Dear Lauren,

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

Thank you.

Paul Connett, PhD

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: <u>ahmina@no-burn.org</u> Cell: 510-463-1308



US & Canada Campaigns & Membership Coordinator GAIA: Global Alliance for Incinerator Alternatives www.no-burn.org

From:	Hannah Chang			
To:	<u>McGee Rayburn, Lauren - RD, Barnardsville, NC</u>			
Subject:	Comments on Arecibo Incinerator Project DEIS			
Date:	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 New York, NY 10005 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:	Hannah Chang; Ken Rumelt; Jonathan J. Smith; Teresa Sanchez Rodriguez; Amory A Ledyard; Ian R Peterson; 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.

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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 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 km². 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 CO₂/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

Table 1. Emission rates of hazardous pollutants emited by the Arecibo incinerator in metric tons (Mg) and the factor by which they 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 km ² (see text for discussion). There are significant discrepancies between the emission numbers in the EIS and the EIS.	ants emited by the Arecibo incinera te". Data are from pages 3-47 and 3 an affected area of 157 km ² (see tex and those in its Appendix C, page 15.	cibo incinerator in met es 3-47 and 3-48 of the ⁷ km ² (see text for disc ¹ ix C, page 15.	rric tons (Mg) . EIS. Emission: Ission). There	and the factor b s are projected i s are significant	y which they to 30 years of discrepancies
Hazardous Pollutant	Emission Rate (Mg/yr)	Annual Emission / Significant	Mg of Emiss per km ² (Mg of Emission and Load per km ² Over 30 yr	Annual Load (kø/km²)
*		EIIIISSION	Emission	Load	1 10
	702	3.57	21,060	134.140	4471.3
Nitrogen oxides	353	8.8	10,590	67.452	2248.4
Sultur dioxide	260	6.5	7,800	49.682	1656 1
Particulate matter (filterable)	51.7	2.07	1,551	9.879	379.3
Particulate matter < 10 microns	7			I	2
(filterable and condensable)	T04	6.93	3,120	19.873	662.4
Particulate matter < 2.5 microns					
(filterable and condensable)	06	6	2,700	17.197	573.2
Volitile organic as precursor of ozone	52.4	1.31	1,572	10.013	333 8
Lead	0.31	0.52	۲ ۲	0.050	
Berylium	0.0032	~	0.0 1 C	6000 U	0.2
Nickel	0.024	NR	T-0		0.02U
Cadmium	0.041	NR	1.2	0.00783	0 761
Chromium	0.016	NR	0.5	0.00306	0.102
- Zink	0.93	NR	27.9	0.178	101.0 0
Amonnia *ri · ·	28.8	NR	864	5.503	183.4
Fluorides	10.8	3.6	324	2.064	68.8
wercuty *6ts:	0.0692	0.69	2.1	0.013	0.441
3011011C acid *H:.d=0 = 0 = 1 =: 1 =	16.6	2.37	498	3.172	105.7
nyurogen chloriae	124	NR	3,720	23.694	789.8

11.63 1.22E-03 0.0000078 0.0003	2.85 1,284 8.178 272.6	10.38 12,450 79.299 2643.3	∞ 0.06 0.00038 0.013	
4.07E-05	42.8	415	0.002	
Municipal waste combustor organics measured as 2,3,7,8- Tetrachlorobenzodioxin	Municipal waste combustor metals measured as particulate matter *Municipal waste combuctor acid meeo	measured as sulfur dioxide and hydrogen chloride	Arsenic	NK = Not Regulated *Acids or lead to acids when mixed with water

*Acids or lead to acids when mixed with water or oxygen in the case of carbon monoxide. Acid produced by 924,750 Mg CO₂/yr is not included.

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February 9, 2015

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

COPY

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

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Alacto P.R. 21 octobre 2015

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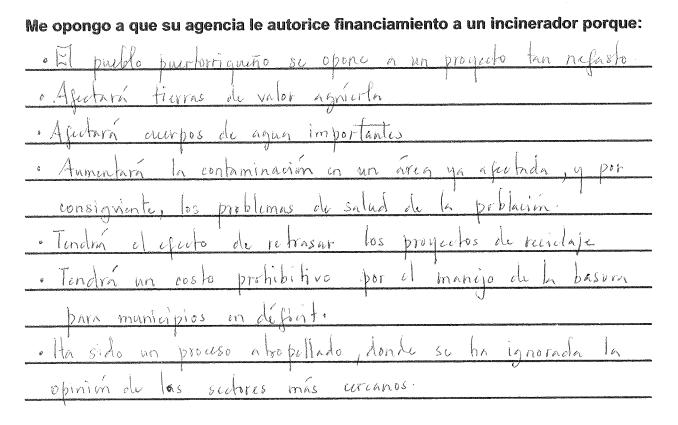
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Colle 25 N-E H 272 - Puerto Muro San Juan, Puerto Rico 00920

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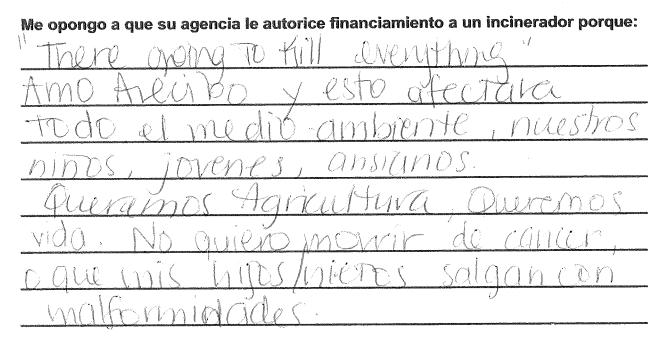
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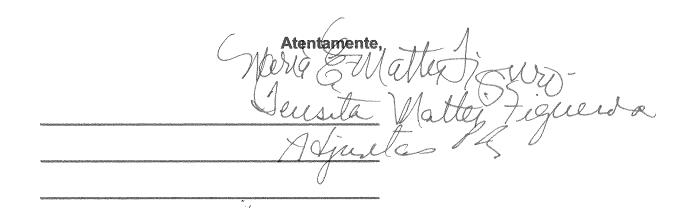
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23-509-2015

Sr. Se cutario, Le agriculture USA

Me opony al incinerador de Arecibo P.R., porque este es summerente toxico generando enormes cantidades de escorias y cenizas volantes. Vor lo tanto, la incinención de residuos urbanos no puede considerarse como una fuente renovable y limpia de energía. La incinentore prese tour problems publicares, intanimantes en el aire como el monoxido Le urbeno, oridos Le nitrogeno, bioxido de azufre y vapores liquides.

Is incrible and apopen la incinendora luando en los USA existe ha EPA, que es la aguncia encargada por ra salud publica y ambiental. Esto quede trace muchos mois problemas, le 105 que ya existen. Las porticulas del aire entran al sistema problemado enformedades; como asma. Efecto en la calidad en el vire, Swelo, ague y comider.

Soy estudiante le 3° año en Ciencias Ambientebes y es increible que la EPA apogoye este poyecto, asumo que tienen el conocimiento del daño que esto podría Causar Tingo Fi de que titnen el porsonal ien la apai ded Le trabajoir para el medio ambiente, es por esto que les pide a pensar en la naturaliza y en la salud publica. Viensen en en el Medio Ambiente no en la economica. El interno is il medio Ambiente.

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Atentamente,

Gabriel Muriente Pastrana Rio Piedras

9-23-2015 Sr. Secrit. de agricultura, Construcción del Incenerador Nefasto planeordo para arecidor planeordo para arecidor polaido a lo megativo que es para la salual el francionamiento y Ne uno a toda la población Conociente que rechago dicha Construction Efian Jainer Mairero Nomos Rusero 37 Pentagressia Guaynabo PR. 00969 ***** • 7

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SR. Secretario de Agricultura U.S.A. Me opingo al Diversador en Avecibo (Energy) Answer porpo es sumamento toíxico Confamineria el Embiente de el Pueblo de Arecho "I pueblos Adyncentes: Harrille, Camey, Quebradillas No le des financemento à Energy ansuer ya qui este Inavendor er nefnstogana la selud Embrental Inf Apolina (INTRO B) 626 Bo Santara UReabo, P.R. 00612

Jaceren Migee Kaybera

Me oponjo al incinera don de libertos porsur ory paciente renal contaminada con plomo. El aqua de Greibo libario está contaminada Un plomo, Lecturas 2011 5.5 ; 2012 7.2; 2013 8.8 y 2014 6.0 Cuando no dete exceder de 10015 ppn/lito. La EPA no hace nadà. 'Nghara il problema del aqua contancinada con la que nos bañamos, cocinamos y limpiamos. Au dinero no debe per invertido en una tecnologia eque produce nuerte, enfermedad, dalas, dans al planeta y distucción. No vamos a primitis su construcción. Mariremos en ese lugar antes que permités que nuestra prventad no tenja opartanii dad geguna de pouraisis . No inviertan pu dinere en esc. Van a perder.

Alvia Rodujz Cueins Calle B # 46 A Queito, P. R 00612

Al Dr. Secretorio de agricultima USA Me opongo al incinenadas de Anecho parque esté es sermament toure, no le den Financiemiento a Energy answer. Este incineradas - 20 nefasto, pona la salud ombiental y de nuestos Ciudadamos.

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23 Sept. 2015 My Fauren M. Kaybun RUS/ND USEA Regime office Asherillo NC 0 28801 The Federal government mest not about the dangerous practive of burning wast. This has been noven, depite cleans to the contrary, to reliable very clangerous tixins to the environment. I have been informed that there are plans to subsidig a waste to energy plant in Arculo (PK). This is a clangerous predent and the life and health of many Hund Hiano will be severely endangrid. I manifed my opposition to any subidies, grand on reduced in the for this project known Huill set off many quartiers when the Meable of people of the north crast of Shurts this Legits Joege Cetz Colom Joege Cetz Colom Jo BOX 10) Ton Aldn PK. GD954

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A. Secretario de Aquientora: El proyecto del incineralm es uno muy danino para muestra salud. Every Answer esti gidiento agude scovinice par estublecense. me open go a asto, ye gre afitting & saled de Loslo un gueblo. ji Abajo el Incinevador !! Juanita Martinez Ligas Urb . Son Felipp Gy Calle 5 Anecido, t.R.

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a ginen Pueda Interessar Me, opongo al incinerador portque sey amático d'ese proyecto portara gucio mentro aire, contaminara el. ganado y las trerres. Ensuciara mestes aquesti tentemará mestos ganado. na ritærg all : sælærerising la dl Stasparg ere si samerbroge all : arenib Perho Mont Coloin Carle 11, 77 F.-7 Los flans Pro. Sanstance Diverso P.R. 00612

Estimada senora McGee:

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

De 761 NA IO C d 6

Atentamente, anon COM γ X

52. Serve fariz lincomente a la construcción de este incinensador, yo como químico ce que estas emiciones metros veces son efectivas pero muchas veses fallar y vacando te ilsa es que se contamina el pres alguico te y de as goe se contamina the Agander is su compreheising

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

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Istimado Sta. Megeer la Johanna Rivera me apango al financiamiento del incinerador en Puerto Rico hagalo en el patio de su casa por favor Gracias. ians Rivera Libo P.R. 00617 SAM ILSAM PRODE OS NOW 2015 PM X T

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

2860134168

արդեսաների արդեսի ար

Para: Lauren Megee Rayburn RUS Estimada Sra. Magee Me ppongo a que su agencia: financia la incine ora E San Svan P. R. & 23 & royel 78/5 fiven Lozally tel 727640 At67 Hiram Lozada

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Diedras, Prent Rico

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

<u>սելու է ներան անդան է ներան անդան է ներան է նե</u>

St Lecretario de Agriculteri Me opnos al reinerador de Aregino porque este es toxico in actor dal. No le den financiamiento a Energy Answers. Es he fasto para là Salul, Ambreilap. Att Iline Je. ma Castro SAN MARY PRICES cibo P.R: 05.11012/2015-PM-2 T 00612

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

Dr. Scoritairde Agricultura USA: Me opongo firmemente al establecimiento del incinerador de Arecibo razones de ser un atentado la solud, al aquadel Caño burongs y al fumbiente es Es por todo eso, que le digo al incinencedor le Arocibo Sinceramente icarlo Saretl elea ipo A lacionat do Pared Velez SAN MAN PR COD ijagiia 05 MOV 2015 PM 2 L

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

2880134168

ilepartomento de agriceltura 43A. Me opørgo al incineradar de Greado porque ese es un projecto, Mejosto para la falad de troso tros Clos puestoriquesta). No le den Jenok crosseln + al Energy aprivers. Porque termin con toldes resters Mercedes Jopez Kivera He mercedesphertorico @ g mail. com. Culo A-torses <u>2919810992</u> rlos A. Jorres

T T MA STOZIAON SO BOD MAINTO NAS

latillo, Puerto Rico

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

Lauren McGe Onveronnien top Scientest 45 Det of agriculture Esternada Sro. MC Dee No necesitamos un ineinenador en nuestro frie lempis. Tiene que Ver Olra Manera de Dogar Difuació Muchas graceas Comon L. Henonde Manabear 160 @ hot mail Em SAN XIAN PE (XP3 1 T. Vervands OS MON 2315 PM 2 T rado, Puerto Rico

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

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Seño Securicio medunião austral per realis 1012 este: cente para alerra que no de favolos para graise neve a cabo el projectoral incineros. en Laros - Hay mohos deternantos, tomas en cunta. No es "posto que mustro publo 599 sendo aparte Olean experimento - iPosto 191 Pichoso en mosto Pueblo, en 165 publicues gra i re tracion a mustro fueblo, en 165 publicues ana incinerador! i Basta ya del i Mo a el incinerador! i Basta ya del abuso,

bo P.R ..

Att. DI with.

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

Dra Carmen 5 Méndez Pediatra Avecibro P.R. 00612

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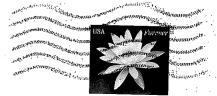
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Lauren Mcgee Rayburn **Environmental Scientist Rus US Department of Agriculture** 84 Coxe Ave, Suite 1-E

Orlando Monzalez Claudio. P.O. Box 683 Vega Baja P.R. OS MON 2015 PM 2 T

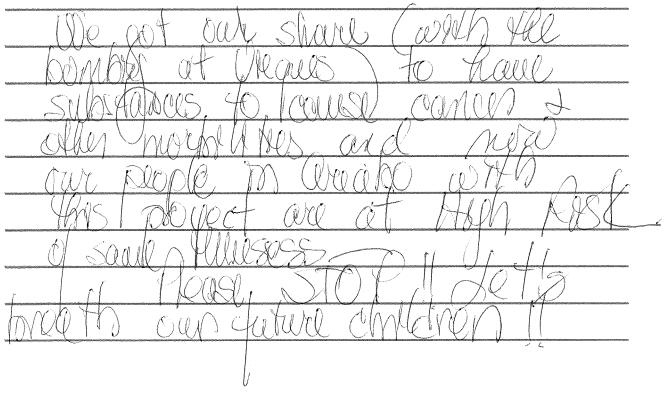
SAR RADIE



Lauren Mcgee Rayburn **Environmental Scientist Rus US Department of Agriculture** 84 Coxe Ave, Suite 1-E 2080134168

Estimada senora McGee:

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



QLAO *.,

Estimada senora McGee:

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

UP N ρ A.

Atentamente,

×.,

Tomas Carlos quiz. P.O. 689 Trio Grande

SAN NIAN PE ONI.

OS MOVEZOES PM 2 T



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

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Alejandro Torres Rivera Fajardo - Puerto Rico

SAM KIAN PR DDB

OS NOW 2015 PM 2 T



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

2980184158

Estimada senora McGee:

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

Convierte à la isla en un productor de gases toxicos daques a la salud y el ambiente.

Jona Co Co Kain

Estimada senora McGee:

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Me opongo a que su agência le autorice (financiamiento a un incinerador porque: Helando Joives River rNO

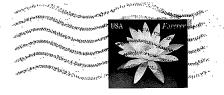
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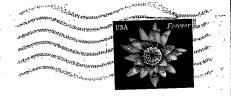
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Lauren Mcgee Rayburn Environmental Scientist Rus US Department of Agriculture 84 Coxe Ave, Suite 1-E Asherville, NC 28801

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

Pivra E. Rivera Sotomagor Jares, Puerto Rico

Estimada senora McGee:

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

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Atentamente, of CA 1CtC

Estimada senora McGee:

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

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tris M. aporte Rivera Arecipo P.R. 00612

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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,

Estimada senora McGee:

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

es divino a la salud y al ambiente de las ciudadanas

Inis M. Aponto

Damaris Chico Pames (fel. 398-0421) ,787-Arecibo, P.R. 00612

OS MOV 2015 PM 2 T



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

Avecibo P.R. DOLGIZ

SAN MARY PRODUCT

05. MOM 2015 PM 2 T



Lauren Mcgee Rayburn Environmental Scientist Rus US Department of Agriculture 84 Coxe Ave, Suite 1-E Asherville, NC 28801 2000134150

Estimada senora McGee:

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

El Propocto es destino a la salud del pueblo. Atentamente, 2 Luis A. Basona . . .

Estimada senora McGee:

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

no para Cho 1 LAR 200 XŒ VERBUSING AND A STATE

Atentamente,

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Baracotey Rivera Utuado, P.R. 00612 347-281-2837 (tel)

SAN MARY PRICE

05. MOX 2015 PM 2 T



Lauren Mcgee Rayburn Environmental Scientist Rus US Department of Agriculture 84 Coxe Ave, Suite 1-E Asherville, NC 28801 2000134160

E. Davila Arecibo P.R. DOCH

SAR MARY PRICE

OS MOW MILS PM 2 T



Estimada senora McGee:

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

Porque Noui y me cricen Arecibo y mijente estaba Sou dable antes de LAS FACTORIAS y ahora quieren castigar amijente con mas air polotants. Noes justo.

Baracuter Rue 347-281.2837

Estimada senora McGee:

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

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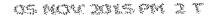
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Lauren Mcgee Rayburn Environmental Scientist Rus US Department of Agriculture 84 Coxe Ave, Suite 1-E Asherville, NC 28801

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

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Estimada senora McGee:

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

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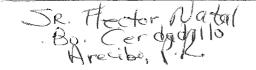
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Estimada senora McGee:

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

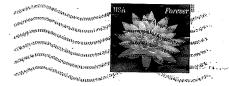
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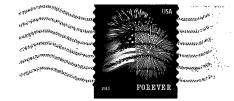


Lauren Mcgee Rayburn Environmental Scientist Rus US Department of Agriculture 84 Coxe Ave, Suite 1-E Asherville, NC 28801

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

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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,

Hector Natal

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Estimada senora McGee:

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

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Dr. Marnon Capella Actuitor, P.R.

Italina Parario Planamenta Parto, Puerto Rico SAN KAAN PROOF

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

SAN KAAN FRICKIJ



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

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Estimada senora McGee:

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

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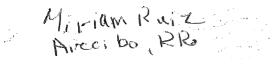
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Estimada senora McGee:

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

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

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Matasha Negron Lofs P. O. 1304 14107 Arecibo, P. R 00613

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

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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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Nector Luis Asquera Moviniento Ind. Macional Hospsian Que Condalucia Punto Nuevo, Punto Picc

SAN RIAM PROOF

05 MOV 2015 PM 2 L



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

2860134168

Carlos L. Ruiz Aneiso P.R. 00612

SAN JUNH PR. 000

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

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Estimada senora McGee:

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

E) romento es clazino a la salud.

Pes. 3. Dector

Estimada senora McGee:

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

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Atentamente,

Arecibo P.R. 00612

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

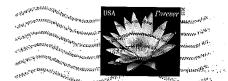
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Estimada senora McGee:

Me opongo a que su agencia le autorice financiamiento a un incinerador porque: aire ave respirances seva aver afectade la cal En pleno Siglo XXI. y conociendo neartivament Que conno sociedord PRILE aavas herris Tor tenennuls sul 2 61 Armeia in erry un cambic radien PSEIA a.M. 100 offrand TINUA Vno CON to acho a w Mos han truis MOS EACONTRA MASS hoy did

Elisq Sanchez Torres Arecibo P.R. 00617

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Martin Cubian Arecibo P.R 00617

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Lauren Mcgee Rayburn Environmental Scientist Rus US Department of Agriculture 84 Coxe Ave, Suite 1-E Asherville, NG 28801, 1999, 199

23 de Septiembre 205 Lauren. McGee Rayburn RUS

.. Estimade Sra. McGee:

Por este médio deseo expresarie mi total trechaizo a la installacións de una Planta de Incineracións en el pueblo de Arecibo, Puerto Rico. Puerto Rico no necesita una plante de incineración, que contamine nuestros aire y suelo, además el uso de agua excesiva en este proceso desmerece la calidad de vida para los puertorniquenos. Necesitam aque para la adjointation y consumo mémante. Plantas de Reciclaçãe de composta, vidrio, y alumunio penificiaria a nuéstra economía; à là protección del medio ambiente y las comunidades costeras de là zona monte. NO Al Incinerador, NO a los 800 millones para Contaminar NO; basta el albuso a las comunidades. Elisa Sanchez Tomu AMA.R.

Seño Mc Gee RUS La presente es para informarle Milestro total y absoluto rechazo a la construction del incinerador de Arecito. El musmo no solo representa una amenaiza para la Salud de los residentes aledonos al incineradors, siño tambien al impacto ecologico y ambientel que el misnie sapone Fanto para la flora como pera La faura de la 2010 non deste da Parto Rico. Este impacto no ses es comparable en terminos fo beneficios que podreon sucederse como resalitado de la construcción del Intérnerador. Es machisimo mas alto el impacto negativo que el positivo para la vida humana y ambiento. Atexprente Martin Cobian

Arecibo P.R. 00612

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

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Lauren Mcgee Rayburn Environmental Scientist Rus US Department of Agriculture 84 Coxe Ave, Suite 1-E Asherville, NC 28801 20001244 Asherville, NC 28801

Zulma De Jesús Bo. Coabey Jayuya P.R.

Fauren Megee - raybun. No hace nude por beneficiai puerto Lico, mustra gente massita tener salid. y que vivorus en condiciones, dignes, los que queren have el asecinar y distruir puestes recurson y la Schud del queblo poesto riquemo titto Anado Paiz Cisio Faes huite Ação

Para: Secretario de agricultura fing parteppe (zulma De Jesús) Me opposso al incimiler porque efector I gooberne y la saluel. . р - д

Arecado, P.R. 20 agosto de 2015 R. U. S. - Pept Agnica Hore Estoy objects a que RUS le concerda un prestoro a Energy Thomers para construire Incineradore en Aregido P.R. Senores L Ed daño a causarnos no lo page ningun dinero. Unos serán los culpables de nuestras miseras Vidas. Eldaño que causará a nuestra población no puede com pensonse con ningún dinero. el poestamo le están dande dinero para el Véneno que in yotarán en nuentros louerpos No aproveben el prestamo! Demos Vida l' Contribuyan pana Salud y alimentos que es lo que necesitamos Cordialmenter Olga Dris Cuy Rojas HC-101- Box HD46 Arcubo, P.A 60612

Get 26 2015 al juice nerada plugal mydementada para la gents y miestro Jothe opingo vacional merta de menesesalbizn campos & gmail.com Meneses Albizu nabo, 121 na OS NOV 2015 PM 2 T

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 SRS Estoy o puesto a la Incineradora de Energy Answers en Aregido, P.D. por las siguientes razones: OLG Salud Se Adectarg' & P.R. es una ciudad pobre, con un indice de morte li ded por conceres de diferentes clases @ Muchos minos y a duttos padecen de asma Estas entermedadas se agradarán per la contaminacion de la incineración Ulds van a ser calpables al igual que la Energy answers, y servis responsables directos de nue stras entermedades, sia puebon e prestano para la construcción de esta Maguing de la Muerta En Alemania Hitler, Uds. RUS apoyon algo similar Francisco Ruera Romain HC-01-Dox 11043 Aneviba , P.R.