

#002001
11/6/01

Watson, Carolyn D.

From: David Harlos [d_harlos@bellsouth.net]
Sent: Tuesday, November 06, 2001 11:03 AM
To: Hanrahan, Pegeen-Commissioner
Subject: GRU Emissions Controls



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(A MSWord Copy of the following is Attached)

Gainesville City Commission 06 November 2001
Alachua County Commission
Gainesville Regional Utilities

RE: Air Quality Concerns at Deerhaven Electrical Generating Station

Dear Gainesville Citizens:

The following remarks are in regard to the future measures that may be required to reduce emissions from Gainesville's primary electrical generating station at Deerhaven. A considerable number of recommendations have already been provided to the County through the considerable efforts of the Alachua County Air Quality Commission.

I suggest that these recommendations be carefully reviewed because GRU is a primary air pollution source in the County, and is the one source that is most directly controllable.

Since the report was issued I served briefly on the GRU energy advisory board and I have the following comments on several issues that were considered by the board.

GRU Fine Particulate and NOx Emission Controls
GRU recently commissioned a feasibility study of air pollution control alternatives. Others have critiqued this report and I understand that there has been some GRU response.

EPA studies of the directly linking deaths from fine coal and diesel particulate continue to be supported by new research and by challenge reviews of the original studies. These deaths are not among persons whom were previously sick but appear to be caused by as yet unknown links between air pollution and sudden cardiac deaths. The medical issues are complex and include findings of inhaled coal fine particulate inside of heart tissue of victims. Nevertheless, the health-based, fine particulate standard will probably impact Deerhaven, which is close to a rapidly section of the County.

GRU NOx emissions no doubt have a regional impact on ozone levels, which have been close to current regulatory limits (see Air Quality Commission Report). Elsewhere in Florida, the Southern Company has taken steps to reduce its NOx emissions by half at its Gulf Power Co. plant, in the more polluted Pensacola area. While GRU may not yet be required to take this measure, the combination of the fine particulate problem and moderate ozone levels may require action on both of these contaminants in the future.

I recommend that GRU continue its efforts to identify air pollution control alternatives that simultaneously reduce NOx and fine particulate as these concerns continue to loom large in the County's future.

Alternatives to Direct Pollution Control: Energy Conservation

The energy crisis in California demonstrated that energy conservation is still a powerful source of pollution reduction. Deferred power plant construction in California was in part blamed for this crisis. California was able to defer construction of plants for years partly because it leads the nation in energy conservation. This parallels California's lead in motor vehicle emission control. It escapes most people's notice that California has tougher car emission standards that have been blocked by the auto lobby in other parts of the country. Efforts in both of these areas have benefited California citizens and the environment for years.

California implemented additional economic conservation incentives at the time of the crisis, but before these went into effect, there was a 22% drop in demand through voluntary measures. This happened in a state where conservation had been pushed for years. Although GRU prides itself on its energy conservation program, California's example suggests we have done very little mine this extensive resource of pollution prevention.

Energy conservation was occasionally mentioned in the GRU Advisory Board meetings but a fundamental conflict of interest prevents GRU, and perhaps the County, from taking energy conservation seriously, namely, the County is supported on energy sales revenue. Energy conservation reduces County revenues. This conflict needs to be faced squarely and resolved, because it prevents us from acting in the best interests of County citizens and the environment in utilizing the powerful economic and environmental benefits of a serious energy conservation program.

I recommend that the air pollution control alternatives review examine the economic and environmental benefits of energy conservation in the same economic framework as installed controls.

Everglades Alternative Energy Project

GRU is considering investing in a biomass energy project in a former section of the Everglades. This steam generator will burn an exotic grass to produce energy. I asked GRU about the invasive characteristics of the plant and was assured that it was "okay". Many such exotic plants have cost the U.S. billions of dollars in subsequent control and damage costs (Malelucca, Cogon grass, Kudzu, etc.) because of irresponsible introductions. It is very difficult to evaluate the invasive characteristics of such introductions, but the glowing terms describing the rapid growth of this plant suggest to me that it is indeed invasive, and it will be used in the Everglades, which may already be terminally imperiled by so many other factors.

I recommend that GRU suspend its support of the biomass to energy project until it has a review in hand from at least the biologists and academic researchers on the Florida Exotic Pest Plant Council on the suitability of this plant in its currently proposed setting.

Respectfully,

David Harlos, Sc.D.

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618 Northeast 9th Avenue
Gainesville, FL 32601
352 375 8797
d_harlos@bellsouth.net

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