

December 7, 2008

Ms. Janine Tulloch-Reid
SE Air Quality Engineer Manager
PA Department of Environmental Protection
2 East Main Street
Norristown, PA 19401

Re: Title V Operating Permit Renewal, Limerick Nuclear Power Plant – Permit No. 46-00038

Dear Ms. Tulloch-Reid,

I have just read a copy of the Title V /State Operating Permit No; 46-00038 for Limerick Generating Station, stamped PROPOSED and undated, I assume the document referenced on 11-14-08 ad in the Pottstown Mercury is this document.

Following are observations and comments for the record and to which we expect answers PRIOR to issuance of the Title V State Operating Permit. Replies should be received with time for us to further comment in a meaningful way.

1. It is our belief that the so-called "Limerick Generating Station" generates NUCLEAR power and that therefore radiation and RAM are at the site and likely to be emitted in to the air. There is no recognition of this in the proposed permit that we read. Why not? Please explain in detail.
2. As we all know, there is no safe level of exposure to radioactive materials.
3. Steam comes out of the cooling towers into the air. We believe there are serious pollutants in this steam, some of which are chemical and radiological, i.e. Iodine 131 and Radioactive Crypton are in it. Drift from this steam probably includes chlorine, bromine, and anti-rust additives, as well as chemicals in the river water. This drift can and does blow far away. At Maine Yankee it was proven in discovery in court that there were drift droplets one mile downwind of the plant. The droplets contain what is in the system. When the droplets hit land they dry and blow around. There is sewage effluent in the river. The droplets probably contain pathogens and heavy metals from this effluent. NONE of this seems to be recognized in the PA DEP PROPOSED TITLE V PERMIT. Why not? Please elaborate.
4. What is the proposed effective date for the Title V State Operating Permit?
5. Are the emergency generators burning diesel fuel? We believe that diesel generators produce major air pollution. This seems to be ignored, at least in the PROPOSED version I read. Why? Please elaborate.
6. What happens to wastes from Limerick Generating Station? Since no mention is made of an incinerator which might burn mixed waste, i.e. rags, etc., we need to know where these wastes are going, especially since burning of certain things is permitted in the Title V at this place. Can buildings that are demolished be burned without testing for radiation? Open burning of what? Is the soil at this place radioactive? Does it contain blow pollutants, etc. Please explain.

7. Permit maps (p.4) The average person cannot make out anything about these "maps". There are too many initials. These are diagrams of something. What?
8. Is this proposed permit the same as the existing permit? If not, how does it differ?
9. We trust that sampling, testing, and monitoring will take place within a 10 mile radius of Limerick Nuclear Generating Station. If not, why not? No wind roses are shown, etc.
10. Can radiation releases be part of emissions trading?
11. What is burned in the boilers? Is there ash? What becomes of the ash?
12. What is the spray pond and what can go there, and where does it come from? Once something is in this pond what happens to it? Is it cleaned out? P.39 This is pretty vague and lenient for a nuclear power plant permit. We should know the answers about WOLF and spray ponds PRIOR TO APPROVAL.
13. What happens to the degreasing waste? Is it Radioactive? Can it be air borne?
14. P. 42 003 ©)5) Where do the contents of the cleaned up spills go? Can they be radioactive?
15. Not all sources are covered in the Title V State Operating Permit in Section D. Most sources are not covered. Why not? This ignores radioactivity in the air releases. The is vague, especially for the spray pond.

We ask for answers to this letter with time for us to review and comment PRIOR to approval. Finally, we fully subscribe and concur with comments that are being finalized and will be submitted within the two weeks by The Alliance For A Clean Environment.

Sincerely,

Pennsylvania Environmental Network
Tina Daly

Cc: Governor Rendell
Andrew Dinniman, State Senator
John Hanger, Acting PA DEP Secretary
EPA Region III, Air Toxics
Carol Collier, DRBC