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RE: Cricket Valley Energy Proposal located at Route 22, Town of Dover,
Wingdale, NY
Scoping Document Comments

TO: Christopher M. Hogan, Project Manager, NYS DEC

My husband and I are home owners and taxpayers in the Town of Dover and submit comments below on the proposed Cricket Valley 1,000 MW electric generating facility to be located at the old Mica Plant campus.

We appreciate your holding two scoping sessions in the Town of Dover, and especially an additional one on Saturday, so that folks have a chance to voice their concerns.

The Site:

The 1999 Chazen Companies study of the Harlem Valley aquifer indicates that the Harlem Valley towns from Amenia to Patterson all share the same aquifer, which provides water for 20,000 people. Possible aquifer contamination is a very serious concern.

The old Mica Plant site which will house Cricket Valley as well as Rasco Materials, (a petroleum contaminated soil processor), has a troubling past history. Therefore, based on the past history of this entire property, the whole site needs to be evaluated and not only the Cricket Valley portion but Rasco Materials portion as well.

In the past it has been reported that some type glue material was put into deep injection wells at this site. I think this should be investigated. In late 1990's, there was a 3-day fire at the tire recycling facility then at this location which left contamination and perhaps still in the soil and water.

CEO George T. Hearn's letter of May 5, 2010 reports to the Town Planning Board in response to their inquiry as to drums on site, "As for the unknown substances, I will not speculate as to what they are. If there are concerns then a qualified individual or firm should be retained to examine and test these materials to determine if they are hazardous." The drums may/may not be on the Cricket Valley site but it is all one common area. Also see attached letter from Planning Board to Regional Director William Janeway re drums on site. You may also view information re this site on the town web site under "Rasco Site Plan Application Information."

Another company, TT Materials, now Rasco Materials, a petroleum contaminated soil processor had numerous DEC violations for storing PCS in an outside uncovered area and other DEC violations. Some of the processed PCS material, known as "Earth Pave" has also been used as fill in different locations in the Town of Dover as well as in a wetland area in Pawling, not in accordance with its DEC permit. Since past behavior is the best predictor of future behavior, Cricket Valley needs to evaluate how Rasco Materials may affect their operation, if violations occur, especially if it impacts ground water or contains MTBE.

Cricket Valley should be aware that even though Rasco has a DEC permit, the Town of Dover Code does not (**currently**) permit the use of this (BUD) product in our Town, so Cricket Valley is prevented from using it for paving as is any other entity in the Town of Dover.

I believe that this site warrants some very serious investigation, as to whether the water at the location is already contaminated and whether contamination has already leaked into the soil and into the adjacent wetland and into the aquifer.

Air Quality:

The air quality of the Harlem Valley is rated as poor and currently deemed harmful for quite a number of days each summer. So, the proposed facility with its tall chimneys will be contributing to the poor air quality. As well, the adjacent Rasco Materials operation, which has a DEC permit (BUD) to process petroleum contaminated soil will also be emitting pollutants into the air, although it does not appear to have a DEC air quality permit, which I find puzzling. The Harlem Valley is a very narrow valley and subject to frequent air inversions, a fact which local hang gliders have also long reported. In addition, both Cricket Valley and Rasco materials are located between the Wingdale Elementary School and the Dover High School as well as close to numerous quite large housing developments. The DEIS should list all the pollutants and evaluate the effects on the Harlem Valley as a whole, since it is subject to frequent air inversions and already is subject to poor air quality.

Is there asbestos or mica dust from previous operations which will be disturbed or become airborne at the site?

Cricket Valley should also evaluate the health impact of emissions from the petroleum contaminated soil at the adjacent Rasco Materials plant on Cricket Valley construction workers and future permanent employees.

Water Supply and Aquifer

My greatest concern with the Cricket Valley project is the water we all require and need to maintain. The 1999 Chazen Companies study of the Harlem Valley aquifer indicates that the Harlem Valley towns from Amenia to Patterson all share the same aquifer, which provides water for 20,000 people

Cricket Valley will be using a huge volume of water and the continued drawdown of water raises great concern for depletion of the aquifer. The not yet built 1,376 units Dover Knolls project will also be drawing large volumes of water from the same aquifer, as well as other proposed large developments (i.e.: Windrose). What will be the cumulative effect on the aquifer we all share? and on the slow moving Swamp River and Great Swamp (a designated CEA), second largest wetland in the State of NY? Will our aquifer be negatively impacted and water table lowered? Will the Great Swamp and Swamp River just dry up?

The Great Swamp and Swamp River provide economic benefits and valuable resources to all the towns through which it wends its way, both north and south. It provides recreation, canoeing, fishing, hunting, and great scenic beauty, habitat for numerous critters and plants, all attracting the tourist business, as well as a safety net for flooding. Tourism is a big business for Dutchess Co. If the water is depleted, we stand to lose all of this as well as the essential water in our individual homeowner wells creating economic hardship.

And, since the site on which Cricket Valley and Rasco sit, is most likely contaminated, will the huge drawdown of water draw in the contaminated water? and spread it through the aquifer?

Because of the numerous possible serious water impacts, I would request that a well respected expert hydrogeologist, such as Russell Urban Mead be retained to evaluate this matter and not the Town Planner.

Traffic:

Rt 22 is a very busy 2-lane truck route with few passing lanes. We already have numerous gravel trucks, entering and exiting along Rt 22 in our town, then add Dover Knolls site under construction with heavy truck

traffic in and out, now add Cricket Valley under construction, large trucks in and out, and Rasco trucks filled with PCS, in and out of the same driveway as Cricket Valley, sometimes crossing southbound traffic, with no ability of northbound trucks and traffic to bypass them, as well as school busses from the adjacent schools in and out. It seems that a passing lane may be necessary or a traffic light. There should be a cumulative traffic study for our Valley.

Safety:

Most of us are aware of the huge explosion and tragedy at the Middletown, Ct. gas fired power plant. Safety needs to be addressed by Cricket Valley and especially since the facility is close to the Dover High School and Wingdale Elementary school and residential communities, as well as Con Ed transmission lines and the Iroquois gas transmission line. Also, is our small rural fire company equipped to handle this possibility? How will Cricket Valley be prepared to handle such a situation?

Miscellaneous Questions/Comments:

Admittedly gas is a clean fuel. However, I would be remiss if I did not mention the source of some of the gas which is from fracking. The process of fracking has left communities in upstate and nearby Pennsylvania areas without pure water to drink and contamination and without a way to survive in their communities. It is unconscionable. Some of the situations are heartbreaking so I cannot condone such an unethical, heartless method of obtaining fuel which leaves disaster and devastation in its wake and I cannot condone or support it.

Cricket Valley will not provide power for this community but may provide economic benefits for the community in the short term and hopefully real estate taxes in the long term. However, that may be offset by the need for emergency and fire services, road maintenance all funded by the taxpayer as well as increased air pollution, decreased water availability and/or contaminated aquifer.

It was stated that the construction employees will be bused in. Where will they be bused in from? Will they be undocumented workers? and from what areas and towns will the workers be drawn from? Will any construction workers be Union employees? Will the permanent employees be Union employees? Will there be sanitary facilities available for the construction workers, if so, what type? If they are bused in, where will they purchase their lunch or break time coffee since not everyone wants to or is able to bring lunch with them?

It is worth noting that there are several preserves properties in fairly close proximity to the Cricket Valley site. There is the Mostachetti preserve on Co. Rt. 21 and the adjacent Oblong Land Conservancy property. Both provide critical habitat and both will be affected by lowered water levels.

Thank you for the opportunity to submit scoping comments.

Respectfully Submitted,

Evelyn Chiarito and Joseph Chiarito

