From: Paul Connett

To: <u>McGee Rayburn, Lauren - RD, Barnardsville, NC</u>

Subject: Professor Paul Connett"s comments on Arecibo incinerator

 Date:
 Wednesday, November 11, 2015 10:28:22 AM

 Attachments:
 connett.comments.eis.Arecibo.11-9-15.docx

Dear Lauren,

I would appreciate you confirming that you have received my commens attached.

Thank you.

Paul Connett, PhD

From: amaxey@no-burn.org on behalf of Ahmina Maxey
To: McGee Rayburn, Lauren - RD, Barnardsville, NC

Subject: GAIA comments concerning Arecibo Waste-to-Energy and Resource Recovery Project Draft EIS.

Date: Thursday, November 12, 2015 6:12:59 PM

Attachments: GAIA comments re USDA draft EIS Arecibo Energy Answer PR Nov 2015 final.pdf

November 12, 2015

Lauren McGee Rayburn Environmental Scientist U.S. Department of Agriculture Rural Utilities Service 84 Coxe Ave., Suite 1E, Ashville, North Carolina 28801

Dear Ms. Lauren McGee Rayburn,

Thank you for the opportunity to submit comments regarding the draft Environmental Impact Statement (EIS) prepared for the U.S. Department of Agriculture, Rural Utilities Service for the Arecibo Waste-to-Energy and Resource Recovery Project.

I have attached the Global Alliance for Incinerator Alternatives's (GAIA) comments to this email. Please acknowledge receipt, and thank you for your help.

All the best, Ahmina

--

Ahmina Maxey

Email: ahmina@no-burn.org

Cell: 510-463-1308



US & Canada Campaigns & Membership Coordinator GAIA: Global Alliance for Incinerator Alternatives

www.no-burn.org

From: Hannah Chang

To:McGee Rayburn, Lauren - RD, Barnardsville, NCSubject:Comments on Arecibo Incinerator Project DEISDate:Thursday, November 12, 2015 3:49:20 PM

Attachments: FINAL COMMENTS with all exhibits - reduced size.pdf

Dear Ms. Rayburn,

Attached please find comments on the Draft EIS for the Arecibo Incinerator Project submitted on behalf of Amigos del Río Guaynabo, Inc., Ciudadanos en Defensa del Ambiente, Comité Basura Cero Arecibo, Madres de Negro de Arecibo, and Sierra Club de Puerto Rico. A courtesy hard copy will follow. We would appreciate confirmation of receipt.

Thank you, Hannah

Hannah Chang
Staff Attorney
Earthjustice Northeast Office
48 Wall Street, 19th Floor
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T: 212.845.7382

F: 212.918.1556 earthjustice.org



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From: Myrna Conty

To: McGee Rayburn, Lauren - RD, Barnardsville, NC

Cc: <u>Hannah Chang</u>; <u>Ken Rumelt</u>; <u>Jonathan J. Smith</u>; <u>Teresa Sanchez Rodriguez</u>; <u>Amory A Ledyard</u>; <u>Ian R Peterson</u>;

Joseph R Simpson; EUNICE SANTANA MELECIO; Adriana Gonzalez; Inc Javier Biaggi; Pedro Saade; Dr. Angel

Gonzalez

Subject: Additional comments to DEIS Energy Answers, Myrna Conty.

Date: Thursday, November 12, 2015 11:53:54 AM
Attachments: Carta Sec USDA, QUERELLA RUS 28 SEPT 2015.pdf

Hello Laura,

My name is Myrna Conty. I am the coordinator of the Coalition of Organizations Against Incineration in Puerto Rico. I am also the president of Amigos del Río Guaynabo, Inc. an environmental group and part of this Coalition. My main comments will be sent by Earthjustice and the Environmental & Natural Resource Law Clinic of the University of Vermont Law School, who are representing my group.

I also wanted to make sure you received my formal complaint (attached to this email) to Tom Vilsack, Secretary of the United States Department of Agriculture, USDA, sent on September 28, 2015. In this letter I expressed my disappointment on the way that the public hearing held in Arecibo, Puerto Rico, on August 20, 2015 was conducted. This was a violation to our public participation, which is a requirement for the National Environmental Policy Act, NEPA, it should not be just a protocol. To this date, I have not received an official response to this complaint and I am very upset about the lack of responsibility of this agency. This is exactly the same way the public hearing was held.

I think RUS should not allow or give a loan or loan guarantee to Energy Answers to build an Incinerator in Arecibo. This is a waste of taxpayer's dollars and should be invested in Agricultural projects in Puerto Rico, zero waste, recycling and composting projects. It is contradictory to your agencie's mission and is putting at risk Puerto Rico's agriculture, public health and environment.

--

Gracias,

Myrna Conty Coordinadora Coalición Organizaciones Anti Incineración Valle Escondido # 9 Guaynabo, PR 00971-8000

Tel. 787-360-6358

Lauren McGee USDA/RUS 1400 Independence Avenue SW Room 2244-S, Stop 1571 Washington, DC 20250-1571

Subject: Comments on Draft EIS of July, 2015 on Energy Answers Arecibo Incineration Project

Dear Ms. McGee:

I analyzed the Arecibo Waste-to-Energy and Resources Recovery Project (Project) Environmental Impact Statement (EIS) in light of the comments I made by letter to Stephanie Strength on February 9, 2015 (enclosure 1) in response to the Public Scoping prior to the development of the EIS. It appears that the EIS only focuses on the benefits to the Project, while ignoring the costs to the public and the environment.

I find the EIS dated July 2015 to be incomplete and inadequate because it fails to disclose and recognize several major negative environmental impacts of the Project. Without such disclosures and discussion of ignored issues, it would appear impossible for the United States Department of Agriculture Rural Utilities Service (USDA RUS) to make a determination of no significant environmental impact of the Project without becoming embroiled in a cover-up of significant environmental impacts of the proposed action. Public health is at stake.

The EIS is focused on the local environmental impacts of the Project (a radius of 10 km around the property) as if this Project was designed to function in the context of such a restricted geographical area. In reality, the Project is insular in scope and effects, and its environmental impacts need to be addressed at both the local and insular (Island-wide) scales. The Project concentrates in one place the solid waste produced by about 34 municipalities (44 percent of all the Island municipalities) plus materials from other undisclosed locations. The materials to be incinerated comprise almost 60 percent of the total solid waste production in the Island. Also, pages 2-11 state that municipalities outside these 34 ones could also use the Project to dispose their solid waste material. Island-wide environmental impacts accrue in the process of concentrating the solid waste material, a process that significantly affect the strained finances of affected municipalities, their solid waste management programs, as well as the environmental impacts associated with moving solid waste materials from many municipalities of the Island to the incineration point. The energy and financial costs and environmental effects of moving solid waste materials and toxic ashes throughout the Island, which the EIS ignores, need to be subtracted from the small benefits of energy generation, which the EIS highlights.

The Project also impacts the prospects of recycling solid wastes at insular scale by diverting most of the solid waste production towards incineration. Moreover, the Project concentrates toxic pollutants and sea salts, that when returned to the environment, will disperse widely and affect larger areas than those disclosed in the EIS. For example, where in the Island will potentially toxic ash material be deposited? The disposition of toxic ashes is an Island-wide issue, not even addressed by the EIS (p 2-19).

The following discussion includes my reasoning for asserting that eight issues are ignored or poorly treated in the EIS, thus supporting my assertion that the July, 2015 EIS circulated to the public fails to satisfy the purposes for which an EIS is prepared in the first place. The eight issues are not in any order of importance but either individually, and certainly as a group, demonstrate that the proposed action cannot be justified on environmental grounds.

1. Undisclosed issues that must be disclosed to complete the EIS. The EIS fails to disclose three items that are essential for a complete environmental impact assessment. First, not all the sources of solid waste materials to be incinerated are listed. In addition to the municipal waste to be used by the Project, they will be accepting other materials such as automotive shredder residue, tire-derived fuel, processed urban wood waste, and other materials whose precedence, chemical composition, and quantity are not listed (pages 2-11 and 2-14). This is important because it affects the level and quality of emissions in gaseous and ash forms to be emitted by the Project. None of these additional sources are included in the EIS analysis. Clearly, incineration of novel materials not included in the EIS must be disclosed because of the additional types and quantities of emissions that will be added to the environment.

A second omission involves the identity of the municipalities from which solid waste material will be hauled to the Project. Figure 2.2 (pages 2-11) is misleading because it gives the impression that only those 34 municipalities highlighted in green will supply solid waste materials to the Project. In fact, the law that enabled the Project to acquire solid waste from municipalities involves municipalities in the whole Island. The identification of the geography from which solid wastes will be hauled to the Project is a critical item for assessing social justice (discussed below) and for estimating the costs and environmental impact of concentrating solid waste in one place. The EIS does not analyze these costs and impacts, and in so doing, misleads by ignoring the real environmental impacts of the Project.

The third omission is that the EIS does not disclose the location of the final deposition of toxic ash material from the Project. The EIS only states that toxic ash disposition will be "in an authorized landfill" (pages 2-19). This is a serious omission because solid toxic ash represents 20 percent of the

material processed at the incinerator (pages 2-19) or 453 tons per day (153,300 tons/yr or 132,860 tons/yr if recycling of materials are subtracted). Since these ashes are known to contain toxic materials, disclosing where they will be disposed is critical for the viability of the Project and the validity and credibility of the EIS. Given the problems that the Island is having at present with the disposal of ash from a coal-fired power plant, it behooves the government to inform the public about where in the crowded island this additional tonnage of toxic ash will be disposed of and the potential environmental impacts of transporting and disposing of these toxic materials. Moreover, hauling of this material generates thousands of trips by loaded trucks (pages 2-35) with potential impacts on safety, human health, infrastructure, traffic, energy consumption, gas emissions, accidents, etc. Appendix H of the EIS only considers traffic during construction of the proposed Project.

2. The erroneous use of concentration values to assess the environmental effects of toxic substances. The analysis of the effects of toxic substances produced by the Project in the form of solid or fly ash and gases emitted to the atmosphere are based on concentration data. The concentration of some (but not all¹) of the toxic substances resulting from incineration of solid waste is used to compare with their respective concentrations in different portions (soils, water, organisms) of the receiving ecological systems in the close vicinity of the Project. Typically, for those few materials so tested, the finding is that the concentrations in the by-products of incineration (toxic ash and gases) are several orders of magnitude lower than their concentration in the components of the receiving ecosystems. From these differences in concentration, proponents conclude that there are no ecological effects, given the low concentrations of these materials in ash and emitted gases.

There are two problems with the way this environmental impact was analyzed. First, not all of the few toxic pollutants disclosed in the EIS as emitted to the environment were tested, which means the analysis is incomplete. Thus, the USDA RUS will have no idea of which, how many, or how much toxic materials are being emitted to the environment at hurricane wind speeds of about 30 m/s, and have even less knowledge of the harm being done to people and natural systems. Second, the analysis assumes that dilution (or low concentration of substances) is the determinant of ecological effects. These determinations of concentration are based on models certified by the government for use in temperate zones but whose effectiveness in tropical conditions has not been established. For example, the model assumptions fail to capture the complexity of the topography, atmosphere, and ecological systems in the Arecibo region. At best, the

¹ Amazingly, 42 percent of the mass burned is not accounted for and of those pollutants that are disclosed, not all are regulated or considered in the EIS analysis.

model outputs are questionable while the ecological reasoning is wrong because ecological systems do not operate by dilution principles. They concentrate matter following laws of stoichiometry and conservation of matter and energy.

Ecological systems are known for their ability to concentrate substances as it is well known with DDT, radiation, and heavy metals. What is critical to know in order to make a determination of environmental impact is the load or absolute amount of material disposed to the environment, how that load is transported by food chains and ecological fluxes, and the locations in the environment where they accumulate (sinks). Because of the conservation of mass law, an ecological system may be exposed to low, but steady, concentrations of toxic substances, and over time concentrate them into levels with significant health and environmental effects.

The available loads of toxic substances emitted to the environment by the Project are summarized in Table 1. The values, expressed annually and over the 30 years of Project life, are high, and would be even higher if Project life is greater than 30 years (Project Life is not clear as pages 3-9, 3-28, and 3-75 indicate a 50 year Project Life). Nowhere in the EIS do the proponents disclose the eventual sinks of these materials and the effects they may have when concentrated (below I expand on this discussion). The important point here is that the EIS is incomplete by not analyzing the effects of all the toxic substances emitted to the environment, is inaccurate by using unrealistic models with a poor data base and no validation, and is wrong by using only concentration data to evaluate potential impacts of the proposed action. The cumulative impact of high loads of toxic materials (hundreds and thousands of tons in some cases) on agricultural fields, natural systems, and human communities is not disclosed.

3. The concentration of sea salts in sanitary waters. Brackish water will be used for cooling of the boilers. The EIS indicates that 2.1 million gallons per day of water with different levels of salinity (depending on the available freshwater runoff to dilute sea water) will be stored in a pond and used for plant cooling. The EIS does not explicitly discuss the ultimate disposition of this water into the environment, although on pages 3-36 it indicates that sanitary waters from the project will amount to 800,000 gallons per day, which is higher than the 100,000 gallons per day of potable water obtained from the Puerto Rico Aqueduct and Sewer Authority. The difference between the intake of water into the Project and the return to the environment must be accounted by evaporation of water during the cooling process. If this is the case, and assuming that water from the El Vigía pumping station has a salinity of 10 percent of seawater (Appendix N of the EIS states on page 11 that the salinity could vary between 17 and 41 percent seawater), one can estimate that every day the Project imports 23.8 tons of salt that need to be disposed. The salt imported to the site could reach over

100 tons per day if the brackish water is 41 percent of seawater. If that salt is added to the 800,000 gallons of sanitary water, the Project is basically returning sanitary waters with more salinity than seawater through the Island's sanitary system. The public infrastructure is not designed to handle so much salt. This environmental impact needs to be assessed. Better clarity is needed regarding the disposition of salt from the use of brackish water for the cooling of the incinerator.

There is also an impact on coastal wetlands by the diversion of this brackish water to the Project. The discussion of environmental effect of the diversion (pages 3-35) concludes that the effect is minimal because the amount of water extraction is small (2 to 7 percent of the water pumped at El Vigía). But the ecological effects of water diversion cannot be assessed by hydrological quantity alone; it requires consideration of changes in hydroperiod and water quality on affected ecosystems, which are not even identified in the EIS. If the Project changes water salinity, for example, it would have an undisclosed effect on estuarine productivity.

4. Excessive loads of toxic substances and acidification of the karst environment. Table 1 contains the quantities of toxic materials and acids emitted by the Project to the environment (pages 3-47 and 3-48). Data include the annual level of production of toxic materials, the production over the 30 years that the Project is operational, and the load of toxic materials per square kilometer of land around the Project.

I calculated the load dividing the total emission of toxic materials by the area influenced by the Project, which is assumed to be 157 $\mbox{km}^2. \ \mbox{In}$ appendices K and L of the EIS, it is stated that most of the emissions are dispersed on a 10 km radius around the incinerator (314 km²). However, the EIS argues that because of wind direction, about half of that area will not be exposed to toxic material loading. That means that the emissions will be even more concentrated than if all 314 km² were exposed to the toxic materials. In reality, the area affected by toxic emissions from the Project will be larger during periods of drought, and smaller during periods of heavy rain. Rainfall will precipitate toxic materials near the Project, thus overloading those ecological or human settlements nearby. During periods of drought, toxic materials will be transported longer distances than the 10 km assumed by the EIS. Wind direction and the time that wind remains in particular trajectories also influence the area to be affected by the toxic emissions from the Project but the wind data in the EIS is not sufficient to reach reliable conclusions.

Because the EIS fails to consider the impacts of loads of toxic substances on people, ecosystems, and wildlife, and relies instead on concentration values (discussed above), none of the potential ecological impacts are properly addressed by the EIS. The burden of proof is on the proponent and

sponsoring federal agency, and so, I will only provide two examples of how inadequate the EIS is in its evaluation of the environmental impacts of the emission of toxic substances by the Project.

First, the levels of the cumulative loads of toxic substances over the landscape are significantly large on an annual and a geographic basis (Table 1). The EIS assumes that all these materials "evaporate" in the atmosphere, soil, and waters around Arecibo, Puerto Rico. No effort is made to assess where this tonnage is accumulating, its final environmental sink, or the effects it has as it travels through food chains, plant and animal populations, through human settlements, sediments of wetlands or rivers and underground aquifers. What are the effects of toxic loads in the milk industry, given that karst systems concentrate organic matter and chemical substances in soils and plants that lead to cows, milk, and people? The EIS needs to produce maps of the northern region of Puerto Rico with spatial data of the distribution of toxic materials that are emitted through the stacks of the Project.

Second, consider only the effect of emitted acids on the karst ecosystem. The tonnage of acid production by the Project shown in Table 1² adds up to over 1,466 Mg of acid per year, or a load of 9.34 Mg/km².year, which translates to 280 Mg/km² over the 30-year period of Project operations. This is a level of acidity sufficient to dissolve karst rocks. In short, the project produces acids in quantities that accelerate the erosion of the karst. Acids change the chemistry of karst soils and thus could also affect the productivity of the karst systems. Water quality could also be affected and the proximity of the water sources for the San Juan Metropolitan Area is another concern. With so much acid production by this Project, the public should be informed of the potential effects this will have on the landscape, its ecosystems, water resources, and public infrastructure. The EIS simply ignores all these potential effects of the Project.

5. The potential effects of sea level rise on flooding levels. When project consultants evaluated the ground water at the Project site for potential use for cooling, they found brackish water with 50 percent seawater strength at the site (p 2-6). This indicates the presence of the ocean below the low reaches of the floodplain where the Project is located. Nearby canals are lined with mangroves, also indicate the presence of seawater and tides. To overcome the expected floods of the site (located at 1 to 7.5 m above mean sea level (msl), page 2-9), the proponent intends to raise the site to 6.3 meters above msl (page 3-9), or about 50 cm higher than the expected high water from the 100-yr flood at the site (4.8 to 5.8 m above msl in FEMA Flood Zone Map; 5.27 m above msl in a model output on page 3-27). During Hurricane Georges, floodwaters at "the plant site" (Central Cambalache?)

 $^{^2}$ Excluding the acid produced by 924,750 Mg of CO_2/yr produced by the Project

ranged from 5.2 to 7.3 m above msl (page 3-25). The question from investors should be: is a 50 cm difference between high floodwater and site elevation sufficient to protect the Project investment? The margin of error is really small!

Sea level is already increasing at a rapid rate in the north coast of Puerto Rico, and is expected to rise about 22 cm from current levels in the next 50 years (based on actual measurements in San Juan, PR). One would expect a backwater effect in the floodplain where the Project is located due to higher sea levels. Increased sea level will also raise the already salty and close to the surface water table of the floodplain (0.6 to 1.5 meters above msl in elevation at the site, page 3-18). Moreover, the maps used in the EIS use a msl estimate that is lower than the present one because they are based on an old datum not corrected for current sea level. Therefore, the elevations in these maps give a false illusion of land elevation relative to sea level.

The issue of sea level increase and its potential effect on the depth of floodwaters should be a real concern for such a high investment located in a site with such a vulnerability to flooding. Centimeter-level differences are determining whether the elevated base of the project will flood or not, in a future scenario of extreme rainfall events and higher sea levels. Moreover, the location of the site relative to geotechnical considerations and required depth to sink pilings for building stability, further enhance the vulnerable location for this Project (Appendix A of the EIS).

6. Effects of the Project on social justice. Appendix J of the EIS limits the Environmental Justice analysis to a single community adjacent to the Project, and finding that their economic situation is better than average, concludes that no effect on social justice can be attributed to the Project. This self-serving approach and conclusion ignores the fact that the scope of the Project transcends the local community and reaches most of the Island involved in supplying solid waste materials, losing the possibility of a recycling program, being exposed to toxic air and toxic ashes, or being affected by increased loads of toxic chemicals in their environment. The social justice issue hinges on whether particular social groups are disproportionally affected by the action proposed by the Project. The EIS fails in identifying the affected population by conducting a very narrow analysis.

There is enormous opposition to this Project among the public based on the lack of disclosure of all the hazards to humans and the environment and the few opportunities that the public has had to participate and learn about all the ramifications of the proposed Project. The average person affected by the Project has no means to understand the hazards to which they are being exposed because the EIS is written in a foreign technical language with

technical information presented in an unfriendly way even to subject specialists.

Moreover, the Commonwealth Law that forces municipalities to pay for, and provide all of their solid waste materials to the Project, transfers to the public the cost of the delivery of solid waste materials to the Project. The costs to municipalities are much higher than what they pay today, and most of these municipalities are rural and poor. These are social justice issues not disclosed in the EIS that deserve attention, particularly when the proponent agency is a USDA agency serving rural communities. This Project uses public funds to make a profit while causing rural communities to subsidize the operation through increased costs of hauling and processing solid wastes and risking their health by absorbing the environmental impacts. The effects on Municipal finances and services to people are subjects of social justice not covered by the EIS.

- 7. Effects of the Project on the solid waste recycling program of the Island. The EIS explains very well the failure of the Commonwealth's recycling program and its lack of attainment. However, the EIS fails to disclose the progress being made by many sectors of society, including municipalities, in the recycling of solid waste materials. By its sheer size, the Project will have impacts on these initiatives and in the prospects of success for recycling in Puerto Rico as a whole. By burning most of the solid waste generated in the island, this Project forecloses any possibilities of recycling, including the jobs and economic potential of that enterprise. Losses to agriculture also affect economic development opportunities in rural areas. The discussion of alternatives to incineration fails to consider recycling as an alternative, thus displaying another inadequacy of the EIS.
- 8. Island-wide effects of the Project on solid waste management. Forcing municipal governments to provide solid waste materials to the Project, hauling garbage from all directions of the island into one place and returning toxic ashes back to undisclosed locations, and eliminating the possibilities of recycling alters the whole fabric and future of solid waste management in Puerto Rico. The EIS is inadequate in discussing its impact on the whole solid waste management industry. Would smaller and more regional units of incineration coupled to recycling best serve the Island as an alternative to the Project as was anticipated in the approved 25-year plan of the Commonwealth Solid Waste Management Authority? Alternatives to this Project are poorly developed in the EIS.

Ariel E. Lugo Támesis 1528

Río Piedras, PR. 00926

Enclosures (2) Cc Pedro Saade

exceed the level of "significant emission rate". Data are from pages 3-47 and 3-48 of the EIS. Emissions are projected to 30 years of plant operation and loads estimated using an affected area of $157~\mathrm{km}^2$ (see text for discussion). There are significant discrepancies Table 1. Emission rates of hazardous pollutants emited by the Arecibo incinerator in metric tons (Mg) and the factor by which they between the emission numbers in the EIS and those in its Appendix C, page 15.

	Fmission Rato	Annual Emission /	Mg of Emiss	Mg of Emission and Load	
Hazardous Pollutant	(Mg/vr)	Significant	per km ²	per km² Over 30 yr	Annual Load
	() () ())	Emission	Emission	Load	(kg/km²)
*Carbon monoxide	702	3.57	21,060	134.140	4471 3
*Nitrogen oxides	353	8.8	10,590	67.452	7348 4
*Sulfur dioxide	260	6.5	7 800	70.52	1656 1
Particulate matter (filterable)	51.7	2.07	1 551	75.062	1,050,1
Particulate matter < 10 microns		ì	1,00,1	9.07	329.3
(filterable and condensable)	104	6.93	3,120	19.873	662.4
Particulate matter < 2.5 microns	į				
(filterable and condensable)	06	6	2,700	17.197	573.2
Volitile organic as precursor of ozone	52.4	1.31	1 572	10.012	0 222
Lead	70.0	(L	1,0,1	CTO.01	222.0
Borvins	U.SI	0.52	9.3	0.029	2.0
Del yildili Nistori	0.0032	∞	0.1	0.00061	0.020
Nickel 6 - :	0.024	NR	0.7	0.00459	0.153
Cadmium	0.041	NR	1.2	0.00783	0.261
Chromium 2: -1-	0.016	NR	0.5	0.00306	0.102
ZINK	0.93	NR	27.9	0.178	5.9
Amonnia	28.8	NR	864	5.503	183.4
*Fluorides	10.8	3.6	324	2.064	68.8
Wercuty	0.0692	0.69	2.1	0.013	0.441
*Sulturic acid	16.6	2.37	498	3.172	105.7
*Hydrogen chloride	124	N.	3,720	23.694	789.8

Municipal waste combustor organics measured as 2,3,7,8- Tetrachlorobenzodioxin	4.07E-05	11.63	1.22E-03	0.0000078	0.0003
Municipal waste combustor metals measured as particulate matter *Municipal waste combustor acid gases	42.8	2.85	1,284	8.178	272.6
measured as sulfur dioxide and hydrogen chloride	415	10.38	12,450	79.299	2643.3
	0.002	8	90.0	0.00038	0.013

*Acids or lead to acids when mixed with water or oxygen in the case of carbon monoxide. Acid produced by 924,750 Mg ${
m CO}_2/{
m yr}$ is not included.

Stephanie Strength USDA/RUS 1400 Independence Avenue SW Room 2244-S, Stop 1571 Washington DC 20250-1571



Subject: Public Scoping for RUS Environmental Impact Statement Related to Energy Answers Arecibo Incineration Project (Project)

Dear Ms. Strength:

I am happy to see the federal government involved with the Energy Answers Arecibo Incineration Project (Project) because up to this time the formal evaluation of the Project has not been transparent, public involvement has been curtailed by the lack of public disclosure of vital aspects of the proposal, and the result has been the perception that the outcome of this proposal has already been decided in favor of the Project regardless of social and environmental consequences. Your federal agency has an opportunity to take a fresh and comprehensive look at the elements of the Project and decide if they are or not sound and beneficial or not for the public good.

Regarding your agency involvement in this issue, I am curious to know if you view this Project as a rural enterprise given that Puerto Rico is mostly and urban island and the Project serves an urban population, not a rural one. Moreover, is your investment for electric power appropriate through an energy inefficient solid waste approach? Particularly considering that Puerto Rico has an excess of power production and with declining population may require less in the future. In short, does this Project offer a compelling economic case for USDA in light of the social and environmental costs of the proposal? How strong is the proposed action when compared with the no-action alternative? We don't know this because the environmental review to date has apparently assumed that this Project is a done deal and thus, alternative actions such as the no-action alternative have been either ignored or poorly developed.

Five issues (in bold) that must be addressed in the analysis of this Project are:

The changing social conditions in the Island. The Project's Environmental Impact Statement (EIS) contains obsolete population estimates for Puerto Rico because the current population migration to the United States mainland with subsequent reduction in population was not included, nor were the implications of this population reduction to the social and economic conditions affecting the Project including the production of solid waste materials. Moreover, the age of the population and the type of economic activity that it engages on have changed

dramatically in the past decade. Given the nature of the Project, it is imperative that its planning and viability be determined by realistic population estimates, whose trends today are moving in the opposite direction to those anticipated by earlier Project documentation. A 500,000 people swing in population results in many tons of solid waste not produced everyday and the gap between reality and the Project estimates is wider because they projected increases while the population actually decreased.

Equally important for the analysis of the Project is the recent demonstration of the viability of profitable recycling alternatives for dealing with the Island's solid waste problem. The municipalities of Carolina and Guaynabo, to name two, export recycled materials from solid waste, make a profit, and provide jobs to people. This alternative to the Project requires analysis in terms of future competition for solid waste (which affects Project viability) as well as an alternate action to the Project. In the analysis of alternatives to the Project, new and accurate information will be needed concerning the composition of the solid waste produced in the Island. Such information not only helps in the evaluation of alternative uses of materials (such as recycling) but also will inform about the types materials (including toxic ones) that will be concentrated by the Project residual ashes and atmospheric emissions.

The vulnerability of the selected site for this proposal. The selected site is in the floodplain of the Río Grande de Arecibo, a river that can occupy the whole floodplain when it reaches flood stage. This particular location is also close to valuable natural resources such as rich agricultural soils, highly productive estuaries, magnificent karst forests and karst topography, and beautiful vistas of a particularly attractive part of Puerto Rico. To protect the site from the 100-year flood, the Project intends to isolate the site from the rest of the floodway. To do so they must lower the topographic elevation between the site and the river channel. This is expected to provide more space for floodwater discharge during floods. This action will likely alter or eliminate a natural river meander, which requires a justification and environmental impact analysis. The proponent wants to change the topography and functioning of public lands for its private economic benefit and the public deserves a cost/benefit analysis for such a tradeoff.

Assuming the proponent changes the topography to isolate the site from the river's floodway, the rest of the floodplain should be under water after the 100-year flood. The Project will not flood, assuming its topography is above 5.2 m elevation above mean sea level. What is not clear is if the Project will be able to function under those conditions. If all access roads are flooded, how will the Project get its raw materials? Considering that this activity is designed to serve not only the surrounding region but also most of the Island, it would appear that a vital cog of the solid waste infrastructure of Puerto Rico is being located at a vulnerable site during frequent periods of floods and hurricanes. This is in spite of a Presidential Executive Order and numerous local and federal laws and regulations that discourage these kinds of locations for developments.

Also, if 100-year flood levels reach 5.2 m at the site, and the site's topographic elevation ranges from about 3.0 to 4.6 m, how will the site be protected from flooding? Information about the history of flooding at the site could be helpful for clarifying whether site will flood or not after the implementation of the proposed topographic leveling east of the Project. It would also be useful to the public if the topographic maps in the documents available for review could be drawn in a way that the information about elevations on the maps could be read. Another related question is the functioning of retention ponds, which will be dug to 2 m depth. How effective are these ponds if the water table rises above the ponds during floods? Documents should include a simple diagram that includes the current and future topography of the site, variation of water table levels, and changes in flood heights with different storms intensities. This information is scattered and hidden in technical detail (topographic maps in documents have small letters and do not identify clearly the elevation within the site). Therefore, it is difficult to understand how the site and its infrastructure will perform during extreme floods.

Potential incompatibilities among the proposed action and affected social and ecological systems. The Project is designed to process a significant fraction of the solid waste generated in the Island. The Project design capacity is almost double the capacity of solid waste production of Puerto Rico's northwest, which means that a lot of solid waste will have to come from outside the region. Recovery of potentially recyclable materials among the solid waste received in the Project will be minimal. Thus, the Project pretty much closes out the possibility of alternative approaches to solid waste management including the possibility of a recycling program for Puerto Rico. If true, this statement requires serious consideration. If the Arecibo Project commits the Island to a particular solution to its solid waste disposal and closes out many local recycling, reuse, and reduction of waste initiatives, one expects a more comprehensive analysis of alternatives, which current documents do not include.

It is unclear whether municipalities will or not be forced to produce a set amount of solid waste to the Project (the EIS says no, but press reports contradict these statements). If municipalities are forced to accept the Arecibo Project as the site where all their solid waste is to be disposed of, then the incentive for smaller-scale solutions to waste disposal are lost as the Project will require a steady supply of material to remain operational. True that Puerto Rico is behind in recycling, but this is not because its people are somehow insensitive to this issue. Lack of recycling programs and opportunities explain the current state of affairs and those who look out for the public good must carefully weigh the consequences of concentrating so much responsibility on a single Project. If the Project fails, the whole Island fails.

The current justifications for the Project do not analyze the increased costs of transporting solid waste to Arecibo. Current documents pass this responsibility and costs to other agencies of government while claiming only the benefits of the Project. What is the cost and effects of transporting over long distances so much

solid waste from many municipalities to a single location? Burning of fossil fuel, air pollution, noise, road deterioration, increased truck traffic, etc. all require careful consideration because these actions are precipitated by the Project. Moreover, what produces more jobs and economic activity, the Project or an effective Islandwide recycling program? Nowhere are serious alternatives to incineration discussed in available documents.

The use of water from the Caño Tiburones assumes that the water pumped by the Commonwealth at El Vigía is somehow excess water no longer needed for coastal systems or the Caño itself. The selection of this alternative over the recycling of sanitary waters was done without an analysis of the ecological effects of reducing freshwater input into coastal wetlands and coastal waters while increasing marine influence on the coastal zone. Assurances are needed to the effect that the water withdrawal can be sustained without irreversible change in salinity or functioning of coastal wetlands.

Disclosure and analysis of the full array of environmental effects of the proposal. To date, no one knows where the ash from the incinerator will be deposited. It is impossible to properly evaluate the Project if a major long-term effect of its implementation and approval occurs outside the selected location and those effects cannot be examined because the locations are not disclosed. The issue is compounded by the possibility of releasing toxic substances to the environment and the already difficult situation in the Island with the disposal of ash residues from another energy-generating plant.

The proposed atmospheric output of the incinerator will comply with the concentration levels in federal regulations, but that compliance does not automatically mean that the toxic materials in air and ash (including fly ash) will not affect social and ecological systems. The Project is located near human communities, agricultural activities, and ecological systems that could be affected by EPA-compliant air. These social and ecological systems do not only respond to concentration of toxins in materials or air, but also to the absolute amounts of these toxic materials. An historical analogy is instructive.

In the 1960's atmospheric nuclear explosions were globally banned because of the phenomena of ecological concentration and magnification of nuclides. Ecological systems such as Florida pastures were exposed to low concentrations of radioactivity and through their natural functioning concentrated and returned the nuclides to people in the form of radioactive milk, including radioactive breast-feeding milk in humans. I have not seen a calculation of the absolute amount of toxins to be released in the atmosphere and their fate on the landscape other than expected dilution either in the atmosphere or elsewhere. All relevant data are reported in units of concentration that appear very small and within regulations. But what is the long-term absolute amount of these toxic substances discharged into the social and ecological environment of Puerto Rico?

The karst forests and karst pastures in the vicinity of the incinerator concentrate nutrients and organic matter over the nutrient-poor rocks, much like Florida forests and pastures do when growing on sandy soils. Will these tropical systems concentrate toxins and return them to humans in their milk and food? This is a question that should be of enormous interest to USDA because the karst region where the Project is located supports the milk industry of the Island, one of the few agricultural activities that are almost self-sustaining in Puerto Rico. To be convincing that this Project has no effects on people or ecosystems it will be necessary to construct a mass balance of materials, including the toxic ones that escape the site through the air or ashes. Using the law of mass conservation, such a mass balance needs to be expressed in units of weight per unit area and unit time. Ecological research should establish the concentration power of toxic substances by karst forests and pastures. This will allow a quantitative assessment of the load of chemicals that this Project will have over the surrounding ecosystems and human communities, over the long run.

Long-Term Aspects of the Project. The fundamental issues that require special attention when addressing the environmental impact of this Project are its effects over the long-term. For example: long-term effects on:

- The level of recycling in the island,
- The transportation costs and effects of hauling garbage long distances to Arecibo,
- The potential accumulation of toxins by forests and pastures and their potential transfer to people,
- The environment due to accumulating ashes in undisclosed locations,
- The changing hydrologic conditions around Caño Tiburones, and
- The rapidly evolving demographic and economic situation of the Island (and vice versa).

To effectively address the five issues that I have outlined in this letter, your agency must not depend on previous documentation used to justify this proposal through the local jurisdictions. Any cursory review of past documentation quickly establishes that the record is incomplete, obsolete, and misleading. For example past documents, do not disclose the location for the disposal of ash, it contains obsolete population data, and it misleads on how waste management of municipalities will be affected by the proposal. The ecological consequences of potential natural concentrations of toxins are ignored. Moreover, as I discuss above, the effects of the Project has to be considered over the long-term because this is a decision that affects many components of the economic, social, and ecological systems of the Puerto Rico for decades to come.

The USDA has an opportunity to help this Island make a decision of fundamental importance to its future in a way that is open and fair and which discloses all the potential benefits and hazards of what is being proposed.

Sincerely,

Ariel E. Lugo Támesis 1528 San Juan, PR 00926



Mach P.R. 21 ochobre 2015

R. U.S.

Serines !

Estave presente en Vistos Publicos en Anche y esto fae un atropello a la Comunidad de Aracilo al no dornos o portundad de manifester que no Aprocabo la planta de Energa Answers en Arecibo y que es contra una ciudad pobre y desvolida que Uds. van la hacer daño a l'aproba un dinero fara causarnos entenadades. Eso será un exterminio de la población y tectures niños.

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Detertanente,

Migdali Mating the-01-1301 11042 Arecibo, P.R. 006R

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Atentamente,

LAUREN MCGEE RAYBURN
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Atentamente,

LAUREN MCGEE RAYBURN **Environmental Scientist Rural Utilities Service (RUS) Rural Development U.S. Department of Agriculture** Mailing Address: 84 Coxe Ave. | Suite 1E | Asheville, NCA 28801 Office: (202) 695-2540 | Mobile: (202) 779-1344 | Fax: (202) 690-0649

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me opongo a que su agencia le autorice infanciamiento a un incineration porque.	
Afecta la Salud!!!	

Atentamente,

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Tudith Morales
Vasallo H2
San Juan, PR 80911

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Atentamente,

Angélieu Molina Arecibo, P.R. 20612

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Estimada senora McGee:

Me opongo a que su agencia le autorice financiamiento a un incinerador porque:	
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Atentamente,

César Lugue P.O. Box 255 Aguas Bunas, PR 00703 LAUREN MCGEE RAYBURN
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LAUREN MCGEE RAYBURN

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Atentamente,

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Estimada senora McGee:

Me opongo a que su agencia le autorice financiamiento a un incinerador p	orque:
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Atentamente,

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Estimada senora McGee:

Me opongo a que su agencia le autorice financiamiento a un incinerador porque:

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· Agestará crerpos de agua importantes
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Atentamente,

Morrila Bodriguer Markari Torre Magagner, Calle Por Gimener Magagner, Pourto Mio LAUREN MCGEE RAYBURN **Environmental Scientist Rural Utilities Service (RUS)** Rural Development U.S. Department of Agriculture Mailing Address: 84 Coxe Ave. | Suite 1E | Asheville, NCA 28801 Office: (202) 695-2540 | Mobile: (202) 779-1344 | Fax: (202) 690-0649 Email: lauren.mcgee@wdc.usda.gov PORTAL: www.rd.usda.gov Estimada senora McGee: Me opongo a que su agencia le autorice financiamiento a un incinerador porque: Exercitamino air que generora esté inamentanon será Sumamente Nocino a la salud de las personnes del Atentamente,

Wailing Address:

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Estimada senora McGee:

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Estimada senora McGee:

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Atentamente,

Lic Miguel Raldins
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939-8717-5900 Wisuelat pre Jahre com LAUREN MCGEE RAYBURN
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Estimada senora McGee:

Me opongo a que su agencia le autorice financiamiento a un incinerador porque:

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Atentamente,

Santon Pallé
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Todo.	

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Estimada senora McGee:

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Atentamente,

Leberil Melendez gabyquique 12@hotingil.com

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Estimada senora McGee:

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Estimada senora McGee:
Me opongo a que su agencia le autorice financiamiento a un incine

Me opongo a que su agencia le autorice financiamiento a un incinerador porque:

Me Mi oposición Al Incinerador os simple:

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Atentamente.

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84 Coxe Ave. | Suite 1E | Asheville, NCA 28801

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Email: lauren.mcgee@wdc.usda.gov

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Estimada senora McGee:

Me opongo a que su agencia le autorice financiamiento a un incinerador porque:
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Atentamente,

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Estimada senora McGee:

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Atentamente,

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Estimada senora McGee:

Me opongo a que su agencia le autorice financiamiento a un incinerador porque:

es sumamente danino para la salud de todos las
personas que tienen cercanía a este. Además
afècta nuestras tierras que producen nuestros
propios alimentos. Suy mades empararada y es
impresionante que ya mi beté tensa que verse
afictado. Son muchos los danos. Todo lo que
pueda hacerse para prohibir casas como esta,
de be ser realizado. Gracias por la atrición a
este asunto

Atentamente,

Janssa Cura Berrios
Manati PR Overt
jneuralagnait.com

LAUREN MCGEE RAYBURN **Environmental Scientist** Rural Utilities Service (RUS) Rural Development U.S. Department of Agriculture Mailing Address: 84 Coxe Ave. | Suite 1E | Asheville, NCA 28801 Office: (202) 695-2540 | Mobile: (202) 779-1344 | Fax: (202) 690-0649 Email: lauren.mcgee@wdc.usda.gov PORTAL:www.rd.usda.gov Estimada senora McGee:

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Rural Utilities Service (RUS) Rural Development U.S. Department of Agriculture Mailing Address: 84 Coxe Ave. | Suite 1E | Asheville, NCA 28801 Office: (202) 695-2540 | Mobile: (202) 779-1344 | Fax: (202) 690-0649 Email: lauren.mcgee@wdc.usda.gov PORTAL: www.rd.usda.gov Estimada senora McGee: Me opongo a que su agencia le autorice financiamiento a un incinerador porque: calidad OMW respiration ninos escuelas ninos contaminadi SID respiration D GIM deturnamenes) racer. a) a inecestrin verungos SUS TIBUIDNES Atentamente,

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LAUREN MCGEE RAYBURN Environmental Scientist

Rural Utilities Service (RUS) Rural Development U.S. Department of Agriculture Mailing Address: 84 Coxe Ave. | Suite 1E | Asheville, NCA 28801 Office: (202) 695-2540 | Mobile: (202) 779-1344 | Fax: (202) 690-0649 Email: lauren.mcgee@wdc.usda.gov PORTAL: www.rd.usda.gov Estimada senora McGee: Me opongo a que su agencia le autorice financiamiento a un incinerador porque: es danivo alaxaled y Al Ambiente deles Atentamente.

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Estimada senora McGee:

me opongo a que su agencia le autorice financiamiento a un incinerador porque.
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Atentamente,

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Estimada senora McGee:

Me opongo a que su agencia le autorice financiamiento a un incinerador porque:
There morna to fill everything
Amo Aleir bo y esto afectara
todo el medio-ambrente, nuestros
ninos, jovenes, ansianos.
Queramos Agricultura, Overemos
vida. No quiero mourir de cancer,
o que mis hiros/nieros salgancon
malfornidades.

Atentamente,

Estetania Pieras Hilera Estudiante UPR RT

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Me opongo a que su agencia le autorice financiamiento a un incinerador porque:
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Atentamente.

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Estimada senora McGee:

Estimada senera moese.	
Me opongo a que su agencia le autorice financia	miento a un incinerador porque:
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Maria C. Talz Bo Mulis Agus Bruno, P. A.

Rural Development U.S. Department of Agriculture Mailing Address: 84 Coxe Ave. | Suite 1E | Asheville, NCA 28801 Office: (202) 695-2540 | Mobile: (202) 779-1344 | Fax: (202) 690-0649 Email: lauren.mcgee@wdc.usda.gov PORTAL: www.rd.usda.gov Estimada senora McGee: Me opongo a que su agencia le autorice financiamiento a un incinerador porque: Atentamente,

LAUREN MCGEE RAYBURN
Environmental Scientist

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Estimada senora McGee:

Me opongo a que su agencia le autorice financiamiento a un incinerador porque:
Rfecta muestro
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Atentamente,

Di. Casanova Altonzo Latillo

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Estimada senora McGee:

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Atentamente,

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Estimada senora McGee:

Me opong	a que su a	gencia le autor	cia le autorice financiamiento a un incinerador por				
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Atentamente,

GC-01 Box 12126 Vraca, S. 2 0079

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PORTAL: www.rd.usda.gov

Estimada senora McGee:

Me opongo a que su agencia le autorice financiamiento a un incinerador porque:
POR RAZONES ECONOMICAS Y
Ambrer Tales, Lu Salud del pueblo
es primero que Todo

Atentamente,

LAUREN MCGEE RAYBURN
Environmental Scientist
Rural Utilities Service (RUS)
Rural Development
U.S. Department of Agriculture
Mailing Address:
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Estimada senora McGee:

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Estimada senora MCGe	ada senora McGe	imada senora McGe	e e
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Estimada senora McGee:

Me opongo a que su agencia le autorice financiamiento a un incinerador porque:

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Atentamente,

Redu R. Muzel Ophl. Altomote Box43 Spr Japp - Re Dgvl

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Atentamente,

Meguel E. Frolm. D Dos Courte CT Edera, MN 55435 LAUREN MCGEE RAYBURN **Environmental Scientist** Rural Utilities Service (RUS) Rural Development U.S. Department of Agriculture Mailing Address: 84 Coxe Ave. | Suite 1E | Asheville, NCA 28801 Office: (202) 695-2540 | Mobile: (202) 779-1344 | Fax: (202) 690-0649 Email: lauren.mcgee@wdc.usda.gov PORTAL: www.rd.usda.gov Estimada senora McGee: Me opongo a que su agencia le autorice financiamiento a un incinerador porque: construyan el incinerador. Atentamente. Griselle Rivera Rios Bo. Guatemala San Sebestian, PROJES

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Estimada senora McGee:						
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Me op	ongo a que su	agencia le	autorice fi	inanciami	ento a un incir	nerador porqu	le:
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Estimada senora McGee:

Me opongo a que su agencia le autorice financiamiento a un incinerador porque:
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Estimada senora McGee:

Me opongo a que su agencia le autorice financiamiento a un incinerador porque:
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Ме ор	ongo a que su agencia le autorice financiamiento a un incinerador porque:
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Estimada senora McGee:

Me opongo a que su agencia le autorice financiamiento a un incinerador porque:
this project will affect the people
on the island in a NEGATILE
way It Affects the environment
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fer of the world by releasing
Greenlacuse agrices and increase
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bespiratory afflictions

Atentamente,

DAGMA	RESALGADO	Oquendo
Useguerd	Translator	
	,	

Sr. Secretario. Le agriculture USA

Me aponjo al incinerador de Arcibo, P.R., parque este es summente toxico generando enormes contidades de escorias y ceniras volantes. Por lo tanto, la incinemción de residuos virhanos no prede considerarse como um fuente renovable y limpia de energia. La incinembra prede trave problemos pulmonares, infaminantes en el aine como el monoxido de curbono, óxidos de nitro geno, bioxido de arufre y vapores liquidos.

Es incrible que apopen la invinendon luando en los USA
existe ha EPA, que es la agencia encurgada por la Salud publica
y ambiental. Esto quede trave muchos mois problemas, de los
que ya existen. Las particulas del aire entran al sistema
problema de enfermedades; como asma. Efecto en la Calidad en el
uire, Suelo, agua y comida:

Soy estadiante de 3° año en Ciencias Ambientoles y
es incuible que la EPA afogogoye este poyecto, asumo
que tienen el conocimiento del daño que este podría
causar Teny, si de que tienen el posonel con la apacidad
de trabajar para el medio ambiente, es por esto que les pide
a persar en la naturaleza y en la Salud publica. Piensen en
en el Medio Ambiente no en la economica. El enterno
es el medio Ambiente.

Estadiante de Ciencias Ambientetes

Estimada senova McGree:

Me opongo a que su agencia le autori ce financiamiento a un incinendo parque: O los emisiones que generaria serían vorione pum la commissade aldurar, as los o para el medio ambiente. O Permitir que un incinerador entre en operacione la contra el kiementar que significamia la adacción de la generación de dapendirios solidos (lo cual en polífica pública del gobierno en unateria de acidaçe), puer el incinerador aguir se de la generación de mas y man desperdicios pune su funcionamiento; lo cual en contrario al problema que, de modo enjanoso, pur fende haves creer que sa a resolver. O No se pronuere, con la instalación de un incinerador, el deranollo de frende de energía limpia, puer ho en el incinerador una de ellar.

Atentamente,

Gabriel Muriente Partrana Bio Piedras

9-23-2015 Dr. Secret. de agricultura; Construcción del Incenerador Nefasto planeado para dreción.
planeado para dreción.
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I. Seosethis de Agricultura 1/2013 He opened at interestor Dor a tobker in Much fruh Eno Is he as summent fixing . While project a state por he solved by his in the potents Cindled , so 1.6. Box 603 Kyy, Punh Ris

SR. Secretario de Agricultura U.S.A.

Me openço al Discinerador en Avecibo (Energy)

Consumo porpo es sumamento tóxico

Confaminaria el Embrento de el Publo de Arecho

y preblos Adgacentes: Harrillo, Camoy, Prebradellos

No le den financiamiento a Energy Chisuca

y a qui este Incinerales en nefasto para la selod

Emplimental

Portaciamento

Circabo, P.R. 00662

Jaceren Megee Kong benn Me opongo al incinera dor de ciseros porque on parente renal contaminada con plomo. El agua de Greibo libaro esta contaminada con plomo, Tecturas 2011 5.5 ; 2012 7.2; 2013 8.8 y 2014 6.0 Cuando no delle exceder de 10015 ppn/1140. La EPA no hace nada. Degnara el problema del agrea contantinada con la que nos bavamos, cocinamos y limpiamos. Lu dinuo no debe per invertido en una tecnologia soite produce muerte, enfermedad, dales, dans al planeta y distrucción. No vamo a permitis su construcción. Moriremos en ese lugar antes que permetir que nuestra prventad no tença opartarii dad Olguna de pourevira. No inviertan pu dinera en eso. Van a perder.

Spia Rodrifz Cueurs Calle B # 46 A Carecito, P. R 00612

Oll Dr. Decretavo de agricultura USA
Me eposso al incineradas de Anecho
parque este es sernament toura, no le den
Financiemiento a Energy Censurer. Estr incineradar
as nefasto, para la salud ambiental y de nuestros
Ciudadonos.

Bethrale Conce Monskude

23 Sept. 28/5 My Farmen M. Kayburn RUS/ND USEA Regime office Asherillo NC 06 28801 The Federal government mest not about the dangerous despite claim to the contrary to relich very clanguous tixins to the environment. I have been informed that there are plans to subsiding a unstate to energy plant in Arculo (PK). This is a clargerous presedent and the life and health of many hurt hiero will be severely endangfred. I manifed my opposition to any subidies, grand or reduced interest loans to this project known as "Energy Annuers" HIS Whan ansuger rather Huill set off many greations when the health of people of the more coast of Sunt his tegt Joseph Rox 10) Tom Aldn PK GODS Y

Sr. Secretario de Agricultura U.S.A.

Me Ofongo, al in Ai percel or

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Cin Jaclanos ...

Noel J. Aieneto

8. o. box 1594

Mora P. P.

00676

It Secretario de Agricultara:

El proyecto del incineralmo es

uno muy derimo para muestra salval.

Energy Answer esti godiendo ayuda seorimina para establecense. me opengo
a esto, ya que afritara sa salval de
Indo un guebbo.

¡¡Abajo el Incinevador!!.

Juanita Hartinez Logues
Urb: San Felipe
G-4 Cilles
Aneciso, P.R.

». , <u>,</u>

23 de sept de 2015 Al secretaria de agricultura de los E. U. no galevo que les prester , q diviero para construir la planta de ja que

va a crear dois al ambiente de innestra bla.

Patillas P. R. 00714.

To the control of the

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Le ruepo detener esta refeste ceción.

Mores J. Haranda Mores J. Haranda 787 597 9097 Companying marvier 238

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Carle 11 # F.7 Les flanos

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LAUREN MCGEE RAYBURN
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Estimada senora McGee:

Me opongo a que su agencia le autorice financiamiento a un incinerador porque:

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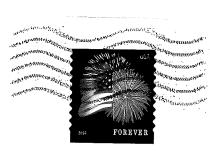
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Istimada Sta. Mageer

la Johanns Rivera me apago al financiamiento del incinerador en Puerto Rico hagalo en el patio de su casa por favor Gracias.

ido P.R. 00612

OS HOW BUT PHO 2 T



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Para: Lauren Mcgee Rayburn RUS

Estimada Sra. Magee

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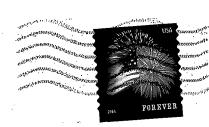
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ma Castro cibo P.R.

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Lauren Mc Gee Environmental Scientest 45 Det 9 Cagniculture Esteriada Sro. MC Goe No necesilamos un incinerador en nuestro Grie lempis. Tiène que Ver Olra Manera de pagar Dipracia Muchas graces Comen L. Herrande Manaka 1606 hot mail Eon SAN KIAN PROPE OS WIN DILS PW RT

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i No a el incinerador. i Baste ya del aboso!

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00612

Dra Carmen J. Mendez Pediatra Aucibo D.R. 00612

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Orlando Monzalez Claudio. P.O Box 683 Vega Baja P.R.

SAR KIRA PARTA

as mon bore on it



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Estimada senora McGee:

Me opongo a que su agencia le autorice financiamiento a un incinerador porque:

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Atentamente,

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Tomas Carlos Puiz P.O. 681 Pio Grande P.R.

SAW XAW FE OW OS MOV XRES PW 2 T



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- Որդերապերաիկաիիիակափոկիվոկութ

Alejandro Torres Rivera Fajardo - Puerto Rico

OS HOW BUILD FIRE D. T.



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LAUREN MCGEE RAYBURN

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Estimada senora McGee:

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Pivra E. Rivera Sotomagor Lares, Puerto Rico



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Estimada senora McGee:

Me opongo a que su agencia le autorice financiamiento a un incinerador porque:

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Damaris Chico Pames (fel. 398-0421) 187-Arecibo, P.R. 00612

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սուկիննենի որ արդերինի հուրաների և

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del pueblo. Atentamente. 2 Luis A. Basona

LAUREN MCGEE RAYBURN

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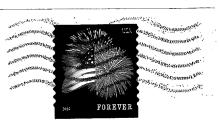
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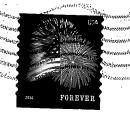
LAUREN MCGEE RAYBURN **Environmental Scientist Rural Utilities Service (RUS)** Rural Development U.S. Department of Agriculture **Mailing Address:** 84 Coxe Ave. | Suite 1E | Asheville, NCA 28801 Office: (202) 695-2540 | Mobile: (202) 779-1344 | Fax: (202) 690-0649 Email: lauren.mcgee@wdc.usda.gov PORTAL: www.rd.usda.gov Estimada senora McGee: Me opongo a que su agencia le autorice financiamiento a un incinerador porque: Porque vois y me cricen Allecibo y mijente estaba Saludable antes de LAS FACTORIAS y ahora quieren castigar amijente con mas pir Polutants. Noes justo. Atentamente, Baracute Pur

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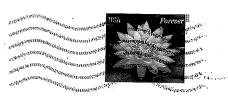
Estimada senora McGee:

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Estimada senora McGee:

Me opongo a que su agencia le autorice financiamiento a un incinerador porque:

Atentamente,

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Estillada selivia incoee.
Me opongo a que su agencia le autorice financiamiento a un incinerador porque:
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Me opongo a que su agencia le autorice financiamiento a un incinerador porque:
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Estimada senora McGee:

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Estimada senora McGee:

Me opongo a que su agencia le autorice financiamiento a un incinerador porque:

la calidad del aire que respiramos se va aver afectada

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Atentamente,

In 23 Septiembre 2015

Elisq Sanchez Torres Arecibo P.R. 00612

SAN MARI PRICOR.



Martin Cobian Arecbo P.R.

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 23 de Septiembre 205 Lauren McGee Raybourn RUS

.. Estimade Sva. McGee?

Por este medio desco expresarie mi total rechazo a la instalación de una Planta de Incineración en el pueblo de Arecibo, Puerto Rico. Puerto Rico no necesita una plante de incineración, que contamine nuestros cuire y suelo, ademas el uso de agua excesiva en este proceso desmerce la calidad de vida para los premoviqueños. Necesimon aque paire la agricultura y consumo humand. Plantas de Reciclogie de composta, vidrio, y almunio penificiaria a nuéstra economia, à là protección del medio ambient y las comunidades costerus de là zona norte. NO Al Incinerador, NO a los 800 millones parq Contaminar

NO; boista el abuso à las comunidades.

Elisa Scinichez Torro AMAR. Seño Mc bee RUS

La presente es para informarle muestro total q absoluto rechazo a la construcción del incinerador de Arecito. El mismo no solo representa una amenaiza para la Salud de los residentes aledonos al incinerador, sino tambien al impacto ecologio y ambientel que el mismo sapone tanto para la flora como pera La faura de la 2010 non oeste da Parto Rico. Este impacto no ses es comparable en terminos lo Deneficios que podizion sucederse como resultado de la construcción del Inténerador. Es machisimo mas alto el impacto negativo gee el positivo para la vida hunning y ambiental. Atentamente Martin Cobian

Arecibo P.R. 00612

SAN RAM FR 100 05 MOV 2015 PM 2 L



Lauren Mcgee Rayburn
Environmental?
US Department of Agriculture
84 Coxe Ave, Suite 1-E
Asherville, NC 28801

remoiraise

իգյունիկարդիրով գովակիիկութերիիինի

Zulma De Jesus Bo. Coabey Jayuya P.R.

SAN JUAM PR (009 05 MOV 2015 PM 2 L



 Lavren Megee-raybun.

No hace nada fora beneficiar
a fricto Lico,
mustra gente rucesta
tener salid. y que vivorus en
condiciones, dignes,
lso que queuen hour el
asecinar y destruir muestro
lecurs m y la do had
del quello faero riquemo

Mads faiz Cisco Las hurts Fico

Para: Secretario de agricultura fring : July (Zulma De Jesús) Me opporte af encener der porque efector of amberde y la saluel.

Arecado, P.R. . 20 agos to do 2015 R. U. S.
- Pept Agnico Horse Estoy objects a que Rus le conceda un prestore a Energy Answers para construire Incineradore en Arevibo, P.R. Serves ! L Ed dans a causarnos no lo page ringun dinero. Uds serán los culpables de nuestras miseras Vidas. Eldano que consará a nuestra población no puede con pensonse con ringin divero. Chuere mos UIDA y Scolod. Si Uds aprueban el prestamo le están denndo dinero para el Vénero que in yesterán en nuentros ouerpos No aprie ben el prestamo! Demos Vida (contribuyan pana Salud y alimentos que es lo que necesitamos)

> Cordialmente, Olga Jus Cuy Rojas HC-101-BOX HD46 Arcubo, PA 60612

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Lauren Mcgee Rayburn Environmental Scientist Rus US Department of Agriculture 84 Coxe Ave, Suite 1-E Asherville, NC 28801

Areabo P.R 27 oct. de 2015

Estoy o puesto a la Incineradora de Energy Answers
en Areabo, P.D. por las siguientes razones:

DLa Salud se relectora

D P.R. es una ciudad pobre, con un indice de
morte li dod por cánceres de diferentes clases

D Muchos minos y adultes padecen de asma
Estas enfermedades se agradarán por la confaminación de la incineración

Ulos van a ser ca/sables al igual que la Energy answers, y serañ responsables directos de hue stras entermedades, sia puebon e prestama para la construcción de esta Maguina de la Muerta. En Alemania Hitler, Ulds. R.US apeyan algo similar

> Francisco Puera Romais HC-01-Box 11043 Anecibo LPR