

TESTIMONY OF ROBERT CONCILUS, MD BEFORE PENNSYLVANIA'S
DEPARTMENT OF ENVIRONMENTAL PROTECTION CONCERNING THE AIR
QUALITY PERMIT FOR THE PROPOSED CRAWFORD RENEWABLE ENERGY
POWER PLANT

July 27, 2011

Robert Concilus, MD

I strongly oppose the construction of this power plant, which is proposed for construction about four miles from my family's house. The electricity is not needed in our region, as a significant percentage of Pennsylvania's generated electricity is already exported to other states. I strongly oppose the importation of huge quantities of used tires from other regions, states and even other countries into Crawford County for burning here when vast, clean burning natural gas reservoirs exist under the very land that will be used for constructing this plant.

Among the reasons for my opposition to this plant are the following issues that I request a response from the DEP:

1. The air quality in my neighborhood will be significantly degraded. Dioxins and other carcinogens, heavy metals and other pollutants, some carried in very small particles, will increase the incidence of cancer, lung disease and heart disease in our township and region. My property is adjoined by a dairy farm and the products of this and other farms could be affected. A number of dairies downwind from French incinerators were closed because of dioxin in the milk. Will the products of local farms be monitored for contamination?
2. Pennsylvania already ranks second in the U.S. in power plant air pollution even without this plant. The pollutants from the plant will be transported in the air to other states, especially New York. Will the emissions from the CRE plant be reported to the EPA for analysis according to the newly enacted Cross-State Air Pollution Rule?
3. The CRE site is next to the Conneaut Marsh, which is an Audubon's Society Important Birding Area, home to the states largest breeding population of bald eagles, a vital tributary of French Creek, the state's most diverse stream with both federally and state endangered aquatic species, and thousands of acres of State Gamelands. The intense air pollution to this biological gem will be injurious to all of these assets.

4. Since uncontrolled fire of storage tires is a risk for this plant, did DEP evaluate the risk of fire at CRE and review the circumstances of the fire at Westley, California that resulted in a disaster of major proportions?
5. The EPA is establishing new parameters for air emissions from power plants. Will the CRE plant meet these new standards especially the emission of mercury and other heavy metals as well as other air pollutants?
6. Since other facilities in Pennsylvania have not been closed when they have repeatedly exceeded their air emission limits, how can local citizens have confidence that the DEP will have the resources and the political will to enforce the standards of this air quality permit?
7. Are there any prescribed evaluation mechanism for the potential risks to the birds (especially bald eagles and nesting species of neotropical migratory birds) and aquatic species including the federally and state endangered species? Is there a plan to evaluate the fish caught in the Conneaut Marsh for dioxins, furans and heavy metals as it is an important fishery and the fish are eaten by many people in the local community? There are already recommendations for limiting the number of fish eaten in Pennsylvania because of heavy metal contamination. Can the DEP mandate monitoring of these species be financed by CRE?
8. The number of used tires available for incineration is limited and may only last a few years. Can the DEP request CRE to specify at this time the type of fuel that it will plan to replace the tires with?
9. Developing greenhouse gas regulations by the EPA require best available technology for power plants. Since natural gas is a much cleaner burning fuel, can incinerating car tires be construed as a best available technology? Will this plant meet EPA requirements of its greenhouse gas regulations?