

# APALACHICOLA RIVERKEEPER®

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May 6, 2011

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AIR REGULATION

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RE: Biomass Plant Proposed in Gulf County, Florida

Dear Madams and Sirs:

This letter expresses our concerns regarding the proposed biomass plant in the Port St. Joe area. I would appreciate your consideration of this information and request an extension to the response period and a public multi-agency meeting with all parties to discuss the cumulative impacts on the Apalachicola River and Bay that will result from the overall operation of this facility, not to mention other parts of our region. These impacts will be significant and will cost our region both jobs and the health of our citizens in the future. Furthermore, the project is being considered by your individual agencies without regard to the cumulative impacts on our region by implementation of this project; the separate evaluations being made of these impacts will not recognize the jeopardy you will place on public health, ecological resources and the economic drivers that a comprehensive assessment of the cumulative impacts would expose. This letter is addressed to all of those agencies which we currently understand are involved in permitting this plant in an effort to make you aware of many of these hazards and outstanding questions.

It has been difficult to follow the complete permitting for the plant. Over the past two years, the project has changed names, applicants, and components of the plant making it almost impossible to consider and comment on what is actually proposed. The following information is what we have been able to decipher at this point.

In general our research indicates that the detrimental impacts on human health and environmental health – particularly air and water quality, make the proposed biomass plant inadvisable. Contamination from the plant in Gulf County would adversely affect the lives of residents of the surrounding counties as well as potentially contaminate surface water bodies that provide habitat for the fish and wildlife so important to sustaining our resource based fishing and ecotourism economies and quality of life in the Apalachicola River Basin. The source of the water for the operation of the plant is not clearly defined and may become a critical issue with the impacts of increasing water demand outside of the Florida boundaries.

More specifically, the following questions and concerns must be addressed:

**WATER CONSUMPTION:**

800,000 gallons/day of water will be withdrawn from the lower part of the Chipola River. This proposed withdrawal is being considered under a permit to the City of Port St. Joe. Consideration of the future water needs for developments already approved for the Port St. Joe area and the reduction of flows that feed and nourish Apalachicola Bay must be a consideration. The prudence of the loss of flow should be considered in light of the ongoing litigation between the States of Georgia, Florida and Alabama, climate change, reduction of flow to Apalachicola River and Bay, and loss of capacity to meet existing but undeveloped and future residential development.

**WASTEWATER DISPOSAL:**

It is our understanding that water withdrawn for use at the plant that is not evaporated will be discharged to the Port St. Joe wastewater treatment plant (WWTP). Information on the contaminants of the wastewater being discharged is not known at this time. The current permit for this facility requires the disposal to change its method of disposal to spray irrigation from its discharge as a point source to the White City canal. The type of constituents that will be discharged to the WWTP and ultimately to the spray irrigation field and the fate of those contaminants are a concern and should be carefully evaluated during permitting.

**STORMWATER DISPOSAL:**

A stormwater permit has been issued under the previous permitting rules that were antiquated and often resulted in impacts to the receiving water bodies, an unsustainable situation. Since the permit was issued, the design of the plant has been changed and the new stormwater treatment rules have taken place. The project should be reviewed under the new rules so that the discharge meets pre-development quantity, quality and peak discharge rates.

**AIR QUALITY IMPACTS:**

It is now common knowledge that the ultra-fine particulate matter emitted by this plant will cause significant health impacts, but current regulations do not address these impacts. The American Heart and Lung Association and American Cancer Society have all come out in opposition to the development of biomass plant because of human health impacts to children. While the current regulations do not recognize these particulates, it should be addressed in the permit knowing that this type of health hazard exists. A lack of consideration knowing these facts would seem to constitute a lack of concern and obligation to protect public health.

**HABITAT IMPACTS AND LONG -TERM CONVERSION OF HABITAT:**

The source of combustible material for the proposed plant includes *Miscanthus Giganteus* and *Arundo Donax*. These two plants are exotic invasive species and proliferate in moist wetlands such as the Apalachicola River floodplain. The Department of Agriculture and Consumer Services has issued approval for planting of *Arundo Donax* on approximately 1000 acres and it is our understanding that over 10,000 acres are proposed to be planted to feed this plant. This type of plant is totally unacceptable and threatens the very heart of the Apalachicola River and Bay's unique ecological system. This permit should be revoked immediately and any plants currently planted should be eradicated post haste. Australia and the State of California are experiencing the fallout from a similar poorly thought out decision to allow these types of invasive species. Planting these exotic plants such as *Arundo donax* proposed to fuel the plant in lieu of using trees threatens the native plants with its potential to spread into the Apalachicola floodplain and overtake the native species and can only benefit the few landowners that will profit from conversion of their lands between Blountstown to Port St. Joe from growing trees to these invasive species to feed the plant.

## HUMAN AND ENVIRONMENTAL HEALTH:

**On Human Health:** *Burning biomass emits large amounts of air pollutants including nitrogen oxides (NOx) and particulates (PM) that affect human health.*

- **Biomass burning emits more PM than coal fired plants; particulates are associated with asthma, heart disease, and cancer.** Florida DEP's and EPA's current regulations do not call for testing for some of these particulates; in particular the ultra-fine particulates.
- **Wood or trash burning biomass incinerators typically increase ground level ozone.** Burning biomass produces hundreds of tons of NOx and volatile organic compounds (VOCs), two ingredients of the ground-level ozone that *causes asthma in children and exacerbates other pulmonary and cardiac disease problems.*
- [Source: <http://www.nobiomassburn.org/2010/01/ecolaw-factsheet-biomass-is-not-clean-or-green>]

**On Environmental Health:** *Burning biomass to generate electricity is not carbon neutral. Under current or proposed laws, biomass burning will dramatically increase greenhouse gases. Emissions of CO2, NOx, and particulates [PM] are higher than coal per unit of power produced. The CO2 emissions from these plants are reported by EPA on e-grid as zero despite the following information:*

- **Carbon from biomass plants (called biogenic carbon) is the same as every other type of CO2 and causes just as much harm.**
- The consumption of trees required to fuel the biomass plant results in a significant rise in atmospheric CO2 levels. In April, 2009 the EPA reversed itself and invalidated the concept that biomass plants is carbon neutral by stating that:
  - **“Indeed, for a given amount of CO2 released today, about half will be taken up by the oceans and terrestrial vegetation over the next 30 years, a further 30 percent will be removed over a few centuries, and the remaining 20 percent will only slowly decay over time such that it will take many thousands of years to remove from the atmosphere.”**  
[Source: Federal Register, Vol 74, p 18899, 4/24/2009]
- **“Maintaining the exemption for CO2 wrongly treats all biomass sources as carbon neutral, even if the source involves clearing forests for electricity.** For example, the clearing of long-established forests to burn wood or to grow energy crops is counted as a 100% reduction in emissions despite causing large carbon emissions. Replacing fossil fuels with bioenergy does not by itself reduce carbon emissions.” [Searchinger, et.al., Science 326: 527, 2009]
- [Source: <http://www.nobiomassburn.org/2010/01/ecolaw-factsheet-biomass-is-not-clean-or-green>]

## ECONOMIC AND ENERGY BENEFITS:

Alternatives to meet our energy needs exist that are truly sustainable energy solutions such as wind and solar. There are clean alternative energy sources which require little or no water, including but not limited to:

- Installation of photovoltaic panels on individual homes can provide a significant source of power, encourage conservation of energy, reduce residence's power bill, and export energy from our area.
- A system called the SunCatcher consists of a solar concentrator in a dish structure that supports an array of curved glass mirrors. The SunCatcher mixes old technology with new design. By employing a system of mirrors attached to a parabolic dish to concentrate the sun's energy onto a high-efficiency Stirling Engine, each dish can generate up to 25,000 watts of power. More importantly, the SunCatcher requires no water for heating or cooling and a minimal amount of water is required to wash the mirrors. More information on this alternative can be found at:

[<http://cleantechnica.com/2009/08/25/worlds-most-efficient-solar-technology-coming-early-2010/>]

The project has applied for using over \$135,000,000 in public funding. Putting that amount of money into incentives for clean solar, wind or gas energy alternatives that would create a local industry should be considered if Gulf County wants to truly export renewable energy to the power grid and create local jobs and become a leader in North Florida for renewable energy development.

An efficient, clean power source will encourage ecotourism and second and retirement home development. Apalachicola Riverkeeper is working to encourage ecotourism as a significant industry for our area and believe that it would provide a better economic and healthier opportunity for the current and future residents of our area than a plant that will deter both retirement home construction and visitors. In addition, the opportunities of solar power are untapped and could offer significant economic benefits and environmental protection. A long term sustainable future is all of our goals now and for generations to come.

**CONCLUSION:**

The overall cumulative impacts of this plant will impact our region in many ways, that when consider as individual impacts measured by antiquated regulations may not seem so significant. The complete and cumulative impacts will be significant and potentially devastating to our area for the creation of 25 jobs that will displace hundreds of current traditional workers.

Such a project should not be allowed without at least a discussion among all those federal, state, and local agencies concerned. Please provide a joint meeting of all agencies involved in permitting and managing the resources of the Apalachicola Basin so that all these aspects of such a development are considered from a cumulative perspective.

Sincerely,



Dan Tonsmeire  
Apalachicola Riverkeeper

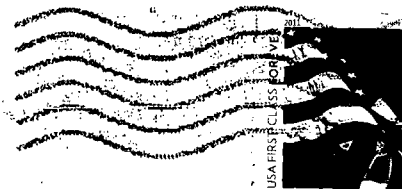


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