

Marc Migliore
Region 5 Warrensburg Sub-Office
232 Golf Course Road
Warrensburg, NY 12885

December 22, 2011

Comments on Lehigh Northeast Cement Co. Air Permit (5 pages)

Dear Mr. Miglore:

We are writing to register our serious concerns about the DEC's tentative air emissions permit for the Lehigh Northeast Cement Co. plant in Glens Falls to enable it to burn "Enviro-Fuel Cubes." Our organizations are very concerned that the NYS DEC is considering this an environmentally sound proposal.

In order to provide more adequate time and opportunity to collect and analyze information pertinent to the air permit, we request a 90-day extension of the public comment period as well as a public hearing.

Among our initial concerns:

1. The test burn showed an increase in dioxin and furan, which are extremely toxic compounds, as well as chromium, lead and nickel. Dioxin is an extremely persistent chemical and a known human carcinogen. It depresses the immune system, causes behavioral and learning problems and disrupts the endocrine system, affecting sex hormones and reproductive functions.
2. Dioxin can travel long distances. It concentrates in milk and meat, major agricultural products in this rural Washington County. It also may be breathed in, especially in nanoparticles, the especially minute particulate that is not effectively collected on pollution control devices and has been strongly linked to heart and respiratory disease and increased mortality.

We do not take lightly any increase in the emissions of this very harmful substance.

These fuel cubes contain "various waste materials which may include "coated and laminated papers, wax cardboard, textiles, Styrofoam, plastics, all types of packaging materials, wood products and process out-throws from various manufacturing process applications," according to published articles accessed on the Internet. See the following links:

http://www.labelandnarrowweb.com/contents/view_features/2008-07-21/waste-recycling/
and <http://www.timesunion.com/local/article/Fuel-cubes-seen-as-alternative-to-coal-2293117.php>

3. We have a great many questions and concerns about the components of these cubes, including the use of polystyrene and other plastics and the actual amounts of these constituents in each cube, which apparently varies considerably from batch to batch.
4. Burning of wastes in a facility not designed to burn waste or such a heterogeneous feedstock also raises numerous red flags.
5. This cement plant, one of only three in the entire state, is located in a particularly heavily impacted area along the Hudson River corridor, making the issuing of this permit an environmental justice issue.

In this residential river valley, there are a number of other facilities in close proximity. For instance, two major emitters of air toxics within a mile away are Hudson Falls Wheelabrator, one of only ten MSW incinerators in the state, and Finch, Pruyn and Co.'s Glens Falls paper mill, which US EPA listed as the most polluting manufacturing plant in New York state in its 2010 report. In addition, in nearby Fort Edward, General Electric has a facility as well as the huge PCB dredging project. Other chemical and plastic plants are also within one to two miles of Lehigh.

6. According to the DEC, a Beneficial Use Determination should not adversely affect human health and safety, and the environment. We strongly question whether this indeed will be the case and intend to further investigate this question.

Thank you for your consideration.

Sincerely,

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