

DEP Hearing July 27, 2011-07-27
Comments by Susan Mallick

Section 9 NON-ATTAINABLE NSR ANALYSIS

It is hard to imagine that with only a “virtually” renewable tire supply, that our community can benefit in the long run. Let’s look at economic benefits on p.5 about increasing the local tax base. We know that as a benefit of locating in the KOZ, this tire burn plant will not generate tax revenue in Crawford County until the year 2017, 5 ½ years from now. What if the business plan fails and we are left with a vacant plant and no jobs? This permit application is signed by a manager who, according to Washington Post article of October 17, 1997 was vice president of a company which went bankrupt. Would this have been before paying taxes? Would this happen in our community

In the meanwhile, we, as residents, would like to have information about the “economic” aspects of the business plan. Who would invest in the plant? Are government funds being used or will be sought in the future? What are the “pilot” agreements with the township, county, and school district? When would agreements take place – before or AFTER the permit is issued? What rights does the public have to know about this, in a timely fashion, especially as the rest of us pay taxes – right now

p.2

:Regarding nitrogen oxide “offsets”, let us be clear
While credits can be purchased to offset the total ozone transport region, we will STILL have an increase of 252 tons of NOx per year

p.5

A tire burning plant will not attract high tech industry, unless you consider a filling station high tech. How about the deleterious effect on our tourism industry and the decrease in property values in the vicinity of the plant

p.7 EPA’s view of TDF as a Fuel Source.

Notably absent in EPA’s assessment of TDF as a fuel source is any mention of applications. Small scale industrial operations such as cement kilns and heating plants may be well suited for using TDF, and may well offer improvements over their fossil fuel counterparts.

But this proposed tire burning plant is a major sink for tires.

P.6 Waste Tires: THE MATH

According to the EPA, about 300 million used tires are generated nationwide each year.

Of this number, about 12 million are generated in Pennsylvania.

CRE repeatedly states that the proposed facility will burn 800-900 tons of tires per day, 24/7, 360 or so days per year. Now if each tire weighs twenty pounds, this equates to about 90,000 tires per day. In a year then, approximately 30 million tires are required to feed the plant.

This is 2.5 times the entire output of used tires for the state of Pennsylvania, and about ten percent of the output of the entire United States.

Not all of these tires will be available, however, according to the application, as only tires made available through “managed programs” will be used.

It would appear that CRE is going to have a major problem in obtaining sufficient fuel to operate the plant on an ongoing basis. In today’s PC jargon, it is hard to see how this operation can be “sustainable” in the long run using TDF.

Since there is a serious question about the long term sustainability of such a large scale TDF operation, **approval of the facility should not be granted until the fuel source(s) are much more clearly ascertained.**