY FIGUREN:

17 Thank you.

18 DAVID PALMER:

19 I had an opportunity to study
20 this Environmental Impact book and it
21 seems like every time I get to any form of
22 documentation there's no substance that
23 supports your findings. A good example is
24 your noise, it says noise at 70 decibels.
25 It doesn't show the whole complete

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J-92/23

KEYWORDS:

Cumulative effects
Noise

Response: The range of audible frequency that is conventionally taken to be the normal frequency range of human hearing is 16 to 20,000 hertz. The noise measurements used in the assessment were collected in "A-weighted" decibels (dBA). The A-weighting gives greater significance to sounds which are within the mid-range audible to the human ear. Therefore, the sounds which were measured and modeled for the proposed project do, in fact, reflect what the human ear can detect. It is also noted that sound pressure levels are not arithmetically additive.

Tables 4.1-35 and 4.1-36 in the EIS show the projected noise increases for both the construction and operation phases, respectively, for the proposed project. The highest increase in noise during construction is expected to be 3 decibels during steel erection. This increase would occur at the residence nearest to the project site. This residence is located approximately 213 meters (700 feet) south of the proposed project site. The highest increase in noise during the operational phase of the project is also expected to be 3 decibels. This increase would occur at four locations including three residences and the T & J Breeder Farm building. An increase of 10 decibels over baseline could be expected at the T&J Breeder Farm building during coal car coupling/decoupling. However, these events would be infrequent (once every 4 or 5 days) and would occur during daytime hours.

1 spectrum that's going to be affected, from
2 0 to 32 hertz --- 3,200 hertz, that's
3 basically what the ear can detect. It
4 doesn't also show the already prevalent
5 noise and what's going to happen if you
6 had this superimposed noise overtop of the
7 noise that's already there.

8 A good example is also the air
9 pollution, it shows a diagram where you'll
10 see a circumference where it's going to be
11 affected. But your book left out all the
12 other plants in York County that are
13 already affecting York County. Why can't
14 we have this overlay to show the real
15 black hole where people are going to
16 really experience a problem? It seems
17 like there's so much not informed to the
18 general public.

19 With this study I was massively
20 confused about it because I'm under the
21 impression the Department of Energy is one
22 who's going to give the green light to
23 build this plant. And also you did the
24 study, that is extremely biased and
25 unfair. How come an independent engineer

(continued)

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J-93/8

KEYWORDS:

Air quality
Cumulative effects

Response: It is assumed that the comment "diagram where you'll see a circumference where it's going to be affected," refers to Figure 6.3-1 in the DEIS, which depicts the geographic boundary for the air quality cumulative effects analysis. That figure is intended to define geographically the extent of the analysis and not to identify specific emission sources. Specific emissions sources were included in the Prevention of Significant Deterioration (PSD) emission source inventory. As stated in the EIS, "[t]he emission inventory includes a total of 39 facilities and 102 individual stacks in the inventory of sulfur dioxide (SO₂) sources within 55 km (34 mi), and 19 facilities with 66 individual stacks for oxides of nitrogen (NO_x) sources within 55 km." These sources represent the various emission sources "affecting York County," and are the basis of the ambient air quality data used in the air quality modeling analyses for the York County Energy Partners, L.P. (YCEP) project.

J-93/19

KEYWORDS:

NEPA
Oversight

Response: The lead agency for a government action is responsible for ensuring that National Environmental Policy Act (NEPA) requirements are executed. As such, it is typical for these agencies to oversee the NEPA process and to ensure that the required documentation is developed.

Through the issuance of a Record of Decision, DOE will determine only if Federal funds should be expended on the proposed project. The U.S. Army Corps of Engineers, Baltimore District, had an oversight responsibility for the review and writing of the EIS. One of the reasons for this arrangement was to provide independent oversight with respect to analysis of information. Other parties offered multiple layers of internal review. It is believed that the mechanism and redundancy of review provided for an unbiased report.

Please see also the response to Comment D-125/12 for more information about the parties involved in the writing and review of the EIS. The comment responses for D-287/16 and PNP-12/94d also address this general issue.

1 consultant wasn't hired to do the study?
2 There's a very big conflict here with the
3 whole book and I would like to know why we
4 can't have a fair study, present it and
5 stop fooling the public. And can we have
6 that submitted?

7 ROY FIGUREN:

8 Sure, yes. Your question for
9 the record is noted for the record and it
10 will be responded to in the final
11 document.

12 DAVID PALMER:

13 Thank you.

14 ROY FIGUREN:

15 Thank you. Ladies and
16 gentlemen, I would note at this time that
17 that completes the list of individuals who
18 have registered, either pre-registered or
19 registered at the door to comment at this
20 public hearing. I would ask if there are
21 individuals in the audience who have not
22 commented that would like the opportunity
23 to do so, if so please raise your right
24 hand. Yes, ma'am. Please, if you would
25 like. Are there others? We're going to

(continued)

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1 have two. Okay. Ma'am, why don't you
2 please step forward. If we could have
3 your name and address for the record,
4 ma'am?

5 NANCY AYMOLD:

6 Nancy Aymold, 4130 Robin Hood
7 Drive.

8 ROY EIGUREN:

9 Spell the last name, please.

10 NANCY AYMOLD:

11 A-Y-M-O-L-D.

12 ROY EIGUREN:

13 Thank you. Please proceed.

14 NANCY AYMOLD:

15 You're welcome. I live seven
16 miles from the Glatfelter plant. I have
17 an asthmatic granddaughter. I can't read
18 it.

19 ROY EIGUREN:

20 Ma'am, we'd like to have that
21 for the record. If you'd like to submit
22 it for me I'll go ahead and include it in
23 the record.

24 NANCY AYMOLD:

25 Okay. I'm sorry.

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ROY FIGUREN:

That's fine. Thank you very much. Madam Court Reporter, I would note for the record that the individual just identified herself for the record and has submitted to me her written statement which she intended to read. I would note for the purposes of the record, ma'am, in these sorts of proceedings, written statements have exactly the same weight, are treated exactly the same way as oral statements, so this will have the same effect legally. Thank you very much.

Our next scheduled commenter is Steven E. Baker. Mr. Baker. We welcome you, sir. If we could have your name and address for the record. And you may please proceed.

STEVEN BAKER:

Steven Baker. And it's 2252 Dixie Drive, York. Thank you.
Good evening. I've read through parts of your EIS and have just a few comments. The section on need for a new plant is what I looked at. One of the

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1 things you talked about is energy security
2 and it's quoted as, that coal was
3 recognized as having substantial potential
4 to reduce dependence on imported oil and
5 enhance the energy security of the US. My
6 question is, doesn't natural gas also have
7 the potential to reduce our dependence on
8 imported oil?

9 And an even better way I can
10 imagine to achieve real energy security is
11 to implement energy conservation policies
12 and programs. This in turn, reducing our
13 dependence on foreign oil by controlling
14 our consumption. Why pick coal to
15 demonstrate on this project? Coal is one
16 of the dirtier burning fossil fuels and
17 then not even respect us enough to
18 demonstrate it with the best possible
19 technology. Why coal?

20 I think some of us in this room
21 know why coal was picked. My guess is
22 that the coal mining lobby was successful
23 in buying influence in Congress in the
24 1980s. And, gentlemen, we are no longer
25 living in the 1980s. And if the DOE were

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J-97/5

KEYWORDS:

Energy management
National security

Response: Utilization of natural gas resources also has the potential to reduce our dependence on imported oil. DOE has research programs promoting the development and use of a wide variety of energy sources: natural gas, coal, and energy renewables (e.g., biomass) to name a few. In addition, conservation is also being pursued as an energy management strategy. By having a strategy of diversification, flexibility in terms of meeting future energy demands can be better achieved.

However, in terms of United States electrical generation, coal continues to fuel the most plants. In 1990, coal provided 1,557 billion kilowatt hours, while nuclear power provided 577, hydroelectric power provided 280, natural gas provided 263, petroleum provided 117, and other (geothermal, wood, wind, waste, and solar) provided 11 billion kilowatt hours [*Energy Facts 1990, Energy Information Administration, Washington, DC, DOE/EIA-0469(90)*].

Please see also the response to Comment D-42/2.

J-97/9

KEYWORDS:

Energy management
National security

Response: The monies that are proposed to be used for partial funding of this proposed project were specifically set aside by Congress for use in the Clean Coal Technology Program. Please see the responses to Comments J-97/5 and D-37/16, which are related to the issues raised.

1 a responsive government agency their needs
2 would change away from outdated heavy
3 pollution technologies.

4 Next thing was the YCEP meeting.
5 YCEP supposedly has a need for this
6 project. Quoted as saying in September
7 1991 YCEP became aware that the Clean Coal
8 Technology Program funds for the City of
9 Tallahassee project might be transferred
10 to another project for subsequent
11 demonstration.

12 Because of YCEP's ongoing
13 project development activities in the West
14 Manchester Township, YCEP expressed an
15 interest in funding and was selected by
16 DOE as the Industrial Participant in 1992.
17 This paragraph does not really identify
18 YCEP's need for this project. It does
19 clearly demonstrate an opportunity for
20 them. There is no need for YCEP to build
21 this project. The only need YCEP has is
22 to make a profit. That's it's --- pay its
23 employees, pay the stockholders and to
24 tell you the truth, that's not the
25 responsibility of the people in York

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J-98/20

Response: Comment is noted.

KEYWORDS:

Need for project

1 County. It's just ridiculous.

2 Finally, we have Met-Ed's need.
3 If you'll bear with me a second. It looks
4 like I lost my notes. But to sum it up
5 according to last Friday night's article
6 in the paper, that because of contractual
7 agreements between Met-Ed and YCEP and the
8 Public Utility Commission what Met-Ed's
9 need for this project to go through is now
10 starting to look like that's on shaky
11 ground.

12 But there is one group of people
13 whose needs you forgot in your EIS and
14 that is us, the residents of York County.
15 What do the people need? It's not in your
16 book anywhere. If I may be so bold to
17 say, I think what we really need is a
18 break from you guys. Our area is so
19 inundated and degraded with polluting
20 industries already that sometimes I feel
21 like I'm a laboratory mouse living in an
22 experimental environmental zone. What we
23 really need is to turn back new pollution,
24 clean up old pollution and start to
25 develop a new image of respect for

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J-99/7

Response: Comment is noted. Please see the responses to Comments D-83/5, D-119/11, and D-137/21.

KEYWORDS:

Need for power

J-99/12

Response: DOE has held several meetings in the York area to solicit comments regarding issues important to the people of York County. During the scoping meetings, DOE received over 600 scoping comments that were considered in the development of the DEIS. In addition, comments received at the public hearings relative to the DEIS were considered in the development of the FEIS. Through this mechanism, DOE has evaluated the expressed issues, concerns, and needs of the residents of York County.

KEYWORDS:

Comments
NEPA

J-99/19

Response: Comment is noted. A discussion of cumulative impacts is contained in Chapter 6 of the EIS.

KEYWORDS:

Cumulative impacts
Pollution

1 ourselves.

2 And, gentlemen, in that sense
3 you are not helping our needs to be met.
4 Thank you.

5 ROY EIGUREN:

6 Thank you. That concludes the
7 list of individuals who have registered to
8 comment this afternoon. I would again,
9 are there others who have not commented
10 that would like the opportunity to do so?
11 Okay. There are two gentlemen back here.
12 The gentleman in the white shirt, please.
13 Please step forward and give us your name
14 and address. We welcome you this
15 afternoon, sir.

16 GEORGE MYERS:

17 Thank you. My name is George
18 Myers of Codorus Township, North Codorus
19 Township, I'm sorry. I'm very close to
20 where this cogen plant is supposed to go
21 in. Number one, location. Why was this
22 spot picked? There is between 40 and 45
23 acres of land on the north, northeast side
24 of the Codorus Building on the P.H.
25 Glatfelter Company now. There would have

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J-100/21

KEYWORDS:
Site selection

Response: The precise location was selected by York County Energy Partners, L.P. (YCEP) as part of the agreement with the P. H. Glatfelter Company. One of the reasons this specific site was chosen was accommodation of utilities, pipelines, and pipe racks between the proposed project and P. H. Glatfelter Company plant. Please see Section 2.2.1.1 in the EIS for more information on the site selection process.

Please see also the response to Comment W-RJC-1/30m.

1 been --- the steam lines would have been
2 shorter, fresh water would have been
3 easier to get. The sewer system would
4 have been closer and the electric corridor
5 would have been also closer. Since this
6 cogen plant is going to be the largest in
7 the USA, I think YCEP wants to show it
8 off. It will be a gold plant. And if you
9 don't know what I mean by gold plant I'll
10 explain it to you. A money making plant.

11 Glatfelter will also enjoy
12 having this plant at the present place
13 because they will be able to get steam for
14 their logging operations. Now, the
15 employees say they call it --- they called
16 it an ice house, that's what you call it
17 in wintertime, no heat, wouldn't the steam
18 be nice.

19 Number two, coal burning. At
20 present the Glatfelter Company is burning
21 about 100 cars of coal every two weeks.
22 If the cogenerating plant is installed it
23 will burn about 200 cars every four days.
24 And this will not change the air
25 atmosphere, not at all. It goes like the

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J-101/19

Response: Please see the responses to Comments D-34/1 and J-39/11.

KEYWORDS:
Air emissions

1 old saying, guess what, water does run
2 uphill at sometime at some locations.

3 Fly ash, page 2-29, it is stated
4 that the fly ash is going to be
5 conditioned with water. How much water is
6 going to be used? Is it going to be half
7 and --- half water, half fly ash or is it
8 going to be sludge?

9 Now, they say it's going to be
10 --- half a while, one underneath the tank
11 that you can blow it into the transport
12 truck. So how are you going to blow
13 sludge? The trucks are supposed to carry
14 a load, according to the EIS statement of
15 25 ton. And it's supposed to be covered
16 or a tank.

17 Get ready Pennsylvania DOT, more
18 road damage.

19 Number four, lines closed. It
20 is stated there will be --- there will not
21 be any water taken out of Kessler's Pond
22 that would affect swimming, fishing or
23 things like that on account of taking
24 water from the pond. Well, the book says
25 that the water coming into Kessler's Pond

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J-102/3

KEYWORDS:

Fly ash
Operations
Sluicing

Response: Water would be added to the ash-conditioning unit to hydrate remaining calcium oxide (CaO) in the ash material to calcium hydroxide [Ca(OH)₂]. The amount of water that would be required depends upon the proportion of the calcium oxide in the bottom ash and fly ash material. In other similar circulating fluidized bed (CFB) facilities, typically 10 to 12 percent water by weight is added to the bottom ash and 18 to 20 percent water by weight is added to the fly ash. The moisture content of the final ash by-product for the proposed project would range between 10 and 20 percent. Therefore, the ash would have a dry, but not dusty, consistency.

J-102/24

KEYWORDS:

Kessler Pond
Water source

Response: The EIS makes no statement regarding the source of water for Kessler Pond, since that has no bearing on the impacts from the proposed facility. Kessler Pond is fed via a creek derived from Lake Lehman.

1 is coming from Lake Marburg which is
2 positively not true. And that the only
3 impact it has on the Lions Club building,
4 they are looking at a 200 foot high
5 building, that's the only impact. Plus
6 they will not be able to put their tables
7 out in the yard which they didn't do
8 before. They held their meetings on the
9 inside not on the outside.

10 How about impact on the
11 neighbors, are they going to have any
12 impact? If they are, I didn't see
13 anything in the EIS report. Why not?
14 First of all, it's going to be a lot more
15 traffic due to --- now, they claim it
16 isn't going to affect traffic, I don't see
17 how they figure that.

18 Odors, how about the odors, are
19 we going to have any odor? Noise, we
20 ain't going to have any noise; are we?
21 No, no noise. Only 24 hours a day, 365
22 days a year. And you people give them 24
23 months to complete the plant, why not give
24 them 23 years and they'll be used to the
25 noise by that time.

(continued)

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J-103/2

KEYWORDS:

Lions Club
Stack
Visual impacts

Response: The Lions Club was used as a sensitive visual receptor site for the analysis of visual impacts. However, this should not be construed to indicate that the only impact on the Lions Club would be visual in nature. It is reasonable to assume that the Lions Club building would experience a range of affects described in Chapter 4 of the EIS. In addition, it should not be construed that only the Lions Club would be visually affected by the proposed project. Please see Section 4.1.1 and Appendix C of the EIS for the analysis of visual impacts to additional receptors.

J-103/10

KEYWORDS:

Noise
Odor
Residences
Visual impacts

Response: Regarding visual impact on neighbors, please see the response to Comment D-207/11.

The EIS discusses employee, construction, limestone delivery, ash removal, and other traffic impacts associated with the proposed facility in Section 4.1.8 of the EIS.

Please see the response to Comment D-158/9 for a discussion of the impact of the proposed facility on odors. The FEIS has been revised to include a discussion on odors (Sections 3.1.2 and 4.1.2.10).

The response to Comment D-283/20 addresses the evaluation of the impact from noise that would be generated by the proposed facility. DOE would not set rigid construction time limits, but building permits commonly have expiration dates.

1 Tell us electricity, Met-Ed said
2 if a cogen plant goes in electricity is
3 going to go up. Why? Another thing, the
4 value of our homes, not mine, all of them.
5 I like the attitude of some people. I
6 guess they wouldn't mind moving, I don't
7 know. But I was asked did YCEP offer,
8 they did but they did not ask me to sell.
9 And if you look in the dictionary that's
10 two different categories.

11 Now, I suggest DOE ask for a six
12 month extension to bring their EIS book up
13 to date. If they can't do that who signed
14 the statement, did GPU or Met-Ed, did YCEP
15 or did DOE?

16 One last thing. An actor that
17 is working for YCEP glides as fast as a
18 horse can run. And if you don't believe
19 it, if anybody doubts my word, I will show
20 them some of the newsletters that were put
21 out since they tried to come to York
22 County. And if you read your local
23 newspaper, the statement was made,
24 electricity will not go up. But when
25 Three Mile Island was built they used

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J-104/1

KEYWORDS:
Electric utility rates
Met-Ed

Response: Please see the response to Comment D-137/17. It would be speculative on the part of DOE and beyond the scope of this EIS to estimate the impact on electricity rates. The Pennsylvania Public Utility Commission is the regulatory authority with jurisdiction over local electricity rates.

J-104/3

KEYWORDS:
Property values
Residences

Response: A discussion of the impacts of the proposed facility and the utility corridor on local real estate values has been added to Sections 4.1.12 and 4.1.14.12. There are both positive effects (e.g., tax revenue supporting infrastructure improvements) and negative effects (e.g., visual, traffic impacts) associated with the proposed project, but these would be expected to have little impact on property values.

J-104/11

KEYWORDS:
NEPA
Schedule

Response: DOE has revised the DEIS based on the comments received from the public.

The power purchase agreement is between York County Energy Partners, L.P. (YCEP) and Metropolitan Edison (Met-Ed) as ordered by the Pennsylvania Public Utility Commission. DOE was not a signing party to this power purchase agreement.

1 nuclear power. And they told us the same
2 BS, did it make it go up, a year
3 afterwards, your electricity went up.

4 Thank you.

5 ROY EIGUREN:

6 There was a gentleman in the
7 back of the room here who expressed
8 interest to speak. Yes, sir, would you
9 please step forward. Sir, if we could
10 have your name and address for the record?
11 And welcome you this afternoon.

12 THOMAS RABER:

13 My name is Thomas Raber. I live
14 at 1863 Pineview Drive in Dover Township.
15 I've grown up in West Manchester Township,
16 West York Borough. I've lived in North
17 Codorus Township, I spent a lot of time in
18 Spring Grove. I don't have a prepared
19 statement, I haven't read your documents,
20 I'm just talking about what I've seen
21 since I've been alive here. I grew up in
22 West York Borough thinking that maple
23 leaves were white on the top and green on
24 the bottom because of the plant. Their
25 pollution was finally stopped and they

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1 were put almost completely out of
2 business. Unfortunate for some of the
3 employees but it's definitely helped the
4 air quality in the area.

5 My girlfriend lives one and a
6 half blocks from the paper mill in Spring
7 Grove Borough on Constitution Avenue and
8 in the summertime she couldn't open her
9 kitchen windows because she had sawdust
10 and everything else across her kitchen
11 table and everywhere in her house just
12 from having her windows open. The smell
13 is horrible, the noise was horrible. They
14 have improved that in the last year with
15 their improvements in the plant. They
16 moved their wood processing thing a little
17 farther west, she doesn't have near as
18 much dirt. The truck traffic is down and
19 --- but this plant going in out there is
20 still going to add more to it.

21 My father suffers from chronic
22 emphysema, he lives on the border of West
23 Manchester Township and West York Borough.
24 And I got him to come to one of your
25 meetings down here when they were going to

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J-106/1

Response: Comment is noted.

KEYWORDS:

Air quality

1 put it in West Manchester Township. He
2 since has stopped his participation in
3 this but I'm still concerned about the
4 pollution that's going to be going into
5 this area from that when the wind is
6 blowing in the right direction. I'm not
7 very good at speaking but I think that
8 this plant should be stopped. If you want
9 to do this take it somewhere else and let
10 somebody else fight you. I think we've
11 had enough.

12 I'm thankful for all the people
13 that have read your documents and done all
14 the research, the people that researched
15 the creek, the air quality and everything
16 else. You know, the general people aren't
17 going to climb up your stacks and check
18 the air quality that's coming out of
19 there. We don't know if you're going to
20 comply or not. We know that P.H.
21 Glatfelter is one of the top polluters in
22 this State of air and water. And we've
23 had enough. I mean, I've seen vehicle
24 damage from the pollutants that come out
25 of their stacks, from our other power

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J-107/3

Response: Please see the response to Comment J-85/21.

KEYWORDS:

Air quality

Wind direction

1 plants around here. I have pictures of my
2 vehicle sitting in Spring Grove with one
3 of their accidents up there. And my
4 vehicle was bright red, it's only three
5 months old and it's totally white. I went
6 down there to talk to them about it, and
7 oh, we had an accident, you know, our
8 precipitators have malfunctioned and we've
9 covered the entire town with white
10 pollutant. Everybody was up in arms, they
11 told me they would get back to me with a
12 solution to the problem. And they never
13 contacted me.

14 I just want to go on record as
15 opposing the plant and I hope it doesn't
16 go in. I know you've already taken some
17 steps. Friends of mine that worked on the
18 recent upgrades at the plant have already
19 said they're already working on processes
20 to hook this thing up when it goes in.
21 The plant is being prepared now for it.
22 So they're pretty confident it's going to
23 go in. I hope that these people and
24 everybody else in York County fights this
25 thing to the bitter end and puts it out of

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J-108/14

Response: Comment is noted.

KEYWORDS:

General

J-108/17

Response: Following issuance of the FEIS, DOE will determine whether or not to fund this proposed project through its Record of Decision. Until then, no decisions regarding the outcome of this process can be made or should be assumed.

KEYWORDS:

NEPA process

1 business.

2 Thank you for my chance to
3 speak.

4 ROY EIGUREN:

5 Our next commenter is Kathy
6 Dolan.

7 KATIE DOLAN:

8 Katie.

9 ROY EIGUREN:

10 Katie. I'm sorry. Would you
11 give your address for the record, please?

12 KATIE DOLAN:

13 2252 Dixie Drive, West
14 Manchester Township.

15 ROY EIGUREN:

16 Thank you. Please proceed.

17 KATIE DOLAN:

18 I have been involved in trying
19 to keep this cogeneration plant out of
20 York County since it came to West
21 Manchester Township. And there we had
22 more success than we're having here. I'm
23 not a technical person, even though your
24 data is extremely technical. And I'm
25 certainly no expert on this and so it is

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1 DOE Energy Department is who is getting
2 paid to do this research, I'm not.

3 I just read a few things that I
4 was able to understand. And those are the
5 ones I made the comment on, obvious to the
6 other ones, I can't. It's a lot of
7 bureaucratic lingo and I was disappointed
8 in it.

9 One of the things I'd like to
10 call your attention to is the plant life
11 activity that is addressed in section
12 4-48. And the comment you're making is
13 that plant life is adverse --- could be
14 adversely affected. But, of course, ---
15 and by the end of the paragraph you say,
16 but it's within guidelines, on that
17 paragraph that I read. So even though
18 each chemical alone may fall within your
19 guidelines what you called acceptable,
20 what about the combination of these
21 chemicals that are falling on the crops,
22 is that taken into consideration, crops
23 and tree life that I'm concerned about?
24 What about the chronic affects of these
25 over a long period of time which I don't

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J-110/17

KEYWORDS:

Agriculture
Air emissions
Cumulative effects

Response: The principal source of adverse effects to crops and forests due to coal-fired power plants is acidic deposition ("acid rain"). Over time, the "permitted" reduction of 2,419 tons/yr in sulfur dioxide (SO₂) emissions and 272 tons/yr in emissions of oxides of nitrogen (NO_x) to the York air basin would be expected to reduce acid rain. The long-term effects to crops and trees of a reduction in acid rain would be expected to be beneficial, although extremely difficult to quantify.

The accumulation of trace metals in soils due to the proposed project was calculated using the maximum modeled air concentration and conservatively assuming continuous deposition for 35 years with no depletion or attenuation. The resulting maximum soil concentrations, which are tabulated on page 34 in the human health risk assessment for the proposed project (*Environ, 1994b*), are approximately 100 times lower than existing soil concentrations, with the exception of mercury (Hg), which is approximately equal to background levels.

Kabata-Pendias and Pendias (1984) tabulated phytotoxic levels for trace metals from various research studies. If the most conservative concentration given for each element tabulated is used, none of the trace metal soil concentrations from the proposed project would be expected to result in levels toxic to plants except for mercury, which one researcher, tabulated in the work cited, lists as phytotoxic at levels close to existing soil concentrations. Other researchers lists phytotoxic levels for mercury (Hg) approximately 10 times higher than the concentrations expected to result from the proposed project under the worst-case conditions modeled.

The uptake and actions of metals in plants depends on several factors other than just the concentration of the metal in the air or soil. Some plants species act as "accumulators"; others act as "rejectors" (*Markert, 1992*). Additionally, soil properties - particularly soil pH and E_h - are more critical in determining the availability of trace metals to plants than the actual soil concentrations (*Fergusson, 1990*). Moreover, the presence of elements in plants can interact with other elements in either antagonistic or synergistic mechanisms (*Markert, 1992*). For these reasons, it is not possible to assess specifically all possible effects on crops and trees from emissions from the proposed project. However, concentrations in soils resulting from the proposed project would not be expected to be toxic to plants common to the area, nor would the uptake of trace metals into plants used for food and feed be expected to affect agricultural resources or human health adversely.

1 think any of your studies also took into
2 effect.

(continued)

3 Also the other matter I'd like
4 to address is the health risk assessment.
5 And the only comment I have to make on
6 that is after much description of the
7 criteria used no conclusion is reached but
8 we are directed to appendix 80 available
9 in the public reading rooms. Why is this
10 not included as part of this document?
11 You go for ten pages describing the
12 criteria used to reach the conclusion.
13 And then you reach no conclusion, it's
14 very frustrating. I just think it's a
15 very deficient (phonetic) document. I
16 can't imagine anyone writing a book or any
17 kind of a term paper in college and not
18 reaching a conclusion after going through
19 great lengths to describe the problem,
20 which I don't think you're doing in any of
21 these arguments. It's a very frustrating
22 exercise, I think in paperwork and I think
23 it's a waste of everybody's time including
24 yours.

25 The other area I'd like to

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J-111/3

KEYWORDS:
Documentation
Health effects
NEPA

Response: The results of the risk assessments conducted for the proposed project are summarized in Section 4.2.1.11 of the EIS and the findings of the risk assessments are tabulated in Table 4.1.24. As stated in Section 4.1.2.11 of the EIS: "Based on the information presented in Table 4.1-24, the proposed project should, therefore, have no measurable adverse effects to human health."

Council on Environmental Quality (CEQ) regulations do not require inclusion of actual source documents in the EIS and encourage the use of inclusion by reference (40 CFR 1502.21) to reduce paperwork and eliminate excess volume in the Draft statement where public review will not be impeded. Material that is incorporated by reference must be reasonably available for inspection. DOE has satisfied this requirement by making project-specific referenced material that is not included in the EIS available in local public reading rooms (Appendix A).

J-111/11

KEYWORDS:
NEPA
Quality

Response: Comment is noted.

1 comment on is on page 4-70, this is really
2 worth reading, it's only one little
3 sentence. Based on the information
4 presented on table 4.1-24, which is a
5 summary on potential human health risks
6 for the proposed project, you say that the
7 proposed project should therefore have no
8 measurable adverse affects to human
9 health, you have this going on for several
10 pages describing the problems we could
11 have. I think only the most naive of us
12 would believe this, that all of these
13 chemicals going into our air and water
14 will have absolutely no effects on human
15 life.

16 Again, I'd like to reiterate
17 there, I think to say that is extremely
18 technical, not at all user friendly and
19 I'm really disappointed in DOE, I thought
20 you were supposed to be working for us as
21 a government agency. We are the
22 taxpayers, therefore, we are supposed to
23 be your clients, as it were. And I'm a
24 salesperson, I do a lot of presentations
25 in writing as well as verbally. And if I

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J-112/3

KEYWORDS:
Health effects

Response: DOE has not identified any potential health effects which would be expected to result from the proposed project. It is not the position of the Agency that the proposed project "will have absolutely no effects on human life." Rather, it is the conclusion of the DOE that, based on generally accepted risk assessment methodology used to assess risks to human health, exposures to expected emissions from the proposed project would be lower than the levels which would be expected to affect human health adversely.

J-112/16

KEYWORDS:
NEPA
Quality

Response: Comment is noted. Please see the response to Comment D-252/9.

1 give a presentation like this to one of
2 our clients I would never make a sale.
3 This is not at all easy to read, it's not
4 easy to digest, it's not meant to be, it's
5 quite obvious and I hope you can do better
6 on the final draft. Thank you.

7 ROY FIGUREN:

8 That completes our list of
9 individuals who have indicated their
10 interest in commenting at this public
11 hearing. Are there others here who have
12 not yet commented and would like a turn to
13 do so? If not then --- yes, sir. If
14 you'll please step forward toward the
15 microphones. If we could, sir, we'd like
16 you to give your name and address for the
17 record.

18 FLOYD BISTLINE:

19 Yes. My name is Floyd Bistline.
20 I live right over there, 698 Maryland
21 Avenue, right close to the fairground.
22 And I've been born and raised in York all
23 my life, the City of York, one year I did
24 not live in the city. So I'm from around
25 here and I don't have a prepared

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1 statement.

2 But all I'd like to say is, I'm
3 in favor of the cogen and I'm here,
4 skilled help, we did a whole lot of work
5 in the area which was mentioned here
6 earlier tonight and other powerhouses and
7 all kind of other things we have built.
8 And, you know, I'd say, well, you know,
9 organized craft.

10 And we're local people that live
11 local and somewhere along the line what is
12 said takes a lot of weighing one way and
13 weighing the other way. As far as air
14 quality, the way the wind flows through
15 the valley and the amount of coal that's
16 going to be used in this plant and that
17 just goes on and on and on.

18 So I know I am here to say to
19 you people, you know, I wish you'd make
20 the right decision and when it is built,
21 if it's built, I'd like to see it built
22 with skilled help. We have people here
23 that have had previous meetings, we have
24 people here this evening.

25 And, you know, somewhere along

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1 the line I think that skilled help has a
2 lot to be desired in this project. That
3 some of the malfunctions you're talking
4 about in previous accidents and the way
5 things are materialized and down the road,
6 you know, that's what we're here for as
7 skilled help to try and prevent things
8 like this from happening in the future.

9 So that's --- you know like I
10 say, I don't have no prepared statement
11 but I've been to a lot of your meetings, I
12 think I missed two and they all set way
13 back two and a half, three years ago when
14 you started this thing.

15 I'm a local resident first, a
16 skilled craftsman second. And, you know,
17 I just would like to relate that to
18 everybody here. There's a lot of people
19 wondering why we're here and has asked
20 questions why we're here and, you know, if
21 I have anything to do with energy
22 partners, no, we don't. We just want to
23 build when they want it built.

24 We want to be able to build it
25 for them and build it with skilled help

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J-115/24

Response: Comment is noted.

KEYWORDS:
General

1 and that's the biggest reason why we're
2 here. We're not from out of town,
3 Georgia, Florida, which has happened in
4 some of these other projects around here
5 with the outside contractors and outside
6 help has come into the area. And that's
7 not what we're all here about to represent
8 and I just want to make sure that that's
9 clear in everybody's head that understands
10 why, you know, we make this representation
11 at these meetings and that, they're to see
12 that, you know, different ones that does
13 go and it gets built with skilled help,
14 that's our biggest thing.

15 Thank you.

16 ROY EIGUREN:

17 Thank you, sir. I would ask
18 again, are there others here in the
19 audience who have not yet commented and
20 would like the opportunity to do so. If
21 not, then we will --- pursuant to the
22 registered notice for this particular
23 public hearing, we are scheduled to be
24 here until 8:00 p.m. this evening. We
25 will be so. We will do so and be prepared

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1 to received additional comment. I would
2 note for the record that the Honorable
3 Todd R. Platts, a member of the House of
4 Representatives for the Commonwealth of
5 Pennsylvania is slated to comment at
6 approximately 6:30 p.m. this evening.
7 What we will do, we will be in recess
8 until one of two things happens, either we
9 have additional individuals present
10 themselves here this evening to comment or
11 in the alternative until eight o'clock.
12 Thank you. We'll go off the record now.

13 OFF RECORD DISCUSSION

14 ROY FIGUREN:

15 We'd like to come back to order,
16 please. Ma'am Reporter, we'll go back on
17 the record. I would now like to formally
18 resume our public hearing being held by
19 the Department of Energy on January 18th,
20 1995. Could we have it quiet please?

21 We'd now like to formally resume
22 our January 18th, 1995, public hearing
23 being held on a draft of Environmental
24 Impact statement to the York County Energy
25 Partners Cogeneration facility. This

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1 hearing is being held in York County,
2 Pennsylvania.

3 As I mentioned earlier my name
4 is Roy Eiguren. I'm an attorney in
5 private practice. And I'm an independent
6 third party moderator for this particular
7 public hearing. My purpose is to make
8 sure that everybody has a fair and equal
9 opportunity to comment on the record.

10 I would note that the procedural
11 rules for this proceeding do not
12 specifically allow for individuals to
13 testify more than once at the hearing.
14 However, we have been very liberal in our
15 interpretation and use of those rules and
16 so both that in the prior hearings as
17 well as today, for those of you who would
18 like to speak more than once, we'll give
19 you that opportunity. But before we do
20 that, what I would like you to do is
21 indicate that during the recess there may
22 have been several people that have come
23 into the hearing room that might like the
24 opportunity to comment.

25 So once again I will ask the

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1 question, are there individuals here who
2 have not commented yet but would like to
3 do so for the first time? If not, then
4 several individuals approached me during
5 the recess indicating they are interested
6 in once again going on the record to
7 comment again. And so for those of you
8 that would like to comment for the second
9 time, could you please raise your right
10 hand. We have four individuals. Would
11 you start with the first gentleman here.
12 Mr. Klunk.

13 JOHN KLUNK:

14 Thank you.

15 ROY FIGUREN:

16 Once again, we'd ask if you
17 would please give your name and address
18 for the record and please feel free to
19 proceed.

20 Ma'am Reporter, I'm going to
21 note for the record that Mr. Klunk is
22 prepared in using an overhead. I would
23 ask you, sir, are you planning to submit
24 that for the record?

25 JOHN KLUNK:

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1 I certainly can.

2 ROY EIGUREN:

3 That would be useful if you
4 would.

5 JOHN KLUNK:

6 Yes.

7 ROY EIGUREN:

8 Fine. Again, your name and
9 address for the record.

10 JOHN KLUNK:

11 My name is John Klunk, R.D. 4,
12 Box 4624, Spring Grove, Pennsylvania. I
13 would like to speak about the impact on
14 the use of Codorus Creek --- I'm sorry,
15 impact of wastewater recycling program on
16 a community. It's identified as an issue
17 of Appendix B. It's addressed in the
18 draft EIS, but not adequately due to the
19 following reasons:

20 Reason A, it is known and
21 photographic evidence has been submitted
22 to DOE indicating that the Glatfelter
23 facility produces local fogging and icing
24 in the vicinity of the mill complex and
25 the wastewater treatment area.

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J-120/20

Response: Please see the responses to Comments D-62/8 and D-153/15.

KEYWORDS:

Air quality
Documentation
Fog

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Reason B, the use of Glatfelter wastewater as proposed in the YCEP cooling towers would create a likelihood of an increase in fogging and icing concentrated in the area surrounding the proposed YCEP site due to the tremendous volume of water to be evaporated. The use of wastewater in the cooling towers would expose affected residents in the area to chloroform, a known carcinogen, phenol, other compounds and odor producing compounds not all of which have been identified in the draft EIS for the YCEP wastewater reuse feasibility study.

Why did the analysis of Glatfelter wastewater by Lancaster Labs performed for the wastewater reuse feasibility study not include all constituents of the Glatfelter wastewater?

C, the cooling tower modeling analysis revised final October 1994 is obviously flawed. Because although, quote, from the cooling tower monitoring analysis on-site meteorological data, unquote, is referred to. In reality there

(continued)

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J-121/7

KEYWORDS:

Carcinogens
Chloroform
Cooling tower
Health effects
Odor
Phenol
Wastewater

Response: The wastewater from the P. H. Glatfelter Company was sampled and analyzed for a variety of parameters (characteristics and constituents) during a pilot plant study for cooling tower emissions. Both inorganic constituents and volatile and semivolatile organic compounds were analyzed in the wastewater. The volatile organic compounds (VOCs) were analyzed to determine the components that could be released to the atmosphere during cooling tower operations; the other compounds were analyzed primarily to determine the degree of concentration of these constituents in the cooling tower blowdown or to determine the amounts that would be released in cooling tower drift. Given the 32°C (90°F) operating temperature of the cooling tower, semivolatiles would not "evaporate" from the cooling tower recirculating water and would tend to be "concentrated" in the cooling tower blowdown.

In terms of defining the scope of chemical analysis, especially with respect to release of volatile constituents in the cooling tower, DOE determined that it was appropriate to use the list of 189 air toxics in Section 112 of the Clean Air Act (CAA) Amendments of 1990 as a template, since these toxic compounds represent those that the Environmental Protection Agency (EPA) has deemed to be the most important in terms of being regulated. Phenol (C₆H₅OH) (CAS Number: 108952) was included on the list of compounds to be analyzed. Phenol was not detected above 10 µg/L (the limit of quantitation) in the P. H. Glatfelter Company's wastewater, and thus, as a semivolatile compound, would be concentrated in the cooling tower blowdown below quantifiable levels. It should be noted that some compounds, such as pesticides, herbicides, insecticides, or other compounds, were not considered relevant to the P. H. Glatfelter Company operations. Thus, these were not analyzed in the wastewater samples. The only VOC identified in the cooling tower make-up water that would be expected to be released to the atmosphere was chloroform. It should be noted, however, that chloroform could have been generated as a result of the chlorination process (used for algal control). It is hypothesized that sodium hypochlorite (NaOCl) reacted with color-contributing organics (tannins and lignins) contained in the make-up water to form chloroform, since chloroform (or any other volatile component) generated by the P. H. Glatfelter Company's bleaching processes would be largely removed via multiple aeration treatment processes.

In terms of compounds being responsible for odors associated with the paper pulp industry, sulfur (S)-containing organics are the compounds most often implicated. These include species such as methyl mercaptan and ethyl mercaptan. Given the low molecular weight of these compounds, their low boiling points, and their limited solubility in water, these compounds are very easily removed from wastewater via treatment processes such as aeration. Given that the P. H. Glatfelter Company's wastewater undergoes both primary and secondary treatment aeration processes, these compounds would be essentially removed from the wastewater prior to discharge to Codorus Creek or its anticipated use as cooling tower make-up water. Any residual odor that is associated with the P. H. Glatfelter Company's discharges

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is probably due to the decomposition of high molecular weight complexes (e.g., fragments of lignins and tannins) that contribute to the color and biochemical oxygen demand of the treated wastewater. Due to the solubility and high molecular weight of these compounds derived from tannins and lignins, these would not be expected to be volatilized in the cooling tower.

DOE acknowledges that all of the constituents (such as those contributing to color and biochemical oxygen demand) in the wastewater have not been characterized. It is very difficult to analyze "color" constituents derived from biological components, even using advanced analytical instrumentation (e.g., gas chromatographs and mass spectrometers) that was used to characterize the organic compounds in the wastewater. There are currently uncharacterized semivolatile compounds contained in the wastewater (as noted in the Wastewater Reuse Feasibility Study, 1994). These could be fragments of high molecular weight tannins and lignins. In addition, these compounds could also be artifacts generated upon "cracking" of higher molecular weight components that enter the high-temperature injector port of the gas chromatograph/mass spectrometer.

However, the DOE believes that it was appropriate to concentrate its efforts on performing wastewater analyses that would identify those volatile compounds that would be "releasable" from the wastewater, since the loading of these compounds to the atmosphere could be a significant emission source. DOE believes that the list of volatile compounds that was analyzed was comprehensive, especially given that the wastewater should not initially contain volatile components (due to P. H. Glatfelter Company's aeration process), and any volatile constituents in the cooling tower make-up would most likely be halogenated compounds generated from reaction of the chlorinating agent with organics contained in the wastewater.

Please see the responses to Comments D-83/21 and D-158/9 for further information on odors.

J-121/15

Response: Please see the response to Comment J-121/7.

KEYWORDS:

Characterization
Wastewater

J-121/22

Response: Please see the responses to Comments D-155/11 and J-28/6.

KEYWORDS:

Cooling tower
Meteorological data
Modeling

1 is no actual on-site data collected with
2 north or north site. 2.1.2 modeling input
3 data. 2.1.2.1 receptor grid network
4 states, flat terrain was assumed for the
5 modeling analysis, since no nearby terrain
6 is located above the top of the cooling
7 tower or fan release point, this obviously
8 ignores the actual terrain at the North
9 Codorus site.

(continued)

10 As you can see here the area in
11 the center here in the Spring Grove area
12 and all the areas enclosed by the blue
13 line is an elevation 500 feet above sea
14 level. The next set of lines are the
15 green lines, they're 600 feet above sea
16 level. The red line, pink ones, are 700
17 feet. This --- when they say not near,
18 that's a pretty vague statement. And I
19 know for a fact and as I said, I have
20 submitted evidence to the fact affected,
21 that there is a localized fogging and
22 icing problem because of the terrain. And
23 this was ignored in this process.

24 The big change likely to take
25 place, is a very large amount of moisture

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J-122/20

Response: Please see the responses to Comments D-155/11, D-104/9, and J-23/11.

KEYWORDS:

Fog

Moisture

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that accumulates and is basined in that area east of Spring Grove Borough, which is indicated as lagoons for Glatfelter where the wastewater treatment area is.

A great deal of moisture is presently liberated there and causes a real big problem. That problem when they evaporate the west part of the cooling towers it's going to be moved up closer to Spring Grove Borough. The tendency for those fogging situations when they do occur is for it to drift down the creek valley. It's going to expose a lot more humans to those wastewater smells. And I know what they're like because I live here.

All right. Reason D, page 4-41 of the draft of the EIS states, quote, the pilot plant included a trailer mounted cooling tower which simulated use of actual wastewater (P.H. Glatfelter Company secondary effluents drained) in a cooling tower that was operated at an average of two and a half cycle concentration to assess the performance of the proposed

(continued)

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1 cooling tower, unquote.

2 What I am troubled by here is
3 the wording which simulated use of actual
4 wastewater. I was under the impression
5 that actual wastewater was used in the
6 pilot plant for that evaluation. Why was
7 actual wastewater not used in the pilot
8 plant, what meaning could that word
9 possibly have had. What was actually used
10 in the pilot plant to simulate the use of
11 wastewater? I think these things really
12 need to be cleared up and answered.

13 E, the human health risk
14 assessment of a cooling tower emissions,
15 November 11th, 1994, should not be
16 considered valid because of obvious flaws
17 in the cooling tower modeling analysis
18 which was based on some of the data from
19 that and for failure to identify all
20 constituents in the wastewater and their
21 possible effects on human health.

22 Furthermore, the issue of odor
23 was ignored. Release of the cloud and all
24 contaminants including nonhazardous odor
25 producing compounds contained in the

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J-124/2

KEYWORDS:

Cooling tower
simulation
Wastewater

Response: The pilot plant included a trailer-mounted cooling tower simulator which used actual wastewater (P. H. Glatfelter Company's secondary effluent stream) in a cooling tower simulation that operated at an average of 2.5 cycles of concentration to assess the performance of the proposed cooling tower. Section 4.1.2.9 of the FEIS has been changed to clarify the description of the pilot plant study as reported in the Wastewater Reuse Feasibility Study.

J-124/13

KEYWORDS:

Characterization
Health effects
Modeling
Wastewater

Response: The Human Health Risk Assessment of Cooling Tower Emissions was based on guidelines provided by the EPA and consistent with well-established chemical risk assessment principles and procedures developed for the regulation of environmental contaminants. Both cooling tower make-up water (input) from P. H. Glatfelter Company's secondary effluent and cooling tower blowdown (output) were analyzed for relevant constituents to evaluate potential releases to the atmosphere. In particular, volatile organic compounds that could have resulted from the chlorination process were the primary focus of the DOE's characterization and health effects analysis, since these have the greatest potential of being released to the atmosphere and generating adverse human health effects. In addition, many of these components are on the list of 189 air toxics under Title III of the Clean Air Act (CAA) Amendments of 1990. All reasonable halogenated components that could result from the haloform reaction between the chlorinating agent and the "color" constituents in the wastewater were analyzed. These included the following: chloromethane (CH_3Cl), bromomethane (CH_3Br), methylene chloride (dichloromethane) (CH_2Cl_2), bromodichloromethane (CHBrCl_2), dibromochloromethane (CHBr_2Cl), chloroform (CHCl_3), and bromoform (CHBr_3). DOE adopted a risk-based approach to analyzing the components in the P. H. Glatfelter Company's wastewater and believes that all relevant, "toxic" volatile components that could be released to the atmosphere from the use of this wastewater in the proposed project's cooling tower were analyzed.

The Human Health Risk Assessment of Cooling Tower Emissions utilized air dispersion and water deposition estimates provided in the "Cooling Tower Modeling Analysis," to estimate environmental concentrations for the health risk assessment. There is no indication that input data or conclusions reached in the "Cooling Tower Modeling Analysis," were inappropriate or inaccurate.

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volume of wastewater proposed to be evaporated needs to be more thoroughly evaluated. Not only from the standpoint of physical but also the psychological health the residents in the Spring Grove area who would be exposed to nuisance odors produced by emissions from the cooling towers.

I would like to --- also I have failed to, when I first presented, state that I have submitted my pages of comments, six pages of comments at the beginning of the meeting along with my wife's comments and a report by Theta's (phonetic) Consultants done for our group also. I just want that included in the record.

ROY EIGUREN:

I will note that there was a --- will be received by the Court Reporter and included in the record for this hearing.

JOHN KLUNK:

Thank you.

ROY EIGUREN:

Thank you.

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(continued)

J-124/22

Response: Please see the response to Comment D-158/9.

KEYWORDS:

Cooling tower

Evaporation

Odor

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JOHN KLUNK:

I just got a couple items yet here. Table 3.1-9 summary of Codorus Creek water quality in the draft EIS is of little value because it represents only one sampling in that and it's six different sites. The Glatfelter Company should be --- have been able to provide information that would enable reporting of the full range of fluctuations which occurred to Codorus Creek water quality downstream of the Glatfelter facility through all seasons and flow scenarios. More complete information would be much more meaningful. As a representative of Codorus monitoring network I have given testimony at scoping meetings on three occasions and written to Doctor Van Ooteghem on five occasions. Since the action was proposed in York County expressing concern about potential impacts of the YCEP by coal burning power plant of Codorus Creek providing specific data about our organization relative to water quality and photographic evidence effects

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J-126/3

KEYWORDS:

Codorus Creek
Documentation
Water quality

Response: DOE believes the table is useful as a summary of Codorus Creek water quality when accompanied by the text of Section 3.1.4.1 and Tables 3.1-7, 3.1-8, and 3.1-10. The purpose of this section is to characterize the environment that would potentially be impacted by the proposed facility. Additional, though somewhat outdated, data are available in the Pennsylvania Department of Environmental Resources (PADER) (1987) Priority Water-Body Survey Report for Codorus Creek. Changes in discharges and waste treatment within the basin may have rendered the PADER data unreliable as an indication of current conditions.

DOE felt that new stream sampling and analyses were unnecessary, given available information on the low toxicity of P. H. Glatfelter Company's wastewater, the small change in contaminant loadings caused by the proposed project, and the relatively small proposed consumptive water use.

Please see the response to Comment W-LMY-1/10d.

1 that the Glatfelter Company has on local
2 atmospheric conditions.

3 The Department of Energy has
4 chosen to ignore that information
5 submitted and proceeded to write the draft
6 EIS in a manner that grossly misrepresents
7 the existing situation at the proposed
8 site at conditions of Codorus Creek. Not
9 only have they ignored our information,
10 they have ignored their own.

11 An example of this involved the
12 editing of crucial words from a sentence
13 in the Codorus Creek water resource study
14 produced for YCEP Environmental Resources
15 Management, Inc. I will read the two
16 sentences. Quoting, the 1990 --- from the
17 draft EIS this is how this reads. A 1979
18 SRBC survey found that Codorus Creek had a
19 clean water benthic community but high
20 color. ERM1994A, that's from the draft
21 EIS. This is cited. Now, the actual
22 document that was cited when I found this
23 sentence, it reads a little differently.
24 A 1979 SRBC survey found a clean water
25 benthic community upstream at Glatfelter's

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J-127/11

KEYWORDS:

Editorial

Water quality

Response: Section 3.1.4.1 of the FEIS has been rewritten to more accurately reflect the Susquehanna River Basin Commission's findings. Please see also the response to Comment W-JK-1/28k.

1 discharge. Different. But high color,
2 temperature, dissolved solids and total
3 organic carbon concentrations and a
4 benthic community dominated by pollutant
5 tolerant forms downstream.

6 That's quite a different
7 characterization than what was in this
8 document that you people had done for your
9 --- that YCEP had done. And this is
10 typical and really disturbing to find all
11 these broad statements and most this and
12 much that and the whole document is rife
13 with vague, unsubstantiated comments and
14 remarks and I think it's a disgrace.

15 Thank you.

16 ROY EIGUREN:

17 Just a point of reference in
18 terms of the documents that you're using
19 for the overhead.

20 JOHN KLUNK:

21 Yes. Okay.

22 ROY EIGUREN:

23 That would be useful to have in
24 the record and so we'd probably, if it's
25 possible to leave it with us, we could go

(continued)

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J-128/7

Response: Comment is noted. Please see the response to Comment D-252/9.

KEYWORDS:
Documentation

1 ahead and put in.

2 JOHN KLUNK:

3 I'll certainly do that. It's
4 just a USGS topical map pieced together as
5 best I could.

6 ROY EIGUREN:

7 We'll mark it as an exhibit and
8 include it. Thank you.

9 JOHN KLUNK:

10 I'll give it to you on paper.

11 ROY EIGUREN:

12 Or you can just mail it in by
13 prior closure.

14 JOHN KLUNK:

15 I'll give it to you right now.

16 ROY EIGUREN:

17 Fine. Thank you. We'll note
18 for the record that we have a copy of the
19 overhead projector map that was used by
20 Mr. Klunk in his presentation. We'll mark
21 it as Exhibit A in the record.

22 Now, for the second time, we
23 would ask Ms. Klunk. If we could please
24 have you step forward, ma'am, and give us
25 your name and address for the record

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1 again.

2 MARGARET KLUNK:

3 Margaret Klunk, R.D. 4, Box 4624
4 Spring Grove.

5 ROY EIGUREN:

6 Thank you.

7 MARGARET KLUNK:

8 Emissions --- Okay. I was going
9 to go over that same sentence John did, we
10 didn't compare our notes before we came,
11 so I'll skip that.

12 On page 328 in the second
13 paragraph it states, nevertheless, most of
14 the water quality measurements fall far
15 below the standards. So it is reasonable
16 to believe that most water quality
17 criteria are met at most, if not all of
18 the flow rates. I find a sentence like
19 that to be totally meaningless, when you
20 use most in a sentence three times, it
21 absolutely is poor. And when the truth is
22 that below Glatfelter's outfall
23 Pennsylvania instream water quality
24 standards for color and temperature are
25 not met, and that's on a regular basis.

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J-130/12

Response: The FEIS, Section 3.1.4.1 ("Surface Water"), has been rewritten to clarify the conclusions about Codorus Creek in-stream water quality drawn from the available data.

KEYWORDS:

Color
Criteria
Temperature
Water quality

1 In that same sentence --- or in
2 the same paragraph it states, the cause of
3 the high water hardness and the high
4 wintertime water temperatures are
5 uncertain, no source was referenced for
6 this statement, but certainly DOE could
7 have determined the cause. Just by
8 checking with Glatfelter's discharge
9 monitoring reports.

10 Next I'd like to direct your
11 attention to page B6 of Appendix B,
12 Environmental Impact Assessment
13 Methodology. Under Indicators for
14 Measuring Impacts of Human Health and
15 Safety, it states that you will use the
16 results of epidemiological study of the
17 Spring Grove area. York County's medical
18 societies have argued from the very first
19 scoping session that it would be prudent
20 to do an epidemiological study of the
21 Spring Grove area. I am heartened to see
22 that one will need be done now. Risk
23 assessments are usually not worth the
24 paper they're written on and that is
25 certainly true of those which were done by

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J-131/1

KEYWORDS:

Hardness
Temperature
Water quality

Response: The cause of high water hardness and high water temperature is uncertain because there are several National Pollutant Discharge Elimination System (NPDES) permitted dischargers to Codorus Creek, both above and below the P. H. Glatfelter Company's outfall, affecting water quality. Because of the multiple sources of both hard mineral and thermal pollution, it is impossible to determine the exact source of the loadings/exceedances to any particular source, either point or non-point.

J-131/13

KEYWORDS:

Epidemiology
Health effects

Response: In Appendix B of the DEIS, under "Indicators for Measuring Impacts," one of the listed indicators is "Results of epidemiological study of the Spring Grove Area." Prior to preparation of the DEIS, it was DOE's impression that an epidemiological study was possibly available for the Spring Grove area. No epidemiological study was found to exist in the scientific or public health journals for the Spring Grove or York County areas.

Analysis of human health effects resulting from the proposed York County Energy Partners, L.P. (YCEP) Cogeneration Facility is based on the specific risk assessments performed for this project, referenced literature, and on information provided to DOE by the York County Medical and Osteopathic Medical Societies and the Environmental Protection Agency (EPA), Region 3. This information is contained in Section 4.1.2.11 of the FEIS.

1 YCEP's paid consultants.
2 Unsightly aerological studies
3 were not required and cumulative impacts
4 from Glatfelter's total air emissions
5 including toxic air emissions were not
6 considered. It is especially ironic that
7 DOE allowed YCEP to use meteorological
8 data collected at West Manchester sites
9 instead of being required to collect data
10 at North Codorus site since DOE and their
11 own sufficiency review of the draft
12 environmental information volume stated.
13 At METC, we were told that due to the
14 complex hilly terrain we could not use
15 weather data from our airport five miles
16 away but rather that we needed to obtain
17 on-site meteorological data, the following
18 needed to be monitored, wind speed, wind
19 direction, temperature, solar radiation,
20 dew point, relative humidity and
21 barometric pressure. The West Manchester
22 site is more than five miles away. We
23 feel we deserve the same that you
24 recommended in your sufficiency review.

25 A pattern of antagonism toward

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J-132/2

KEYWORDS:

Air emissions
Cumulative effects
Toxics

Response: The cumulative impact analysis of the proposed York County Energy Partners, L.P. (YCEP) project is presented in Chapter 6 of the EIS. Cumulative impacts on air quality are presented in Section 6.3. As discussed in Section 6.3.3, the incremental effects of the proposed YCEP project were evaluated in relation to numerous air emission sources within the spatial boundary of the analysis [55-km (34 mi) radius]. The P. H. Glatfelter Company/Spring Grove facility was included in the inventory of sources used in the analysis. As stated in the EIS, "[t]he emission inventory includes a total of 39 facilities and 102 individual stacks in the inventory of sulfur dioxide (SO₂) sources within 55 km (34 mi), and 19 facilities with 66 individual stacks for oxides of nitrogen (NO_x) sources within 55 km." The P. H. Glatfelter Company/Spring Grove facility included six stacks in the sulfur dioxide (SO₂) and oxides of nitrogen (NO_x) emissions inventory. The analysis of cumulative effects of toxic air emissions was based on a trend analysis of information provided by the State of Pennsylvania in its Toxic Release Inventory and the incremental contribution of the YCEP project to overall levels of toxic emissions. The State's Toxic Release Inventory includes emissions from all known sources, including any known toxic releases from the P. H. Glatfelter Company/Spring Grove facility. As stated in the EIS, because of the predicted low concentrations of air toxics that would be produced by the proposed YCEP project, the decline in emission trends, and ongoing implementation of the provisions of Title III of the Clean Air Act that outlines a new regulatory approach for reducing air toxic emissions and for promoting a reduction in public exposure to air toxics, the proposed YCEP facility would not have a significant cumulative impact on air quality as a result of the release of toxic emissions.

In addition, Section 2.1.3 (Air Pollution Control subsection) of the FEIS has been revised to add a discussion of the toxic air emissions monitoring that would be performed for the YCEP project.

Please see also the responses to Comments J-28/6 and D-155/11.

J-132/13

KEYWORDS:

Meteorological data
Modeling

Response: As discussed in the responses to Comments D-62/8 and D-155/11, the upper air and ground-level meteorological data used for modeling were determined to be appropriate for the conditions associated with implementation of the proposed action.

1 the public began in August of 1993, the
2 date of the first scoping hearing. It was
3 designed to discourage the public
4 participation, at least the participation
5 of those opposing the project. We have
6 been denied timely access to documents
7 over and over again. We have been forced
8 to ask for public documents via the
9 Freedom of Information Act when they
10 should have been supplied by DOE willing
11 without. Promised documents never came
12 without a fight. I would describe the
13 DOE's relationship to the public and their
14 participation in this project as
15 adversarial.

16 For example, the scheduling of a
17 scoping hearing for only one night, even
18 though DOE knew that with the number of
19 citizens registered to speak, the meeting
20 would continue to 1:00 or 2:00 a.m. the
21 following morning. Allowing only three
22 weeks to review the Draft Environmental
23 Impact Statement prior to the first set of
24 public hearings, scheduling a public
25 hearing at the height of the holiday

(continued)

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J-132/25

KEYWORDS:

NEPA

Response: DOE has made every effort to be responsive to the needs of the public, to provide information to the public in a timely manner, and provide an open forum for public participation in the National Environmental Policy Act process, by following the regulations for implementing the procedural provisions of the National Environmental Policy Act (40 CFR Part 1500) and the DOE's regulations for implementing the National Environmental Policy Act (10 CFR Part 1021). DOE disseminated only official documents and not draft reports. DOE tried to meet the public's needs by scheduling additional public meetings when needed, extending comment periods, and establishing three public reading rooms (Appendix A) in the York area.

Please also see the responses to Comments D-31/22, D-32/13, D-59/22, and D-252/9.

1 season. Only public outcry on each of
2 these occasions plus support from Senator
3 Spector and Wofford, Congressman Goodling
4 and Representative Todd Platts, persuaded
5 DOE to do the right thing. Something has
6 gone very wrong when DOE, a branch of our
7 Federal Government appears to be working
8 for the Industrial Participant, Air
9 Products and Chemicals. The Draft
10 Environmental Impact Statement is stacked
11 with unsubstantiated and worse, down right
12 false statements, favorable to the
13 projects developer. Shouldn't DOE instead
14 be working in an unbiased fashion to
15 protect our environment and our health and
16 our safety, something has gone terribly
17 wrong with this process.

18 ROY EIGUREN:

19 Thank you. Doctor Clark. And,
20 sir, could we have your name and address
21 for the record?

22 RICHARD CLARK:

23 Yes. Thank you. Richard Clark.
24 I'm a resident from North Codorus
25 Township, R.D. 7, Box 7238.

(continued)

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ROY EIGUREN:

Thank you.

RICHARD CLARK:

I'm trying to avoid being totally negative so I would commend either the proponents or the DOE or who was responsible for the inclusion of washed coal being proposed as a fuel. I think that's something that Diane Esher (phonetic) of EPA had suggested, and whether that's where it originated or not, I don't know.

Also that the --- I see from the document that Pennsylvania coal is proposed to be used as opposed to coals from other states. Mr. George Myers had suggested that a six-month, sort of a hold, in some of these things and the whole process, I wouldn't go that far, but I would strongly urge the DOE to produce an erratum/appendum for this document before it would be considered a final draft.

Okay. And before we get into the final itself. And this should be

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J-135/20

KEYWORDS:

Errata

NEPA

Revisions

Response: The FEIS is an annotated update of the DEIS based on the comments received during the public comment period. All changes from the DEIS are denoted in the FEIS with a "***bold italics***" font. If there have been changes or updates to source information/data, these are also shown in ***bold italics*** font in the FEIS.

The basis for the Record of Decision will be the information contained in the FEIS. This FEIS was generated by DOE in response to issues identified by DOE and other agencies, and by the public during the public scoping and hearing processes.

1 issued to the public so that the public is
2 made aware of what finally was used as a
3 basis for the production of, number one,
4 the final Environmental Impact Statement,
5 and perhaps as importantly, what was the
6 basis for the Record of Decision, which I
7 would urge based on the Environmental data
8 and a number of other things, would urge
9 that that be a negative decision.

10 I would reiterate again
11 something that I said earlier and
12 something Johannes had indicated and
13 Margaret Klunk had just indicated as well,
14 that local meteorological data be used.
15 The DOE had characterized over the authors
16 of the EIS were --- had characterized the
17 wind rose for Harrisburg and West
18 Manchester as being similar. I would urge
19 those involved to utilize as much support
20 for their statements as possible.

21 For example, that
22 characterization could be examined
23 statistically. There are statistics
24 appropriate for circular distributions.
25 So rather than subjectively claiming that

(continued)

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J-136/14

Response: Comment is noted. Please also see the responses to Comments D-155/11 and J-27/25.

KEYWORDS:

Meteorological data

1 it's similar that that could be
2 statistically tested. Would urge again
3 that raw data be included to support
4 claims as much as possible. Would ask the
5 DOE to urge or caution or whatever term
6 might be appropriate, the proponents for
7 this project, to stop misrepresenting it
8 in the local media.

9 It has consistently been
10 advertised as something that will reduce
11 overall emissions. If you say that it
12 will reduce selective overall emissions,
13 that's correct. But when you say that it
14 will reduce overall emissions, that's
15 inaccurate, and that has been done
16 consistently.

17 I have nothing further. Thank
18 you.

19 ROY EIGUREN:

20 Thank you, Doctor Clark. There
21 was one individual who wanted to come and
22 a second --- yes, ma'am. If you'll please
23 step forward and give us your name and
24 address for the record.

25 CONNIE SCHMOTZER:

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J-137/4

KEYWORDS:

Air emissions
Emission differentials
Emission reductions

Response: The proposed project would (when compared to current baseline) decrease the emissions of sulfur dioxide (SO₂), oxides of nitrogen (NO_x), and particulate matter less than 10 microns in diameter (PM₁₀) into the York air basin, while increasing the emissions of volatile organic compounds (VOCs) and carbon monoxide (CO). The total increase of pollutants (see Table 4.1-2a in the FEIS) covered by the National Ambient Air Quality Standards would be 312 tons/yr. This increase is based on actual or expected emissions, including offsets from P. H. Glatfelter Company Power Boiler No. 4. DOE has clarified this in the FEIS.

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I'm Connie Schmotzer, 2428
Schoolhouse Lane in Springs Grove
Township.

ROY EIGUREN:

Thank you.

CONNIE SCHMOTZER:

A couple of things. One, please
reference a letter in the appendix from
Heather Harvey, she's the AG (sic) Systems
Management team Leader from Allegheny
County National Forest. In her letter,
she recommends that there should be an
evaluation of the potential for impacts
from the airborne emissions at consider
distances.

Now, I think when it's that
high, 395 feet and the high dispersal
pollutants that will take place from this
plant, I feel that her recommendation is a
good one. I didn't see any reference to
action on her letter in the Environmental
Impact Statement. I'm wondering if there
has been any action on that, would you
please address if this evaluation has or
if it will take place.

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J-138/7

KEYWORDS:
Modeling

Response: An evaluation of the potential impacts from airborne emissions is presented in the EIS in Section 4.1.2. As described in Section 4.1.2.6, DOE used atmospheric dispersion models approved by the Environmental Protection Agency (EPA) and the Pennsylvania Department of Environmental Resources (PADER) to assess potential impacts at "considerable distances."

1 Also, since this is an impact
2 statement which will consider all the
3 environmental effects from the building of
4 this plant and this project, it would make
5 sense to consider the effects on the area
6 where the 900,000 tons of coal per year
7 would be mined.

8 This extensive mining will
9 certainly have an impact on the people and
10 the environment of the area around the
11 mines. And I ask that this is something
12 else that you consider when you're
13 considering the impact of the project.

14 And if I may take one minute
15 also to elucidate, going back to my
16 comment before about the VOCs and the
17 Ozone, to elucidate why the Ozone each
18 summer needs to be seriously addressed by
19 this impact statement. The Ozone standard
20 was originally set at .08 part per million
21 back, I think in 1978. It was set at that
22 level because it was known that lung
23 damage could occur there. The standard
24 was later changed, raised to .12 to
25 accommodate economic considerations.

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J-139/1

Response: Please see the responses to Comments D-139/24 and RW-12/22b.

KEYWORDS:

Coal mining

J-139/17

Response: Comment is noted. Please see the response to Comment J-81/7.

KEYWORDS:

Ozone

1 That means that we can legally
2 pollute up to that level, but we are
3 experiencing damages below those levels.
4 If we had to be in attainment of .08, we
5 would be exceeding many, many times during
6 the year, and we would be searching for
7 ways to reduce Ozone.

8 Ozone damages from plant crops
9 begin lower at .05 part per million. And
10 as the concentration goes up, increasing
11 plant damage to different crops occur.
12 Each summer here in York County, we have
13 University specialists diagnosing cases of
14 Ozone damage.

15 The farmers don't recognize it
16 because many other pathological damage, it
17 mimics disease. And until the farmer
18 sends in the plant material and has it
19 diagnosed for pathogens and doesn't find
20 any, there's often no way of knowing this
21 is Ozone damage. And only a trained
22 specialist can each summer pick it out.
23 Even extension agents have trouble looking
24 at it, so the university specialists do
25 catch it.

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1 So we can only imagine how many
2 are going undiagnosed. This is a problem
3 farmers can't deal with with a spray or,
4 you know, a cultural correction. They're
5 really pretty much stuck with the air
6 quality that they have. I know
7 it's very illusive and it's terribly hard
8 to try to figure out what's going to
9 happen from this plant. But it is also
10 terribly important to know. It's
11 important to the people in the area.

12 It's also important to the
13 agricultural industry who is really at the
14 mercy of the air quality here. We
15 documented nationwide, we're losing 25
16 percent of our crop yield to Ozone and
17 there are figures that say how much money
18 Congress saves each year.

19 In Pennsylvania, that has been
20 documented by folks at the Penn State.
21 And our regional agriculture industry and
22 our health are also very much dependent on
23 the decisions that are made by this board
24 and in the impact statement. And I ask
25 you, please if you're going to err

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J-141/24

KEYWORDS:
Conservatism

Response: The National Environmental Policy Act process tends to be a conservative, worst-case analysis of environmental and human health effects. There are many examples of this conservative approach in the EIS (e.g., environmental impact and health effects analyses based on maximum emissions; aquatic impacts analyzed for low-flow conditions).

Please see also the responses to Comments D-282/13, D-244/15, D-275/22, and D-289/6.

(continued)

1 anywhere, do it on the side of safety for
2 the health and welfare of the region.
3 Thanks.

4 ROY EIGUREN:

5 Thank you. I would ask members
6 of the audience who have not yet had the
7 opportunity to comment the first or second
8 time, if you'd like to do so, please
9 signify by raising your right hand.
10 Someone else here who would like to
11 comment at this point. If not, then what
12 we will do pursuant to our procedures is
13 we will go into recess until we either
14 have individuals who would like to comment
15 again or in the alternative, we have
16 others present themselves.

17 Yes, Mr. Klunk, would you like
18 to comment again? Okay. We'll let you do
19 that. This is Mr. Klunk again, we
20 already have his name and address.

21 JOHN KLUNK:

22 John Klunk, I just have a few
23 items I would like to touch on briefly.
24 I'd like to pass this letter to you that
25 my wife read and give that to you and have

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1 that entered into the record. Just a
2 couple items which I haven't typed yet
3 that come to mind. In the EIS, there are
4 a fair number of maps, those maps are not
5 very up to date.

6 For example, Hershey Road Bridge
7 was removed a number of years ago, and
8 that's indicated as still being there.
9 The lake uses down in the Glatfelter
10 Wastewater treatment area are indicated as
11 lagoons. Some of those are no longer
12 lagoons, they're ash landfills and ash
13 handling and processing areas, they
14 shouldn't be shown as lagoons anymore.

15 I'm curious about the Hershey
16 Road issues. I used to use Hershey Road
17 occasionally to go over toward Lincoln
18 Road, but now that bridge is gone, but
19 when I go down that way now, sometimes I
20 find that intersection is totally blocked
21 by trains, they're usually coal trains
22 waiting to go to the Glatfelter plant.

23 I'm just wondering, you know,
24 what kind of accumulation of coal trains
25 they might have if there's a significant

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J-143/6

Response: Figures in the FEIS have been corrected, as appropriate.

KEYWORDS:

Editorial

J-143/23

Response: As detailed in Figure 2.1-4, the proposed facility includes the addition of several rail spurs to the existing Yorkrail Mainline that would function as queuing space for rail traffic associated with the facility. Section 4.1.8 explains that both Conrail and CSX can accommodate the rail traffic generated by the facility at 100 percent of operating capacity. Furthermore, shifting cars at the proposed site would not result in blocking of grade crossings, reducing the potential for rail-auto accidents.

KEYWORDS:

Accidents
Trains
Transportation

1 number more coming in as they already
2 have. Another interesting note, it
3 probably doesn't make any difference to
4 you folks or not, but just in the last
5 couple months there have been several
6 accidents.

7 We had a train truck accident
8 crossing Thomasville. We had a coal car
9 spill coal into Codorus Creek. I didn't
10 see the site myself but I was aware that
11 it happened near Martin Road crossing.
12 Just a number of those things that I guess
13 happens when --- but I'd hate to think
14 about how much more of those kinds of
15 incidents we're going to have and how much
16 possibility there is for restricted access
17 of emergency vehicles when there's a
18 train, 100 coal car train blocking
19 something.

20 One other, visual receptors. I
21 found it pretty frustrating to understand
22 and define where those visual receptors
23 are and the photographs weren't of much
24 use, they were just photocopies.

25 What would be real meaningful

(continued)

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J-144/7

KEYWORDS:

Accidents
Trains
Transportation

Response: It is not expected that the proposed project would increase train traffic to the point of interfering with vehicular traffic flow, including emergency vehicles. Rail traffic would be infrequent (1 delivery every 4 to 5 days) and there would be a staging area at the proposed site that would minimize the blocking of grade crossings.

J-144/20

KEYWORDS:

Documentation
Visual impacts

Response: Figure 3.1-2 provides a map of the locations of the nine potentially sensitive visual receptors. Full-color photo reproductions of the photographs of Receptors 1-7 in Appendix C of the EIS are available for reference in Section 6.10 of the Environmental Information Volume, which is available in the public reading rooms (Appendix A). Due to cost considerations, full-color photo reproductions are not included in the FEIS.

1 would be a map showing those visual
2 receptors, I think that would be a lot
3 easier to interpret, you wouldn't need ---
4 you could cut the description quite a bit,
5 the text by just having the map and we
6 could see where they are.

7 Section --- this is a specific
8 comment on the draft EIS, section 3.1.5
9 biological resources on page 3-37 refers
10 to finding of studies done by Rockingham
11 Corp, Pennsylvania DER sites upstream and
12 downstream of the P.H. Glatfelter
13 indicating a very low number of taxa
14 (phonetic), six downstream of the Mill
15 Pond and Mills complex but upstream of the
16 wastewater outfall one.

17 For the benefit of anyone that's
18 in the audience that's not familiar with
19 taxa, those are stream dwelling insects,
20 although temperature increases from the
21 mill pond and contact cooling water
22 discharge and reduction in flow may be a
23 factor in this diminished water quality,
24 there must be other factors contributing
25 to the degree and condition of the

(continued)

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J-145/7

KEYWORDS:

Biodiversity
Stormwater runoff
Water quality

Response: The commenter is referring to biologic conditions in Codorus Creek downstream from the mill pond but upstream from P. H. Glatfelter Company's discharge. The Pennsylvania Department of Environmental Resources (PADER), in its Priority Water Body Survey Report (1987), concluded that waste from Spring Grove or P. H. Glatfelter Company was responsible for the observed loss of pollution-sensitive species in this section of the creek.

The Biodiversity Study for Codorus Creek and the Codorus Creek Water Resource Study investigated the affect of the proposed facility on the biological community of Codorus Creek. The major findings of these studies have been included in the EIS. Section 4.1.4.2.7 of the EIS analyzes the potential affect of the proposed facility on water quality, while Section 4.1.5.1 discusses the potential impacts to aquatic ecosystems. Briefly, the proposed facility has the potential to exacerbate those problems that are influenced by the concentration of dissolved solids, since concentrations would increase due to operation of the cooling tower (especially under low-flow conditions). However, some problems associated with temperature or biochemical oxygen demand (BOD) may potentially be alleviated since the proposed facility would improve these parameters. Dissolved oxygen concentration is a parameter of importance that affects the degree and condition of the biological community in the stream. Results indicate that dissolved oxygen concentrations should improve in Codorus Creek due to the reductions in heat load and BOD.

Regarding runoff from the proposed facility, stormwater runoff from the proposed York County Energy Partners, L.P. (YCEP) facility would be collected and conveyed through pipes to the P. H. Glatfelter Company's existing settling pond before ultimate discharge to mill pond (see Section 4.1.4.3, "Stormwater"). The P. H. Glatfelter Company would likely need a permit modification before accepting YCEP's runoff.

Regarding investigations into the cause of the observed biological impact and the potential for incremental impacts from the proposed project, the concerns of the commenter could be considered by PADER before it issued the required National Pollutant Discharge Elimination System (NPDES) stormwater discharge permit modification. Additionally, as described in Section 4.1.6.2 and Chapter 9, the proposed facility would develop a Spill Prevention Control and Countermeasures (SPCC) plan as required by EPA (40 CFR, Part 112). Engineering design measures outlined in this plan would be incorporated into the proposed facility. These regulatory requirements help minimize impacts and ensure that accidental spills are not discharged to Codorus Creek.

1 biological community.

2 This should be investigated to
3 determine if what is affecting that stream
4 would be exacerbated by the addition of
5 the YCEP facility with its impermeable
6 surfaces and potential for run off
7 containing accumulated airborne
8 contaminants and various other deposits,
9 spills, et cetera, which typically occur
10 at industrial facilities and in urban
11 areas.

12 The draft EIS appears to present
13 a lot of damaging evidence since 1970 from
14 a variety of sources, but the information
15 is fragmented and there are many
16 unsubstantiated statements, claims and
17 remarks. I believe I read this before, I
18 believe I must be finished. Thank you
19 very much.

20 ROY EIGUREN:

21 Thank you very much. We will
22 include for as an appendix --- excuse me,
23 include in the record that what's been
24 referred to by Mr. Klunk from Air Products
25 and the Environmental Energy Systems.

(continued)

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Doctor Clark.

DOCTOR CLARK:

Just a couple more comments, again, Richard Clark, North Codorus Township. A number of people have addressed the VOCs this afternoon and I would just like to reiterate, we feel that this is very, very important. I had mentioned earlier that Emission Control Measures relative to VOCs seem to be appropriate, I think that would be the best way to go.

A poor second would be offsets and with offsets, if the offsets are suggested as a possibility, I would urge that these offsets would have to be upwind of the site so that they would have real benefit with regard to the people of Spring Grove and further downwind.

I would also, along the lines of urging that there be a negative record of decision on this whole thing, it sounds like that's a very biased judgement made, perhaps in haste with insufficient information and so on and so forth, but I

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J-147/8

KEYWORDS:
Air emissions
VOCs

Response: Please see the response to Comment J-78/9. As explained in Section 4.1.2.3 of the EIS, offsets would not be required for VOCs since the projected emissions would be less than 50 tons/yr.

1 have spent lots of time going through the
2 22 volumes of information that were
3 available in the reading rooms, et cetera,
4 et cetera.

5 It seems to me, based on
6 traffic, based on pollution
7 considerations, based on a number of other
8 factors, there's plenty of justification
9 for a negative record of decision here or
10 ROD. I would ask whatever the conclusion
11 of the DOE is, that because of the
12 electrical needs, quote, end quote, and
13 various other factors, that the proponents
14 be granted absolutely no variances with
15 regard to any standards on the federal
16 level. And we've asked the DER do the
17 same thing on the State level.

18 If there was a crying need for
19 the electricity, that would be one thing,
20 but with the questionable need of the
21 electricity, at least on the local basis,
22 that's another matter, and as I say, that
23 seems to justify that absolutely no
24 variance is granted to the proponents for
25 any aspects.

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J-148/10

KEYWORDS:

Exceedances
Permits
Variances

Response: DOE does not have regulatory authority to issue permits for releases, discharges, or disposal of waste or byproducts from any facility. The industrial partner (York County Energy Partners, L.P.) is required to comply with all Federal and state laws, regulations, and orders, and with local ordinances during project construction and demonstration of the proposed facility, as outlined in its cooperative agreement with DOE.

J-148/18

KEYWORDS:

Need for power

Response: Please see the response to Comment D-83/5.

1 Again, I would also address the
2 noise. There's a statement in there
3 relative to there being no criteria
4 relative to noise, there are some federal
5 energy guidelines, which stipulate an
6 upper level of 55 decibels, I believe.
7 And in lieu of lack of criteria, these
8 other things could be invoked. One might
9 say, well, because of the ambient noise
10 levels there now, why worry.

11 Well, there's a couple reasons
12 for worrying. Number one, the proponents
13 where it's indicated in the DEIS that this
14 would be around the clock operation
15 throughout the year.

16 Also, we're talking about a
17 project if it's ever built that's
18 projected to go for 25 years. So based on
19 those conclusions, I would urge the DOE to
20 ignore the ambient levels and use the
21 federal energy guidelines as a cap for the
22 upper limits for noise. Thank you.

23 ROY EIGUREN:

24 Thank you. We've received from
25 Doctor Clark for inclusion into the

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J-149/4

KEYWORDS:
Guidelines
Noise

Response: There are no Federal guidelines or regulations which stipulate an upper level of 55 decibels for ambient community noise. In its 1974 document "Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety," the Environmental Protection Agency (EPA) derived an exterior day-night noise level of 55 decibels as adequate to allow 100 percent intelligibility of human speech indoors at normal distances and volumes. However, in the same document, EPA recognizes the contribution of existing noise in assessing the general community acceptance of intrusive noise.

In the absence of any applicable Federal, state, or local noise statutes or regulations, and because the proposed site is located in an area which already exceeds the generally used guideline of 55 dBA L_{DN} (day-night noise level), the criterion used in assessing noise from the proposed project is that the permanent, long-term changes to the existing noise environment should be limited to indiscernible sound levels. DOE believes that the project, as proposed, would generally meet this criterion.

1 record, the document entitled Design 230
2 Megawatt Reading. The document referred
3 to in his prior comments for the record.
4 We'll include this as a part of the
5 record. At this point, I'm going to ask
6 if there are individuals in the room who
7 have not yet had the opportunity to
8 comment that would like to.

9 We welcome you, sir. We noted
10 previously for the record that you've been
11 in session at the State Capitol. As a
12 consequence you were not able to be here
13 earlier, sir, but we welcome you here,
14 sir. Could we have your name and address
15 for the record, and please proceed with
16 your comments.

17 TODD PLATTS:

18 Sure. Thank you. Todd Platts,
19 445 Pine Avenue, Europe, 17403, and
20 representing 196th District and the State
21 House of Representatives here in
22 Pennsylvania. I appreciate the allowance
23 of the late arrival and I was glad the
24 message got to you. I also, before I
25 begin, some are follow up comments from

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1 our hearing in December and some, I think
2 maybe are new.

3 But I would express my
4 appreciation for this additional hearing
5 being scheduled and not having had a
6 chance to hear what previous remarks were
7 made, but I think, in the name of
8 fairness, and being as complete as
9 possible making a longer time period
10 available for public comments here in the
11 public hearings was wise. And I commend
12 the secretary and the deputy secretary for
13 there decision to do that.

14 The first point I'd like to
15 address is several places for the DEIS
16 there's references to this project being a
17 cost savings. And I find from both
18 comments of the EIS as well as from the
19 proponents of this project, Air Products,
20 that those numbers seem to be fairly
21 clearly based on figures from 1991 and '92
22 on avoiding costs of what was being
23 proposed back in '91 and '92 when Met-Ed
24 was soliciting bids through a competitive
25 bid process that was shortcut by Air

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1 Products by going to PUC and having the
2 PUC to order Met-Ed to enter into this
3 contract, but the information seems to be
4 based on those figures at that time and
5 not on 1995. And since you're conducting
6 your review in 1995, I think that any
7 information that's in your EIS that is
8 relevant to projected rate savings,
9 supposed rate savings to Met-Ed rate
10 payers because of this project that is
11 built, should be based on 1995
12 information.

13 I'll read to you just one brief
14 --- a couple paragraphs from an article
15 and this as we might have mentioned, I
16 don't think I've read into the record, I
17 know I didn't read into the record in
18 December, and there's an article that
19 appeared dated December 27th, 1994,
20 addressing the issues relating to Met-Ed.
21 And the second part of the Met-Ed is what
22 will they do if you don't build this
23 project. And again, throughout the
24 document, you say that if this project is
25 not built, Met-Ed will have to seek out

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J-152/5

KEYWORDS:

Electric utility rates
Met-Ed

Response: The Metropolitan Edison Company (Met-Ed) has recently reported that at current prices, electricity can be purchased on the open market for approximately 3 cents per kilowatt-hour (KWh) less than its [Met-Ed's] contracted price of 6.8 cents/KWh from the proposed York County Energy Partners, L.P. (YCEP) Cogeneration Facility. Met-Ed predicts that the average cost to its residential customers (using 500 KWh/month) due to these market changes would be \$2.35/month. Section 4.1.12.2 describing socioeconomic impacts has been modified in the FEIS to include a discussion of the changing economics in the electricity market. DOE notes, however, that the Pennsylvania Public Utility Commission has jurisdiction over local utility rate matters.

1 another project to be built, you use the
2 scenarios of the gas and coal fired
3 proposals. But you don't look at other
4 options such as Met-Ed would not seek
5 another plant to be built, but would
6 purchase power elsewhere. And reading
7 from the article, quote, one of the key
8 assumptions in the draft report is that
9 without the proposed new plant, local
10 electric rates could increase. But Met-Ed
11 officials says the assumption is not
12 necessarily right.

13 They say that federal officials
14 failed to account for changing market
15 forces when they assumed that Met-Ed
16 customers would have to pay for the
17 company to build new power plants to have
18 a private company build one if the plan by
19 developers of the York County Energy
20 Partners falls through.

21 In fact, Met-Ed spokeswoman
22 Judith Bothin (phonetic) said that Met-Ed
23 rates could be lower if the project is not
24 built. The utility to replace the
25 electricity you would have bought from the

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J-153/3

KEYWORDS:

Alternatives analysis

Response: DOE has modified the FEIS to include an additional alternative action - purchase of electricity on the open market through the Pennsylvania-New Jersey-Maryland (PJM) Interconnection Power Pool. This discussion may be found in Section 4.3.3 of the FEIS. Benefits include avoidance of both construction-related and operational environmental consequences. However, the additional generating capacity of the proposed Cogeneration Facility would not be available, net reductions in sulfur dioxide (SO₂), oxides of nitrogen (NO_x) and particulates (PM₁₀) in the York air basin due to curtailment of P.H. Glatfelter Company Power Boiler No. 4 would not be realized, and the proposed technology and cogeneration benefits would not be demonstrated at this time.

J-153/13

KEYWORDS:

Electric utility rates

Met-Ed

Response: Section 4.1.12.2 of the FEIS has been revised to discuss the changing electricity market. Please also see the responses to comments D-137/17, J-152/5, and J-153/3.

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proposed new plant with potentially cheaper electricity on the short term market or from other sources. She said, quote, what we looked for would be the most economical supplier at the time we need the energy. So based on those comments, part of the public record of the newspaper, and my reading it with you today, would request that any references to Met-Ed cost savings be based on current information, not 1991, 1992 information, because those comments certainly suggest, and my own knowledge, that I think that the kilowatt price and the contract start somewhere in the eight cents.

The kilowatt range for this contract and currently, I think is being able to be purchased for about four cents on the market, that's not a great savings to do with the eight cents, that's --- those are accurate numbers on Met-Ed statements, if Met-Ed statements are accurate, it seems to be doubling the cost of the power to Met-Ed.

The other comment that's in

(continued)

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J-154/13

Response: Please see the responses to Comments J-152/5 and J-153/3.

KEYWORDS:

Electric utility rates

Met-Ed

1 there is what they do if we don't build
2 this project, and their position is ---
3 possible position is to purchase the power
4 not to build another plant.

5 So I think that you're asked to
6 be complete, needs to go to Met-Ed, say,
7 you know, what are your projected cost
8 estimates of buying electricity if this
9 project is not built, and what do you
10 project your course of action to be if
11 this project is not built, build another
12 plant, have a company, private company
13 build another plant, or buy power on the
14 open market. Second one, I referenced in
15 the December hearing, some of my
16 colleagues from Harrisburg had talked
17 about brown-outs and the need for more
18 power. And I think I mentioned in brief
19 remarks at the end of the meeting that
20 that was --- that the finding of the State
21 House Committee was --- the solution was
22 not to build more plants, such as what's
23 being proposed here. And again want to
24 put into the representative claim which in
25 this state, the work of the

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1 Pennsylvania House of Representatives
2 Consumer Affairs Committee chaired by
3 David Wright and titled Report on the
4 Energy Emergency During the Week of
5 January 17th, 1994, that was referred to
6 by my other state house colleagues as
7 reasons you should do this, that you
8 should build this project.

9 Quoting from the report,
10 "although", quote, "although significant
11 amounts of generating capacity were
12 unavailable during the cold snap, the
13 committee believes that building of new
14 generating facilities is not the solution
15 to the insufficient capacity problem
16 experienced during the week of January
17 17th, 1994.

18 The consumer advocate, Irwin
19 Capowsky (phonetic) cautioned the
20 committee that the events of the week of
21 January 17th, 1994, do not warrant the
22 construction of large base load power
23 plants which would be built to provide
24 emergency service on a few coldest and
25 hottest days of the year. And again,

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J-156/9

KEYWORDS:
General

Response: DOE's need for the proposed Federal action is to demonstrate clean coal technology (a utility-scale circulating fluidized bed combustor as described in Chapter 2 of the EIS), and is not related to recent weather-related events. Nevertheless, the additional generating capacity of the proposed Cogeneration Facility would be beneficial in times of peak demand such as the extreme weather experienced in the eastern United States during the winter of 1994.

1 that's the findings of a state house
2 committee, not one individual, chaired by
3 not a member of my caucus and sense of
4 partisanship, so I give fair weight to the
5 recommendation of that committee. And
6 you're reviewing comments that that
7 brown-out justifies this plant.

8 Next point, which is going to be
9 posed more in a question or request for
10 action. As I requested, you go to Met-Ed
11 on the call savings and alternatives if
12 this plant isn't built, I would request
13 that you go to Met-Ed and to Air Products
14 as well as to your own department to
15 research an issue which relates to the
16 merits of the funding being provided.

17 A lot of my testimony last time
18 was on this project that would not warrant
19 75 million or more in federal funds
20 because it's already been proven
21 elsewhere, and I gave you evidence of
22 sites here in the United States and around
23 the world where this technology was being
24 promoted at this scale. Another evidence
25 of --- possible further evidence of why

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J-157/17

Response: Comment is noted. Please see the response to Comments D-37/16 and D-39/13.

KEYWORDS:

Need for project

1 this money is not warranted and because of
2 not having access to all the information
3 that would answer this question, I'm
4 asking you as part of your draft review,
5 to insure that you draft the EIS is full
6 and complete before it's finalized that
7 there seems to be some suggestion that Air
8 Products was going to build a plant of
9 this size with this technology at the West
10 Manchester Township site before they knew
11 about your money being available.

12 Whether it was the Foster
13 Wheeler technology, or a similar
14 technology, that's one of the questions I
15 have and don't have an answer for you.
16 And it may be that it was a completely
17 different technology. But the reason I
18 --- my concerns are raised that the
19 project sponsors were being --- planning
20 on going forward with a plant of this size
21 and this technology relates to several
22 documents.

23 When Met-Ed did not agree to
24 enter into a contract with Air Products
25 for the electricity, Air Products went to

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J-158/7

KEYWORDS:

Alternative technologies

Response: Air Products had proposed to Metropolitan Edison (Met-Ed) in August 1991 a pulverized coal/flue gas desulfurization facility in West Manchester Township. Only when the City of Tallahassee decided not to move forward with their project did Air Products change their project to the circulating fluidized boiler design.

1 the PUC and sought an order for that
2 action to occur. Now, I'm going to be
3 referencing some comments, the dates and
4 things were taken from a petition of Air
5 Products and Chemicals for a Declaratory
6 Order and Motion for Expedited Answers and
7 Commission Decision, that was submitted to
8 PUC November 8th, 1991.

9 In this Petition, Met-Ed or Air
10 Products delineated several issues, they
11 delineated that they had been negotiating
12 throughout 1991 with J. Baker company here
13 in West Manchester Township for a
14 cogeneration --- coal fire cogeneration
15 project. They delineated that, as of the
16 time of this petition, they have some
17 agreement in writing for the project ---
18 for a project of this type at J. Baker.

19 Let me give you some of the time
20 frames. Included in this petition is a
21 letter dated October 7th from Air Products
22 to Met-Ed.

23 DR. SUELLEN VAN OOTEGHEM:

24 What year?

25 TODD PLATTS:

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1 1991. October 7th, 1991. I'm
2 talking about --- it's a follow-up to a
3 September 6th, letter from Air Products,
4 September 6th, 1991, to Met-Ed about
5 proposal to --- and I'll read from this,
6 it says, as we stated to you in our letter
7 dated 6, September 1991, Air Products has
8 been actively developing a coal fired
9 cogeneration project in your county.

10 So they were engaged in some
11 activity and September 6th is relevant to
12 this issue, because in the same Petition,
13 Air Products states they didn't know what
14 availability of your money until September
15 16th, 1991.

16 So if they were pursuing a plan
17 of this size, 200 megawatts or more of
18 this technology, whether it was Foster
19 Wheeler Technology or not, but of this
20 type of technology which they used in the
21 other plants, it would show evidence that
22 this technology was going to be
23 commercialized without your money, that
24 they were already moving forward, they
25 already had an agreement with J. Baker,

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1 the steam recipient at the site, and they
2 were petitioning the PUC in their
3 September 6th, letter or making a
4 proposal to Met-Ed in their September 6th
5 letter to sell them electricity.
6 September 27th, 1991, Met-Ed --- or excuse
7 me, Air Products met with DOE officials to
8 discuss the possibility of getting the
9 grant that they had now learned of just
10 nine days --- or 11 days before.

11 In that meeting they talk about
12 a plant of 200 megawatt size using the
13 technology from Foster Wheeler because
14 that's what the grant was tied to. And
15 October 7th, then they came back with this
16 letter to Met-Ed, October 7th, '91 with
17 their letter to Met-Ed with this specific
18 proposal to build a coal fired circulating
19 fluidized technology at the J. Baker site
20 in order to get 75 million.

21 And the letter goes on to state
22 from what I quoted from before: Recently
23 Air Products was made aware of the
24 opportunity to bring approximately 75
25 million dollars in U.S. Department of

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1 Energy funding to this project, the one
2 they proposed to Met-Ed already, to the
3 benefit of the Met-Ed rate fares.

4 I run through all that time
5 frame, because if that project proposal,
6 September 6th, was of the same size, same
7 technology, it's clear evidence that
8 you're not an incentive --- this money, is
9 not an incentive to invest in this, it's a
10 reward.

11 It's also, if it's the case, and
12 that's why I'm asking you to review and
13 address in your final DEIS, if that's the
14 case that a CFB Technology plant is going
15 to be built at this site, at this site
16 before being made aware of the money, I
17 think it shows neglected duty by DOE
18 officials because the money's supposed to
19 be an incentive and you knew that they
20 were going for the project before they
21 even knew of it, and then you gave the
22 money anyways.

23 I don't know for certain that's
24 the case, I know there was a proposed
25 project, I know roughly the size, I don't

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J-162/4

Response: Comment is noted.

KEYWORDS:

Need for project

J-162/17

Response: Comment is noted.

KEYWORDS:

Need for project

NEPA

1 know for certain the technology that's
2 going to be in Met-Ed's hands and Air
3 Product's hands, and would request that
4 you seek that information from them, that
5 if you were to do a full draft, a full EIS
6 review, you'll need that information
7 because it's very relevant to the aspects
8 of the EIS which discuss --- which state
9 that this technology would not be ---
10 would otherwise be developed and pursued
11 in the commercial market place unless you
12 give this money, because if that evidence
13 or questions are, yes, it was going to be
14 done before they knew the money, those
15 statements are inaccurate.

16 Two last points I'm going to
17 make today before saving anything else for
18 my written comments, I found it
19 interesting, we saw an announcement from
20 our president, President Clinton about
21 extensive proposed cuts at the federal
22 level, and especially in the Department of
23 Energy, and specifically the clean coal
24 program. And immediately I was not
25 surprised, but kind of intrigued that the

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J-163/3

KEYWORDS

Government funds
Technology

Utilities are generally risk-averse to new technologies due to strict environmental regulations and the need to prove long-term reliability and flexibility in different applications (different locations, feedstocks, and system configurations). Until ACFB technology has been successfully demonstrated at utility scale, electric utilities, financiers, and regulators are not likely to consider the ACFB as an option to provide environmentally acceptable, coal-derived power. DOE notes that the Pennsylvania Public Utility Commission has expressly conditioned its order directing Metropolitan Edison Company to negotiate a long-term power purchase agreement with York County Energy Partners, L.P. on the availability of DOE funds. See Opinion and Order, Docket No. P-910549, dated November 27, 1991.

Please also see response to Comment D-39/13.

1 project that sponsored Air Products was
2 speaking on behalf of our U.S. Government
3 that this money was safe, nothing had even
4 gone to Congress, as you know, there's
5 been no deliberation by our federal
6 officials in Congress, House or Senate.

7 The ink's barely dry on the
8 general proposal in cuts, yet we have a
9 company official speaking and headline
10 this coal claim money won't be cut. You
11 read on and you find it's the company's
12 position or their understanding, I think
13 it would be wise, given those proposed
14 cuts, that this project epitomizes why the
15 clean coal project is being looked at to
16 cut, when it's just a specific project
17 that's included in the President's cut or
18 not.

19 In the proposal it should be,
20 because it epitomizes why the money
21 shouldn't be provided to the program in
22 general. If this is a --- this project
23 indicates how the program is run in that
24 your funding, the technology in the
25 surrounding world, other companies are

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J-164/7

Response: Comment is noted.

KEYWORDS:

Government funds

1 doing without taxpayer's funds, and that
2 relates to my final point.

3 In 1993 I wrote to Secretary of
4 Energy, Hazel O'Leary, and I referenced in
5 my letter, the 1991 General Accounting
6 Office publication, and because this is
7 new hearings, then we were addressing West
8 Manchester would include one paragraph
9 from that letter relating to the General
10 Accounting Office study. And again, this
11 is relevant, I believe to your EIS,
12 because of the merits of the funding and
13 what would happen is the fundings not
14 provided, and your argument in the EIS
15 that the funding has to be provided for
16 this technology. And I quote, in October
17 1991 GAO publication entitled,
18 Improvements Needed in DOE's Clean Coal
19 Technology program, discusses several
20 shortcomings of the CCT program.

21 Chapter three of this
22 publication focuses on the fact that
23 quote, DOE, and this is quoting from the
24 report, quote, "DOE selected some projects
25 that are demonstrating technologies that

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J-165/16

KEYWORDS:
Clean Coal Program
NEPA

Response: DOE disagreed with the General Accounting Office (GAO) findings and published a formal response to the GAO report (The Department of Energy's Response to the GAO Report Entitled "Improvements Needed in DOE's Clean Coal Technology Program" prepared by the Office of Fossil Energy, U.S. Department of Energy, Washington, DC 20585, January 1992). The Department addressed in detail each of the nine major conclusions drawn by the GAO reviewers. The 38-page document also described the program's successes to date in demonstrating advanced, environmentally clean, coal-based energy technologies. A copy of DOE's response to the GAO findings has been made available in the public reading rooms (Appendix A).

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might have been commercialized without Federal Assistance", unquote.

The report continues to say --- on to say that, quote, "set projects may not be the most effective use of federal funds," unquote. Chapter three recommends that to obtain maximum benefits from clean coal technology program funds, the clean coal technology program selection process should, quote, "include, as a factor in projection selection, decisions and project selection decisions and assessment of whether technology to be demonstrated is likely to be commercialized without federal assistance and avoid selecting technologies that could advance in the marketplace without federal funding."

That's why I bring that up. In your response to that GAO report you responded in a number of fashions, but one sentence in particular, quote, "it would be difficult, if not impossible, to make a realistic assessment of whether a project might proceed without federal funds." Well, I think that's not the case here. I

(continued)

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1 think here, based on what's being done
2 around the world and elsewhere in the
3 United States, this technology is moving
4 forward without federal funds. And based
5 on what the answers may or may not be to
6 what was proposed in West Manchester
7 before the availability of the federal
8 funds were known would certainly impact on
9 that. And that's why I requested you
10 pursue all those answers from both Met-Ed
11 and Air Products and ensure that your
12 final EIS is justified by 1995
13 information, is justified by information
14 from independent parties, not the
15 proponents of the project specifically
16 with the power needs and costs from Met-Ed
17 and make a decision that truly is in the
18 best interest of your accountings from the
19 health perspective, from the taxpayer
20 perspective, from the ratepayer
21 perspective and do what's best for the
22 people of this county, state and nation
23 and not necessarily what's best for
24 special interest in this instance, that
25 being Air Products.

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J-167/9

KEYWORDS:

Document review
NEPA

Response: In fulfilling its responsibilities to all of its stakeholders - including the American taxpayers, the DOE must balance the need to demonstrate new energy technology with the need to protect the environment. The National Environmental Policy Act (NEPA) provides the process for ensuring this balance of technological need and environmental concern within a framework of full public disclosure. In preparing the EIS for the proposed project, the DOE has solicited and received input from many sources, and has independently and objectively evaluated the information it received relative to the proposed project. The final EIS incorporates pertinent information received during the public comment period.

1 I appreciate the chance to speak
2 again tonight and look forward to
3 reviewing the answers to the questions
4 I've raised.

5 DR. VAN OOTEGHEM:

6 Representative Platts, could you
7 provide us with a copy of the Pennsylvania
8 Consumer Affairs document you've read
9 from?

10 TODD PLATTS:

11 I would have --- the one I have,
12 I kind of marked up, but I'll get you a
13 clean copy, no problem.

14 DR. VAN OOTEGHEM:

15 Would you please --- would you
16 show us where in the document you've
17 cited?

18 TODD PLATTS:

19 Sure.

20 DR. VAN OOTEGHEM:

21 Thank you. Appreciate it.

22 ROY L. EIGUREN:

23 Next commentator is Curvin F.
24 Tyson. Good evening, sir, if we could
25 have your name and address for the record,

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1 please.

2 CURVIN F. TYSON:

3 Okay. My name is Curvin F.
4 Tyson, 4983 North Sherman Street Extended,
5 Mount Wolfe, PA. ZIP Code 17347.

6 ROY L. EIGUREN:

7 Thank you.

8 CURVIN F. TYSON:

9 I'm actually a member of the
10 International Union 542 of Heavy Equipment
11 Operators. And I've worked actually in
12 all your power facilities in this area.
13 When they were built back in the 1960s, I
14 carried a dogamite (phonetic) license and
15 I helped do the presplitting and put the
16 diversionary canal in the Peach Bottom.
17 I've been a laborer, carpenter, an iron
18 worker and finally an operating engineer.
19 I used to work with Civil Engineers, I did
20 some surveying, too, in my lifetime.

21 Actually, I think it's something
22 that's actually going to move ahead.
23 Because I've worked on the power
24 facilities and when you been at the part
25 where you actually do the hands-on work

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1 with the thing you see how they actually
2 deteriorate over the years. And folks
3 figured these little brown outs was any
4 magnitude, I'd say in ten years, unless we
5 move ahead. And like I've worked at Peach
6 Bottom when we actually closed up a
7 facility similar to Muddy Run in 1980.

8 Now, they had a farm on the
9 other side, they've done tests where they
10 could actually build another power plant
11 similar to the one at Muddy Run and they
12 actually closed that up on account of DER
13 and Environmentalists and stuff like this
14 stuff. You know, this year I was up in
15 Alaska and seen a great amount of stuff,
16 and that's a lot of stuff going forward up
17 there. And really our government does
18 more to hurt our growth, I think, over the
19 last 10, 15 years than anybody else. I'd
20 like to see them look out for us. But
21 really if they don't really loosen some
22 things up, there's such a thing as being
23 too protective where you actually hurt the
24 welfare of a nation. I mean, you take a
25 look at the parks --- I'm talking about

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J-170/22

Response: Comment is noted.

KEYWORDS:
Environmental
protection

1 parks for you and the plants that we
2 actually depend on and the steel that's
3 deteriorating and other stuff for --- like
4 on PP&L, now, that's something that isn't
5 nuclear, but it's something that's ---
6 it's messy work that's going to have to be
7 done in there.

8 And the atomic plants,
9 eventually they're going to be shutting
10 down. And really if you don't soon do
11 something like Muddy Run and the thing
12 that you folks want to do with this
13 project --- like I say, you know, you look
14 at the little brown outs that you had,
15 it's got to be a magnitude such as the
16 folks don't realize. I mean, you reach
17 that point, it's too late to back up and
18 say, gee, we wish we would have kind of
19 worked along. You know, it's things that
20 can be done, but you can't really snowball
21 it and make it that it ain't going to
22 work. I worked on an atomic plant where
23 we actually took and pumped sealant into
24 the ground to seal it up to make it more
25 feasible. They figured you could get

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1 another 10, 15 years life out of it. But
2 this stuff is stuff that really you've got
3 to move forward with, because if you don't
4 move forward with it, the lights that you
5 got here tonight, you'd probably be
6 closing everything down, you know, at four
7 o'clock in the afternoon or 5:00. Because
8 when you ain't got the energy, you can't
9 use it. And your plants is at the part
10 where a lot of them takes a lot of messy
11 work and they do shutdowns --- where I
12 work on the shutdowns, I see the stuff
13 that's done. And really we've got to move
14 forward with the things.

15 And like with fundings with this
16 here, there's things --- monies that's
17 available actually through the unions,
18 like there's one out in the State of
19 Washington that I've worked with for a
20 Federal banking institute thing in
21 Philadelphia where there's money, it's
22 available, the only thing is lots of times
23 folks don't know that they're there. But
24 I know it's a lot of people in favor of,
25 it's a lot against it.

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J-172/1

Response: Comment is noted.

KEYWORDS:

Need for power

1 I sell real estate, I wind up
2 seeing a lot of things on both sides. I
3 got into that in '74 with my wife who
4 passed away with a kidney ailment so I
5 could be at home and raise the kids. So I
6 took and got my real estate license so I
7 could juggle my hours so I could raise
8 them, because they were five and six and a
9 half.

10 So that's my feelings and I
11 really feel it's something that is needed
12 and really I'd like to see it go forward.

13 ROY L. FIGUREN:

14 Thank you, sir. Our next
15 commentator is Lori Lears. Can we have
16 your name and address for the record,
17 please. And welcome.

18 LORI LEARS:

19 Okay. Hi, it's Lori Lears, and
20 my address is R.D. 1, Box 760, New
21 Freedom. I'm not going to talk long and
22 I'm not very scientific minded or
23 technical minded, so I really can't say I
24 understand all that big booklet at all.
25 But what I do understand is that cogen

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1 will have a direct impact on the
2 environment and also on the health of the
3 people in this area. There will be an
4 increase in air pollution, the particulate
5 matters especially is going to rise and
6 the American Medical Association says that
7 is one of the most harmful ones. It will
8 also have a detrimental effect on the land
9 and the waterways around the facility.
10 And particularly the waterways we need to
11 be concerned because those creeks all flow
12 down into the Chesapeake Bay. The plant
13 will also effect our health.

14 The American Medical
15 Association, the Lung Association are very
16 much opposed to this. They said people
17 with respiratory problems will be affected
18 and who knows the long-term effect on even
19 healthy people and children who's lungs
20 are not even developed fully. I feel like
21 we have a responsibility --- I'm a parent
22 and the teacher and I think we have a
23 responsibility to set an example for the
24 children that we don't base decisions
25 solely on money or on greed that we need

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J-174/2

Response: Comment is noted. Please see also the responses to Comments D-129/6 and D-243/7.

KEYWORDS:

Air emissions

Health effects

1 to show them we need to start taking care
2 of the environment and ourselves. And
3 we're the one that needs to set that
4 precedence for them. Thank you.

5 ROY L. EIGUREN:

6 Ladies and gentlemen, that
7 concludes a list of individuals who have
8 registered to comment this evening.
9 Again, I'm going to ask a question, are
10 those in the audience here who have not
11 yet had the chance to comment for the
12 first time who would like to do so? Yes,
13 sir. Welcome, if you could please step
14 forward to the microphone and give us
15 your name and address.

16 ROBERT ANDERSON:

17 My name is Robert Anderson, R.D.
18 2, Box 326, York, PA. I'm a retired dairy
19 farmer living about ten miles southeast of
20 the Glatfelter Plant. In 1968, it seems
21 as if the Board isn't considering one
22 thing, and that's water. We had a severe
23 drought in 1968. The only lake that was
24 available to the York Water Company was
25 Lake Williams. That was drawn down to a

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1 trickle. Water reserves were reserved
2 only for human consumption. The
3 restaurants did not even serve water
4 unless requested.

5 I think the Spring Grove area
6 and the Hanover area provide most of the
7 water for Lake Marburg through your winter
8 springs and your normal flowing springs.
9 The winter spring is defined as a spring
10 that normally just starts blowing around
11 November and continues on through to
12 April, May, depending on your rainfall.
13 During the summer the winter springs
14 usually dry up. And area and the revised
15 water for Lake Redman and Lake Williams
16 for the York Water Company usually
17 depended on what we called normal springs.

18 So I don't see how in the world
19 with a plant of this size that mother
20 nature ---there's no way in the world,
21 that I see it, is going to provide the
22 necessary water to maintain a plant of
23 this size. The drought of '68, York Water
24 Company had to haul, truck water from the
25 Susquehanna River at Wrightsville. They

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J-176/18

KEYWORDS:
Water use

Response: Please see the responses to Comments D-199/10, D-200/3, J-32/25, J-179/19, and W-JK-1/28aa. The water-supply studies indicate sufficient water is available, even during droughts. In the event of an extended severe drought, York County Energy Partners, L.P. (YCEP), (like the P. H. Glatfelter Company, from which YCEP would obtain its cooling water) would have to find alternate water sources or cease operations if the required minimum flow [7.62 cfs (4.92 mgd)] could not be maintained at the mill pond dam. Alternatively, P. H. Glatfelter Company would have to receive a variance from its permit before lowering Lake Marburg below 183-meter (600-foot) pool elevation in an effort to augment stream flow.

1 loaded their tanker trucks and they had a
2 train going on 24 hours a day, seven days
3 a week for about three weeks in 1967 to
4 provide just the necessary needs for the
5 York Water Company and whatever the
6 boroughs and townships require. And so I
7 think you should take into consideration
8 that there are going to be times of low
9 drought and low rainfall and so forth.
10 And I don't see how in the world that down
11 the road, with the population increasing,
12 that mother nature is going to provide the
13 necessary water for a plant of this size.

14 In closing, I wish DOE would
15 consider --- or Air Products would
16 consider the location of this plant either
17 closer to the coal source or located
18 somewhere along the Susquehanna River
19 where the necessary waters would be
20 sufficient. Thank you.

21 ROY L. EIGUREN:

22 Thank you. Do we have others in
23 the audience who've not yet had the chance
24 to comment for the first time that would
25 like to do so? Are there others who have

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J-177/6

Response: Comment is noted. Please see the response to J-176/18.

KEYWORDS:

Drought

J-177/14

KEYWORDS:

Site location
Water use

Response: In establishing the Clean Coal Technology (CCT) Program, Congress directed DOE to use a process to accomplish its goal that would result in a minimal role for the Federal government. Instead of requiring government ownership of demonstration projects, Congress provided for cost-sharing in projects sponsored by other parties, with provision for eventual repayment of the public funds invested. Therefore, rather than being responsible for the siting, construction, and operation of the projects, DOE has been placed in the more limited role of evaluating applications by project sponsors to determine if they meet the CCT program's goals. It is well established that an agency should take into account the needs and goals of the applicant in determining the scope of the EIS for the applicant's project. When an applicant's needs and goals are factored into the deliberations, a narrower scope of alternatives may emerge than would be the case if the agency is the proprietor, charged with full decision-making responsibilities for the project. The York County Energy Partners, L.P. (YCEP) project siting evaluation process, as described in Section 2.2.1.1 of the EIS, concluded that only the proposed site and the previously identified alternate site at West Manchester are feasible, and thus are the only alternatives that meet YCEP's needs. DOE has independently reviewed YCEP's project siting evaluation process, and has concluded that it reasonably focuses the alternatives to be considered in their EIS because there are no other sites that meet both DOE's purposes and the applicant's purposes.

In addition, as presented in Section 4.1.4.2.2 of the EIS, information suggests that there are no major water supply issues associated with the proposed project's location in North Codorus Township. The Susquehanna River Basin Commission (SRBC) has approved the consumptive use of up to 4.34 cfs (2.8 mgd) of water by the proposed project (as shown by the SRBC letter dated January 12, 1995, and contained in Appendix E of the FEIS). This approval is supportive of the finding contained in the EIS that there is sufficient capacity of surface water to satisfy the water requirements of the proposed action.

Please see also the responses to Comments D-37/16, D-121/14, and W-RJC-1/30m.

1 commented, would like to get up and do so
2 once again? There's one gentleman over
3 here (indicating). Yes, sir. Could I
4 have just your name again for the record?

5 CURVIN F. TYSON:

6 Okay. My name is Curvin Tyson.
7 For the record there, I'd like to actually
8 give you the name and address of that
9 lending institution that I've talked
10 about. It's Kennedy Associates, Inc.,
11 Investments Counselors, 2400 Financial
12 Center Building, Seattle, Washington, ZIP
13 Code, 98161. And Richard Winnigin
14 (phonetic) is the person that's in charge
15 of that.

16 So if you actually needed extra
17 funds, they would be available at that
18 part. And for the part of the water that
19 the gentlemen was talking about, I also
20 joined --- belong to the speleological
21 society where we used to go in and map
22 caves. So, really for the vapor company
23 there with the underground water that they
24 actually got with their quarry operation I
25 feel it could be quite sufficient, because

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1 actually they was even taking water out of
2 the quarry there that was on the east side
3 of York, because I'd actually helped
4 with actually moving the water at that
5 time. I was a little bit younger and
6 didn't have a family, it was something a
7 lot of folks just volunteered to help.

8 ROY L. EIGUREN:

9 Thank you, Mr. Tyson. Mr.
10 Klunk.

11 JOHN KLUNK:

12 Thank you. The gentlemen who
13 just spoke brought to my mind where the
14 plan to use Lake Marburg water is claimed
15 to not threaten that lake, but the data
16 that was based on was based on data from
17 1970 from when the lake was built to the
18 present.

19 And I believe the obvious thing
20 that really should be looked at is the
21 potential for a much more extended drought
22 such as the gentleman referred to that
23 occurred in '68, two years before that dam
24 was built, and the effect that would have
25 in the long term on Lake Marburg because

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J-179/19

KEYWORDS:

Consumptive effects
Drought
Water use

Response: The potential for an extended severe drought to affect a surface water supply is usually determined from stream flow histories and probabilistic studies of those histories (data). Such studies for Codorus Creek have been complicated by the existence of large impoundments and the practice of low-flow augmentation from impoundments. Both of these complicating factors have rendered stream flow data from recent years unsuitable for extrapolating the frequency, magnitude, and duration of rare (greater than 10-year recurrence interval) events.

Lake Marburg was not specifically designed for a particular drought situation. Rather, the dam was designed to enable the P. H. Glatfelter Company to release sufficient water to Codorus Creek, thereby augmenting low-flow, to provide an average daily inflow to mill pond of 50 cfs (32.5 mgd). During drought, the augmented flow would allow the P. H. Glatfelter Company to use 30 mgd in their operation and to spill 3.7 cfs (2.4 mgd) over the mill dam [Susquehanna River Basin Commission (SRBC) permit now requires a flow by of 7.62 cfs (4.93 mgd)]. The regulatory restriction on P. H. Glatfelter Company allows the company to draw down Lake Marburg to a pool elevation of 183 meters (600 feet), which is 7 meters (23 feet) below the normal pool elevation. During the 25 years that Lake Marburg has been in operation, the lowest pool elevation was 186 meters (609 feet), which occurred in 1991. It is reasonable to assume that the design and operation of Lake Marburg would allow sufficient flow augmentation under severe drought conditions.

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that is quite obviously where that comes from, even though Energy Partners may purchase allocation from the River Basin Commission at 14 cents a 1,000 gallons, about \$350 a day if they had to pay for it all, pretty cheap. That still means the water that they use would come from Lake Marburg.

So I think that really needs to be looked at further and for the potential for an extended drought, that should be included in the final plan. One other item, in your emissions something that's never talked about is the potential for burning other materials in this plant but coal and limestone. And I think this is a major oversight, because when this plant was sighted, the plant for West Manchester Township, they are so very proud this --- a big benefit of this technology was that it would burn a wide variety of fuels including trash. And as we know, Glatfelter Company has been applying --- has wanted to burn their wastewater treatment sludge for years. They just

(continued)

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J-180/16

KEYWORDS:

Fuel type
Incineration
Trash

Response: The only fuel that would be used by the proposed project during its demonstration phase would be bituminous coal (with propane used as a boiler start-up fuel). The emission limits outlined in the proposed project's Prevention of Significant Deterioration (PSD) air permit application are based on the use of bituminous coal. Any fuel usage other than that permitted by the PSD permit would not be legally allowed. If the industrial partner wished to utilize another fuel source, a modification to or reapplication for a PSD permit would be required and a public hearing conducted.

1 applied recently, there was a hearing on
2 that just Tuesday before the last hearings
3 here.

4 So certainly those emissions
5 figures should probably include the
6 contingency or the possibility that that's
7 what occurred there, that those Glatfelter
8 waste would be incinerated there. It's
9 certainly what they wanted to do. It's a
10 problem for them to deal with. The
11 Glatfelter Company is not inclined to
12 implement processes that reduce the volume
13 of waste, because the volume of waste that
14 they produce would be higher in
15 concentrations of toxics and hazardous
16 materials rendering those wastes much more
17 difficult to get around them.

18 So they have a --- they have a
19 tremendous volume of waste to dispose of.
20 They don't want to make a smaller volume,
21 because factor that I just stated, because
22 it makes it harder to dispose of yet.

23 So there's a very high
24 likelihood that they will want to
25 incinerate wastes and there's nothing to

(continued)

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1 stop the owner of that power plant from
2 bringing in waste to burn from elsewhere
3 in the future. This is supposed to be
4 here for 25 years, so let's take a look at
5 the long term and include that in the
6 final Environmental Impact Statement,
7 because you certainly know the potential
8 is there.

9 ROY L. EIGUREN:

10 Are there others who wish to
11 comment at this point? Yes, sir, at the
12 back of the room, if you'd please step
13 forward and give us your name again.

14 THOMAS RABER:

15 My name is Thomas Raber, I spoke
16 before, I'm not a very good speaker and I
17 forgot one thing that I did want to bring
18 out about the --- York Valley's considered
19 a high pollution area because they're
20 going to eventually mandate that we're
21 going to have to get our cars inspected
22 for pollutants to make them comply with
23 federal regulations for auto emissions.
24 How can we justify putting a plant in here
25 that's going to put more emissions in the

(continued)

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J-182/24

Response: Please see the response to Comment W-PNP-12/94c.

KEYWORDS:
Air emissions

1 York Valley when everybody in this room's
2 going to have to have their cars certified
3 and pay money to have them comply with the
4 emission regulations now and into the
5 future. That thing's been put on hold
6 temporarily, and we all know it's probably
7 going to get through eventually, and I
8 wouldn't be surprised to find out if YCEP
9 and Air Products didn't have something to
10 do with that thing being put on hold until
11 something else gets passed and approved.
12 But it's eventually going to happen. The
13 only comments I heard here in favor of
14 this are the guys who build and run this
15 plant, and I can understand their concerns
16 about it, but this plant affects, you
17 know, the entire area here, and again, I
18 hope it doesn't go through. Thank you for
19 my chance to comment again.

20 ROY L. EIGUREN:

21 Thank you. Are there others who
22 wish to comment? If not I will note for
23 the record that pursuant to public notice
24 for this public hearing being held on
25 January 18th, 1995, the hearing held for

(continued)

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1 the department as well as myself, the
2 Hearing Officer, will be here until the
3 hour of eight o'clock this evening, the
4 purpose of which is to receive comment.
5 What we will do is we will go into recess
6 in a moment, and if we do have individuals
7 who do present themselves before eight
8 o'clock and would like to go on the
9 record, we'll receive their comment.

10 I'd also like to note once again
11 that the comment period, the written
12 comment period in this particular
13 proceeding is open through January 31,
14 1995. So if you do have additional
15 comment you would like to present to the
16 Department, you may do so in writing, and
17 here at the registration desk to my right,
18 there is an address, it can be provided to
19 you as well as some cards actually
20 provided to you. You can write your
21 comments on them and those will be sent to
22 the Department.

23 Secondly, as I noted at the
24 beginning of the hearing, the final
25 Environmental Impact Statement currently

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1 is anticipated to be completed in March of
2 this year. And the Record of Decision
3 that will actually implement the
4 Department of Energy's decision, whatever
5 their decision may be is totally --- or is
6 anticipated to be concluded and released
7 in April of 1995. With that again, we
8 will be here until at least eight o'clock
9 this evening ready to receive comment.
10 And in the meantime, we'll be at recess.
11 Thank you very much.

12 SHORT RECESS TAKEN

13 ROY EIGUREN:

14 Ladies and gentlemen, if I could
15 have your attention very briefly, we'll go
16 back on the record. It's now
17 approximately one minute after 8:00 p.m.
18 on January the 18th, 1995, pursuant to
19 public notice, we have been here for the
20 purpose of receiving comment on this draft
21 Environmental Impact Statement. The
22 notice did provide that the hearing panel,
23 as well as myself, the Hearing Officer,
24 would be here until 8:00. Since we went
25 into recess, we did not have any

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individuals present themselves for the purpose of presenting comment, so with that, we're going to formally close the record and adjourn this public hearing. I've also been asked to announce by the Department that pursuant to the discretion built into the public notice, there will be no need to have a further continuation hearing tomorrow. There will not be further proceedings or further hearings here tomorrow.

So with that, we'll formally close the record and thank you all for coming, good night.

* * * * *

HEARING CONCLUDED AT 8:01 P.M.

* * * * *

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C E R T I F I C A T I O N

I hereby certify that the foregoing is a true and correct transcript of the notes taken by me at the hearing in this matter.

1-31-95
DATE

Christine Lundy-Fish
REPORTER

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