

International Brotherhood of
BOILERMAKERS • IRON SHIP BUILDERS

SUBORDINATE LODGE NO. 13

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October 11, 2016

The Honorable Gene Yaw
Chairman, Senate Environmental Resources
and Energy Committee
362 Main Capitol
Harrisburg, PA 17120-3023

Chairman Yaw,

Thank you for allowing me the opportunity to offer comments for the record. My name is Martin Williams and I am the business manager of Boilermakers Local 13, Philadelphia. Boilermakers Local 13 represents nearly 700 active members residing throughout Eastern Pennsylvania and Delaware. For over 90 years, we have proudly offered our services through our associated contractors to customers in the power generating, oil and gas, chemical, steel, and paper industries.

Pennsylvania's history is filled with examples of how one of our state's most abundant energy resources helped meet the needs of the nation. From manufacturing and power generation to national defense, coal has been an integral part of our country's growth and success. Unfortunately, another part of the legacy of Pennsylvania's coal industry is the existence of coal refuse piles covering thousands of acres of land across the state. Unreclaimed coal refuse piles have caused and continue to cause significant harm to our state's environment through acid runoff and the release of pollutants from uncontrolled coal fires.

While it is possible for coal refuse piles to be reclaimed through the planting of vegetation, we believe the most effective method of reclamation is through the use of coal refuse as a fuel source for power generation. Cogeneration facilities which use waste coal as a fuel source utilize circulating fluidized bed (CFB) boilers to achieve efficient combustion while greatly minimizing emissions of SO₂, NO_x and other toxic air pollutants. Additionally, the residual ash from the generating process is used to backfill abandoned strip mine pits and eliminate further acid runoff. According to the Anthracite Region Independent Power Producers Association, or ARIPPA, over the last twenty years, member cogeneration facilities have consumed more than 200 million tons of coal refuse, assisting in the reclamation of more than 7,000 acres of land.

Waste coal facilities also provide substantial economic benefits to the communities in which they reside. In its recently published report, *Economic and Environmental Analysis of Pennsylvania's Coal Refuse Industry*, ARIPPA estimates that the coal refuse industry supports 3,600 direct and indirect jobs—including those of our members currently performing maintenance work at the Gilberton Cogeneration Plant—with an annual economic impact of \$740 million.

However, as a result of regulatory and market pressures, the coal refuse industry is experiencing some considerable challenges. Low natural gas prices combined with rising

operational costs have placed many coal refuse facilities at a competitive disadvantage. Also, compliance with new requirements under the Cross-State Air Pollution Rule (CSAPR) and the Mercury and Air Toxics Standard (MATS) Rule could lead to plant closures since EPA currently does not provide credit for the environmental benefits generated from facilities using waste coal.

Pennsylvania's waste coal facilities offer a unique and important environmental benefit while producing electricity in a responsible way and sustaining thousands of industry jobs. We encourage the General Assembly to continue to support the use of waste coal cogeneration facilities as the primary method of coal refuse pile reclamation. We also applaud the recent passage of new tax credits promoting the use of waste coal as a fuel source for power generation. Further, should EPA's Clean Power Plan be upheld, we ask the General Assembly to work with DEP in developing an implementation plan which acknowledges and accounts for the significant environmental benefits of waste coal cogeneration facilities.

Once again, thank you for the opportunity to share our comments on this issue. Please contact us if you have any questions or need any additional information.

Regards,

A handwritten signature in black ink, appearing to read 'M Williams', with a large, stylized flourish at the end.

Martin Williams
Business Manager/Secretary-Treasurer
Boilermakers Local 13, Philadelphia