



December 13, 2010

Comments on Killen Biomass Air Permit

I am here on behalf of the Sierra Club Ohio Chapter. As the oldest and largest grassroots environmental organization in the state, our goal is to make sure that we voice the concerns of our members around the state against allowing an air permit to be awarded to the Killen biomass plant without further air testing and scrutiny. Because much of Southern Ohio including Adams County is in non-attainment for Particulate Matter (PM) 2.5, the Ohio EPA should not grant this permit without fully investigating how burning biomass in Southern Ohio could worsen the problem. Burning biomass actually produces larger amounts of particulate matter than burning coal.

PM 2.5 is a criteria pollutant under the Federal Clean Air Act and has numerous health impacts, including asthma and other respiratory ailments, heart conditions, and even premature death. According to the US EPA, PM 2.5 can be carried over long distances by air, often making rivers and streams acidic, damaging sensitive forests, depleting nutrients in soils, and negatively affecting the diversity of ecosystems. PM 2.5 also contributes to smog and can exacerbate global climate change.

The Killen plant has not disclosed which type and source of biomass it plans on burning which is problematic as well. Is Killen planning on burning trees? Trash? Agricultural Waste? Manure? Different types of biomass produce a myriad of different types and levels of pollutants. The people of Southern Ohio deserve to know what Killen intends to burn before an air permit is granted. We ask that the Ohio EPA demand Duke to disclose what type of biomass it intends to burn at the Killen facility so the environmental impacts associated with that fuel type could be fully understood and evaluated.

Finally, we would like to voice concerns over carbon monoxide (CO), because co-firing coal with biomass can result in significant increases of carbon monoxide pollution. According to the US EPA, carbon monoxide is poisonous, reducing oxygen delivery to the body's organs (like the heart and brain) and causing strain on the cardiovascular and central nervous systems. CO also contributes to smog. The Ohio EPA must not grant this permit without investigating the potential for increased carbon monoxide emissions and its impacts on public health.

Unfortunately, the Killen Air Permit application has created more questions than answers. We recommend further disclosure and investigation into these concerns and thank you for your time today.

Thank you,

CJ George
Sierra Club Ohio Chapter
Conservation Program Coordinator
Christian.george@sierraclub.org
614-461-0734 x301