

Comments re: UNC Cogen plant and pellets proposal

My name is Kathy Kaufman, here representing the Orange Chatham Group of the Sierra Club. I'm also retired from a 29-year career doing air quality policy at the EPA in RTP.

Let me start by saying that the UNC plant is a longstanding issue and an old, large system. And there are no longer pure solutions in environmental management; it is a matter of weighing trade-offs to determine the best possible practicable outcome.

With this in mind, we urge you to reject UNC's request to burn waste pellets. The issue here is whether to replace a known problem, coal, with a possibly worse problem, waste pellets which contain plastics. The known problem is not ideal, but the plant meets standards and is efficient. The unknown problem could be worse.

Long term, we want to see UNC decarbonize. We know this is complicated, as the plant provides more than electricity – it provides steam and chilled water to heat campus buildings and serve the considerable needs of the UNC Medical Center. We would **not** want the plant replaced with gas boilers in each building.

Nevertheless, we believe that UNC must invest in finding an appropriate long-term solution that doesn't include burning problematic waste pellets, even as an ostensibly stop-gap measure. We say "ostensibly", because although UNC has presented its plan to burn pellets as a temporary pilot, nothing in the draft permit will limit UNC to a pilot period—it is a standard permit modification that allows UNC to burn pellets for the length of the permit term, which could be renewed. If this permit modification moves forward, it should be revised to reflect this is a pilot and be limited to a temporary period.

In addition to climate concerns, we have significant local air pollution concerns with the burning of pellets consisting of waste paper and 15-49% plastic.

The biggest issue with this is that while the plant meets present standards, we know that burning pellets will introduce uncontrolled and unquantified emissions of toxic PFAS into the air.

We don't yet know the impact of that uncontrolled PFAS, and as of yet, there are no Federal or State air emissions standards for PFAS.

We are also concerned about the increased emissions of harmful pollutants like NO_x, carbon monoxide, volatile organic compounds, and lead. These pollutants have well-studied, serious health impacts. This is of significant concern to the local community, which includes Chapel Hill's oldest black neighborhoods and the UNC campus and hospital.

Therefore, we believe that the permit changes should not be allowed until the health risks of PFAS are better understood or estimated, both from the air emissions and from the residual waste ash, as compared to the present system.

Finally, phasing out solid fuels altogether would eliminate the train now carrying coal, with its emissions, and we could use the rail line for other community purposes, such as a bike/ped route from campus to county. This would help reduce air pollution overall and improve our quality of life.

Thank you very much for the opportunity to comment.