

Comment #	Comment	BLM Response
		<p>requirements for waste rock, overburden, and ore characterization and evaluation and for ecological risk assessment for proposed mining projects, including for disposal of naturally-occurring radioactive material from mining operations. NDEP mining regulations do not require or anticipate separation of naturally-occurring radioactive material prior to disposal of mining and processing wastes. Drainage from the CTFS would not discharge to groundwater or surface water. The Thacker Pass facility Clay Tailings Filter Stack is being designed as a zero-discharge facility as defined under Nevada regulation NAC 445A.385. “Zero discharge” means the standard of performance for the protection of surface waters which requires the containment of all process fluids.</p>
P258	<p>112) Enormous amounts of carbon emissions will be generated as well, 132,588 tons a year in phase 2 at the plant and another 10,325 in transport (DEIS 2-72). This equates to two tons of carbon emissions per every per ton of lithium generated. This doesn’t equate to a clean energy future.</p>	<p>As discussed in Appendix K, LNC anticipates that use of the lithium in batteries could contribute to downstream GHG emissions reductions. BLM has reviewed this information and determined that further detailed analysis of downstream GHG emissions from the end uses of lithium-based products would be speculative (see EIS Section 4.9.1.1).</p>
P259	<p>113) Claims of carbon neutral are not supported. The basis of carbon neutral claims are the act of burning sulfur waste from oil refineries. The very reason sulfur was removed in the first place is so we don’t burn it in our cars. Burning sulfur creates pollution and removes oxygen from the air. Removing oxygen from the air thins the atmosphere and increases carbon concentrations.</p>	<p>The EIS does not claim that the project would be carbon-neutral. Rather, Appendix K states, “A long-term goal of the Thacker Pass Project is to reduce GHG emissions and reach carbon neutrality.”</p> <p>Any GHG reductions associated with the project would not be related to the source of sulfur supplying the sulfuric acid plant. As discussed in Appendix K, the sulfur is burned as part of the process for producing sulfuric acid and the combustion products are used in that process, not emitted to the atmosphere. Some emissions of sulfur compounds would occur and would be controlled by a tail gas scrubber.</p>
P260	<p>114) The DEIS erred in presenting unsupported carbon reductions allegedly produced via steam production. In the DEIS appendix K states “It is estimated that steam generated from the sulfuric acid process reduces approximately 200,000 tpy of CO2e in Phase 1 and 400,000 tpy of CO2e in Phase 2”. Yet there is no documentation to evaluate the accuracy of this estimate. Moreover, the offset argument relies on a natural gas plant shutting down to provide the offset. There is no support for any agreement to make this happen. In fact, this plant may compete with renewables such as solar. The Final EIS should not contain unsupported statements.</p>	<p>The source of the CO2 estimate is cited in Appendix K (p.205). The estimated CO2 reduction represents foregone (avoided) emissions compared to the emissions from using natural gas to generate steam. The estimate does not rely on an existing natural gas plant shutting down. Rather, it represents the additional natural gas that would be required to generate steam if the steam produced by the sulfuric acid production were not available.</p>
P261	<p>115) This plant will cause the generation of over 140,000 tons of carbon emissions, and additional emissions from burning hundreds of thousands of tons of sulfur on an annual basis. Bringing this massive amount of pollution to our community will not be eco-friendly or green energy.</p>	<p>As discussed in Appendix K of the Draft EIS, although the project would produce GHG emissions, LNC anticipates that use of the produced lithium in batteries could contribute to downstream GHG emissions reductions.</p> <p>As discussed in Appendix K of the Draft EIS, the sulfur is burned as part of the process for producing sulfuric acid and the combustion products are used in that</p>