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AIR PROTECTION BRANCH

PLUMBERS AND PIPEFITTERS LOCAL UNION 72

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March 24, 2008

Heather Abrams
Georgia DNR
Environmental Protection Division
Air Protection Branch
4244 International Parkway
Suite 120
Atlanta, GA 30354

RE: Comments on Plant Washington Application #17924

Dear Ms. Abrams:

The United Association of Plumbers and Pipefitters Local #72 represents thousands of working men and women who many of whom live with their families, and work in the vicinity of the proposed Plant Washington coal fired power generation facility. UA #72 offers the following concerns regarding the air permit application for this plant.

UA 72 fully joins in the comments already submitted by a variety of concerned groups and citizens, including Greenlaw. UA 72 also wishes to emphasize areas of particular concern.

Fraternally Yours,

Richard L. Oliver
Business Manager
Local Union 72

THERE IS NO SUBSTITUTE FOR UNITED ASSOCIATION SKILLED CRAFTSMEN
Composed of journeymen and apprentices who have jurisdiction over every branch of
the plumbing and pipefitting industry.

INFERIOR TECHNOLOGY OFFERED

The proposed combustion technology is obsolete. Your agency should require the developer to justify why a IGCC facility is not proposed instead. IGCC plants produce less air pollution and use less water. The Clean Air Act legislative history plainly states that gasified coal technology should be required as part of the Top-down Best Available Control Technology analysis. The IGCC technology would also reduce toxic air emissions and therefore should be required under the North County PSD decision.

PM 2.5 AND LEAD

PM 2.5 is a recently regulated pollutant that is especially harmful because it is drawn deep into the lungs. A measurable fraction of PM 2.5 will be lead. Lung ailments from fine particulate and lead are of special concern to UA 72. Many of our current and past members are directly exposed to fine particulate and lead because welding and soldering are part of many of our jobs. Since we are exposed to these pollutants at work, we are especially resentful about being exposed to these pollutants in our homes and yards and while seeking recreation and leading our lives.

We are told that in most cases, power plant evaluations fail to properly model and measure either the existing levels of PM 2.5 and lead, or the predicted post-project levels of PM 2.5 and lead. We urge your agency to require extensive long-term pre-construction monitoring of PM 2.5 and lead airborne concentrations for this project, and to conduct a stringent LAER/BACT analysis of the appropriate pollution controls effective against these and other pollutants.

AIR TOXICS

As stated above, we have similar concerns about the wide variety of air toxics produced by coal combustion, including both metals and combustion products. We are told that pre-and-post project modeling and sampling neglects to properly measure the existing and predicted levels of these deadly contaminants. Coal typically contains trace amounts of metals and toxics. Published sources state that trace elements in PRB coal (one type of admitted feed coal), for instance, include twelve trace elements of environmental concerns: antimony, arsenic, beryllium, cadmium, cobalt, chromium, lead, manganese, mercury, nickel, selenium, and uranium. Of these, arsenic, mercury, and selenium are the trace elements that seem to be of the greatest environmental concern. Please see:

FACTORS CONTROLLING TRACE ELEMENTS OF ENVIRONMENTAL CONCERNS FOR POWDER RIVER BASIN COAL, WYOMING

STRICKER, Gary D., U.S. Geological Survey, Box 25046, MS 939, Denver Federal Center, Denver, CO 80225, gstricker@usgs.gov and FLORES, Romeo M., US Geol Survey, PO Box 25046, Denver, CO 80225-0046

The massive amounts of coal combusted in a power plant will produce significant and adverse levels of airborne metals and toxins in the power plant's vicinity. We urge your agency to give full attention to this issue.

GREENHOUSE GASSES

We understand that greenhouse gas emissions are not regulated as part of the pending permit process for this facility. We are told that recent court decisions allow agencies to regulate carbon dioxide as a pollutant, and we believe your agency should take all necessary regulatory actions necessary to declare CO2 a pollutant and regulate it appropriately. We are aware that many other states, including but not limited to Oregon and Washington, currently regulate CO2 emissions from new power plants and some other sources, and we urge Georgia to follow suit.