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**Kentucky Pioneer Integrated Gasification**
**Combined Cycle Demonstration Project**
**Draft Environmental Impact Statement**
**U.S. Department of Energy**
**National Energy Technology Laboratory**

## Written Comment Form

*Must be received by January 4, 2002.*

SIR,

PLEASE find enclosed
My Written Comments.

Will Herrick
4859 FLAT MARY Rd
CAMPTON, KY
41301

Please use other side if more space is needed.

Comment forms may be mailed to:
Mr. Roy Spears
U.S. Department of Energy
National Energy Technology Laboratory
3610 Collins Ferry Road
Morgantown, WV 26507-0880

Comment forms may be faxed to:
Mr. Roy Spears
(304) 285-4403

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**Comments on the Kentucky Pioneer IGCC Draft Environmental Impact Statement**

Will Herrick
4859 Flat Mary Rd
Campton, Ky 41301

January 22nd, 2002

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Mr. Roy Spears
U.S. Department of Energy
National Energy Technology Laboratory
3610 Collins Ferry Road
Morgantown, WV 26507-0880

Sir,

I have the following comments on the Kentucky Pioneer (KP) Integrated Gasification Combined Cycle (IGCC) Draft Environmental Impact Statement (DEIS).

There are manifest virtues to the promotion of our national understanding of advanced power generation technologies. However, significant flaws and omissions in the DEIS negates both the DOE assessment that this plant meets DOE's stated needs and the conclusion that it should be funded. The DEIS lacks critical information about the plant design that makes it impossible to assess the environmental impact of the Trapp facility.

The DEIS needs repair and a new round of public review before any Federal dollars are released.

The Federal issues of concern in this DEIS are:
- Weak argument: 'Purpose and Need for Agency Action.'
- Compromised demonstration of 'Clean Coal'
- Flawed premises: 'No Action Alternatives'
- Failure to consider other sources of power.
- Likely failure to get local permits.
- Conflict with state law.
- Intent to disregard the outcome of the research.
- Unreliable partners, private funding delays, inadequate planning & past failures.
- Disregard for social justice and environmental issues.
- Inadequate design data.

**Weak Argument: 'Purpose and Need for Agency Action.'**

The need for agency action is not well supported by the DEIS. As well, goals described as the basis for the proposed actions may have already been met without investment of Federal dollars.

The need for a successful demonstration of a largely coal fired IGCC facility using Federal funds, as stated in the DEIS section 2.2, is already satisfied by available information. Global Energy is building an MSW fired IGCC plant identical to Trapp, but for the fuel cell, in Lima Ohio without Federal monies.[1] The National Coal Council has said 'The technology has been successfully demonstrated at commercial scale in the U.S. and worldwide.'[2] Existing facilities include Wabash River,

1 RA Bailey, Sr VP Global Energy, Panel Discussion, Oct 9, 2001 www.gasification.org/98GTC/GTC01030.pdf
2 Appendix I:

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3/14 (cont.)

**Comment No. 1** **Issue Code: 14**

DOE believes that the Kentucky Pioneer IGCC Demonstration Project EIS adequately analyzes the full scope of environmental impacts from the proposed project. Chapter 3 of the EIS has been revised to provide more detail on the gasification process, including the production of the vitreous frit. Detailed plant design is not available or neccessary at this point because the project is still in the planning stage. It will not be available until after the issuance of the ROD.

**Comment No. 2** **Issue Code: 21**

DOE believes that the EIS fully addresses all impacts of the Proposed Action and no action alternatives, as required by NEPA. The public comment period was extended through January 25, 2002. DOE will consider all public comments before issuing the ROD. The ROD will be issued no sooner than 30 days after the Final EIS is distributed and a notice of its availability is issued.

**Comment No. 3** **Issue Code: 14**

The stated goal of the CCT Program is to advance DOE's mission to foster a secure and reliable energy system that is environmentally and economically sustainable. As such, the CCT Program was established to demonstrate the commercial feasibility of CCTs to respond to a growing demand for a new generation of advanced coal-based technologies characterized by enhanced operational, economic, and environmental performance. Since coal is an abundant, secure and economical fuel, and is used to produce over 51 percent of the electricity in this country, it must continue in its role as a key component in the United States and world energy markets.

The Kentucky Pioneer IGCC Demonstration Project utilizes the BGL oxygen-blown, fixed-bed slagging gasifier. The gasifier fuel will be a high-sulfur bituminous coal and blended with RDF, which uses only MSW as its basic component and does not use any hazardous or industrial waste. The syngas generated in the gasifier will

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Tampa Electric's Polk Plant, the Netherland's Buggenum, plants in Germany, Scotland, Singapore & South Africa and Spain's Puertollano plant. Global Energy already has several commercial IGCC projects under development based on using BGL Gasification Technology to gasify solid hydrocarbons for power production (Appendix E, Introduction, paragraph 2). The National Coal Council reported in May 2001: 'Based on the success of the BGL process at the Schwarze Pumpe GmbH plant in Germany, Global Energy is building two plants in the U.S. The 400-MW Kentucky Pioneer Project and the 540-MW Lima Energy Project will both use BGL gasification of coal and municipal solid waste to produce electric power.'[3]

The fuel cell demonstration at Trapp is more about MSW than Clean Coal. When presenting their Trapp proposal at a national coal conference, the company providing the fuel cell technology to Kentucky Pioneer Energy(KPE) said: 'Fuel cell systems operating on coal have been studied extensively in past years.'[4](p.3) Later in the paper they go on to say of the Trapp facility: 'The project will feature Advanced Fuel Technology briquettes made of Kentucky coal and Municipal Solid Waste (MSW) as fuel in the gasification process...'(p.5). These facts indicate that the purpose of the demonstration is not the already well researched coal powered fuel cell but, in fact, the MSW powered fuel cell where coal is being removed from the feedstock to favor MSW. This fails to satisfy the expressed goal of DEIS section 2.2 for: '...technologies that will help alleviate pollution problems from coal utilization.' Alleviating coal pollution problems by not using coal is not what DOE & CCT are about.

3/14 (cont.)

The national interest in MSW as a non-competitive alternative to other fuels for energy production is at cross-purposes to the CCT effort at Trapp. The Office of Integrated Analysis and Forecasting of the Energy Information Administration reported in April of 1997: 'MSW-produced power is viewed [primarily] as a byproduct of a community's waste disposal activities and only secondarily as a competitive alternative to other fuels for energy production.'[5] The waste at Trapp is not a byproduct of that community's waste disposal activities, and the MSW is competing with local coal.

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www.nationalcoalcouncil.org/Documents/May2001report-revised.pdf P. 32

3 Appendix I: www.nationalcoalcouncil.org/Documents/May2001report-revised.pdf P. 28

4 Appendix C. Steinfeld Ghezel-Ayagh, Sanderson, & Abens: IGFC Demonstration Test. FuelCell Energy Inc, 25th International Technical Conference on Coal Utilization and Fuel Systems, March 6th, Clearwater FL.

5 DOE/EIA-M069(97) Model Documentation Renewable Fuels Model of the National Energy Modeling System, URL: tonto.eia.doe.gov/FTPROOT/modeldoc/m06997.pdf

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**Comment No. 3 (cont.)** **Issue Code: 14**

be used to fire a gas turbine. This project serves to further CCT Program objectives in the following ways:

1. RDF is an example of a fuel that has the potential to enhance the economics of coal utilization and lower the emissions output of a totally coal-based system. Coal-based systems that have sufficient flexibility to handle a range of fuels will have a competitive advantage over a nonfuel-flexible, coal-only system.

2. Gasification is a more environmentally efficient method to generate electricity from coal. While much was learned from the previous CCT gasification projects (Wabash River and Tampa Electric), the different technology techniques to produce syngas with flexible-fuel co-feeds have not been demonstrated and operating demonstrations are essential to accelerate the widespread use of gasification.

The fuel cell demonstration has been moved to the existing Wabash River IGCC Plant near West Terre Huate, Indiana.

**Comment No. 4** **Issue Code: 14**

DOE selected the Kentucky Pioneer IGCC Demonstration Project for further consideration under DOE's fifth solicitation (CCT-V) of the CCT Program and concludes that the project meets CCT Program requirements due to the first demonstration of a co-fed BGL gasifier and the facility size would be approximately 40 to 50 percent larger than other 100 percent coal-fed BGL facilities.

Because of DOE's limited role in providing cost-shared funding for the proposed Kentucky Pioneer IGCC Demonstration Project, and because of advantages associated with the proposed location, DOE did not

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At what point does the presence of coal become token? Please make a specific answer to that question as it is the sole basis for DOE CCT's investing in the Trapp facility. KPE has said that they intend to use only 20% coal in the feedstock in the long run, 50% or less initially. 'Operation will commence on 100% coal with slowly increasing levels of RDF throughout the demonstration. This method will allow the development of a database of plant performance at various levels of RDF feed.'[6] Using Clean Coal monies for research on MSW/RDF diverts those dollars from their intended purpose.

The Wabash IGCC facility in Terre Haute, operating since 1996, has demonstrated most of the retrofit, repowering, coal, sulfur and NOx related features of Trapp with a similar gasifier from KPE's parent, Global Energy. BG/L facilities are in place in Europe, Singapore and elsewhere. They already offer a wealth of technical, environmental and financial data. A 1988/2000 NETL report, entitled 'British Gas/Lurgi Gasifier IGCC Base Cases', reports the Cost of Energy for IGCC BG/L facilities on pages 25-40[7].

Kentucky already has the lowest energy prices in the nation. From a Federal point of view, siting this plant anywhere else makes more sense in terms of meeting needs. If, (as described in the DEIS page S-3, 'Purpose and Need for Agency Action' paragraph 2), the goal is to 'significantly reduce electric power costs...', it may be most effective to look at sites for this facility where electricity rates are higher.

While Kentucky has the lowest energy costs in the nation, there are many other providers seeking to offer base and peaking capacity in the EKPC market area, to wit: the EKPC Mason County Spurlock Plant proposal introduced above (and many others). Neglecting to consider these other energy sources and providers is a serious omission in the Section 2 of the DEIS, Purpose and Need for Agency Action.

EKPC has proven in the past to seriously miscalculate their power needs. That is how the Trapp site was originally prepared and then mothballed for 20 years. EKPC is adding base capacity outside of this initiative (the Spurlock facility in Mason County), as are others. EKPC's pursuit of the Mason County Spurlock facility (Appendix D) appears to, for the near run, address their '1998 Power Requirements Study', cited as the energy demand component of the 'Need for Agency Action.'

6 P.2 Advanced Electric Power Generation Program Update 2000. May 17th, 2001 URL: www.lanl.gov/projects/cctc/factsheets/updates/documents/advelecigcc_2000_all.pdf
7 www.netl.doe.gov/coalpower/gasification/system/bgl3x_20.pdf

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3/14 (cont.)

**Comment No. 4 (cont.)** **Issue Code: 14**
evaluate alternative sites for the proposed project. Site selection was governed primarily by benefits that Global Energy could realize. Global Energy preferred the proposed project site because the costs would be much higher and the environmental impacts likely much greater for an undisturbed area.

**Comment No. 5** **Issue Code: 18**
After the issuance of the NOI and during the scoping process, a third alternative, in addition to No Action Alternative 1 and the Proposed Action, was identified. The alternative was determined to be a reasonably foreseeable future action. The construction of the proposed project cannot begin until DOE issues the ROD. Consideration of power generated by the Spurlock Power Station is outside the scope of the EIS.

**Comment No. 6** **Issue Code: 14**
An analysis of the use of alternative sources of power is outside the scope of the EIS.

**Comment No. 7** **Issue Code: 21**
The Kentucky Pioneer IGCC Demonstration Project is a federal action selected for the CCT Program. The EIS is used as a tool to decide whether or not DOE should provide funding to the project. If the project is approved, KPE would be required to abide by all local, state, and federal regulations.

The Kentucky Natural Resources and Environmental Protection Cabinet has advised KPE that the RDF is a recovered material, not a waste. The Kentucky Pioneer IGCC Demonstration Project facility will be considered a recovered material processing facility and the gasification process will not require a waste permit as long as the RDF conforms to the statutory definition.

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All the power plant interest in the Commonwealth bodes well for access to capacity in the long run. The base energy demand cited by DOE as justification for Trapp has not been well established, and would not compare well to most other sites where electricity rates were higher.

The case for spending Clean Coal dollars and the need for agency action has not been well made. The fact that the Lima facility is being built without Federal dollars undercuts the argument that the American power industry needs Federal funds to assess the potential of BG/L IGCC systems. There is an abundance of financial information already available. Little regarding coal powered IGCC systems will be learned at Trapp. Trapp is really about MSW, not CCT. Scarce tax dollars should not be spent, as the goals of the Clean Coal program described in the DEIS are already reasonably well met without Federal support, and are not well addressed by the Trapp proposal. Coal pollution abatement by not using coal defeats CCT goals.

**Compromised Demonstration of 'Clean Coal'**

Throughout the Introduction and Background section of the DEIS, the Federal goal is defined. The basis for funding, and the declared purpose stated there is demonstrating clean coal technology.

The summary page S-3's synopsis bundles the MSW derived fuel into the project goals. The inclusion of MSW & it's derivatives are not documented as a goal in the body of the DEIS, however. The entire background section details the chronology of the CCT program and DOE's interest in demonstration facilities. Nowhere is there mention of MSW or RDF fuels.

As presented in the DEIS,there is no Federal mandate for DOE's CCT program to demonstrate a waste-to-energy facility using clean coal monies. It seems disingenuous to label it a coal demonstration when so little coal is involved and in fact coal tonnage is being displaced by MSW. That is entirely contrary to the stated goals.

As designed, this facility is not going to demonstrate 'clean coal'; it is going to demonstrate a waste-to-energy technology. KPE has declared their long-term intention of using only 20% coal in the feedstock, with the rest being derived from distant sources of Municiple Solid Waste (MSW). DOE should justify how Clean Coal monies should be spent on MSW issues that remove coal from the feedstock.

I wrote the following to researchers at the University of Kentucky Center for Applied Energy Research: 'The questions that I have involve the phase states of the constituents as they transport through the gasifier, the gas cleaner, the sulfur recovery process and the turbine combustion. I am specifically trying to follow the transport and chemistry of metals and their oxides, the

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3/14 (cont.)

4/14 (cont.)

**Comment No. 7 (cont.)** **Issue Code: 21**

Chapter 3 of the EIS has been revised to include a more detailed and expansive description of the gasification process. The syngas is not a component of the RDF pellets, but rather a fuel generated from the coal and RDF pellets by a series of chemical reactions within the carefully controlled environment of the gasifiers.

**Comment No. 8** **Issue Code: 21**

KPE is not attempting to circumvent KRS 224 or any other state or local laws. The Kentucky Natural Resources and Environmental Protection Cabinet has advised KPE that the RDF is a recovered material, not a waste. The Kentucky Pioneer IGCC Demonstration Project facility will be considered a recovered material processing facility and the gasification process will not require a waste permit as long as the RDF conforms to the statutory definition.

**Comment No. 9** **Issue Code: 21**

KPE has a contract in place with EKPC to provide power continuously for a 20-year period. The facility would not shut down after the 1-year demonstration period, but would continue to operate to honor the commitment to EKPC. As discussed in Chapters 1 and 2 of this EIS, the performance, technical, and economic data would be used to determine the commercial viability of the co-fed BGL gasifier at other new and existing facilities. There would not be a new round of permitting following the end of the 1-year demonstration period. The PSD/Title V Air Permit issued by the Kentucky Division of Air Quality is final and does not require renewal following the demonstration. At the close of the demonstration period, the KPDES permit for water usage would also be final and not require renewal. Any required fuel feed component changes following the 1-year demonstration period would likely require modification of the air and water permits.

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fate of chlorinated compounds in the feedstock,and the technology applied to clean the synthesized hydrocarbons.' Dr Burt Davis <davis@noah.caer.uky.edu> replied on Tue Jan 8 17:02:18 2002: 'I assume that you are referring to the facility that has been proposed by Global. If that is the case I have a general understanding of what is proposed. Many of the issue[s] that you raise are very complex and would in many cases be specific to the specific facility.' The results of the research cannot be directly applied other BG/L IGCC facilities that do not use MSW. The constituency of the feedstock, the combustion chemistry, the gas cleaning processes, and the resultant exhaust gases and slag will all vary significantly from facilities that just use coal. The value of Trapp as a research facility for Clean Coal is questionable.

DOE has acknowledged that it is normally responsible for a comprehensive review of alternative sites, and that by choosing to partner with Global Energy, the parent company of KPE, they feel relieved of that responsibility. There are several points to be addressed, however. In addition to the comments below, please consider the *Unreliable Partners* section.

Global Energy has other sites in various stages of construction using BGL based IGCC technology[8]. They are a CCT partner in a nearly identical IGCC plant burning coal since December 1995 in Indiana. They are putting an IGCC plant identical to Trapp in Lima Ohio.

To not consider these sites is improper-it is the same partner. The alternate sites appear to satisfy all stated goals of DOE & the CCT projects. Some may use 100% coal which makes them more valuable as CCT demonstrations sites than one that only uses 20% coal. There may well be other sites as well: DOE & the CCT program have IGCC partners as far away as Kazahkstan.

The fuel cell component of the Trapp demonstration is a fraction of 1% of the total energy production. It has already been demonstrated using sulfur-cleaned coal-based syngas. It is a modular technology that could be added to practically any current IGCC facility, and certainly to the Lima plant.

If MSW derived materials are to comprise 80% of the feedstock, sites closer to the source of the MSW need

8 Appendix E. APPLICATION OF BGL GASIFICATION OF SOLID HYDROCARBONS FOR IGCC POWER GENERATION
2000 Gasification Technologies Conference
San Francisco, California
October 8-11, 2000
Presented by:
GLOBAL ENERGY INC.
Richard A. Olliver

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4/14 (cont.)

**Comment No. 10** **Issue Code: 22**

Before any federal funds are obligated, KPE will have to provide proof of finances for construction and operation of the project.

**Comment No. 11** **Issue Code: 13**

The relatively small amounts and generally dispersed nature of MSW in Kentucky does not economically support exclusive utilization of Kentucky generated MSW to produce RDF supplies. Importing RDF from a densely populated metropolitan area is more economically viable in order to supply the necessary amount of RDF required to operate the plant.

**Comment No. 12** **Issue Code: 16**

Detailed plant design is not available or necessary at this point because the project is still in the planning stage. It will not be available until after the issuance of the ROD. All assumptions made in conducting the analyses are detailed in the EIS.

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consideration. Energy prices are higher anywhere else in America, offering a better reward for siting elsewhere.

Without a thorough site review, it is impossible to establish whether the advantages offered by EKPC at Trapp are the best deal for the DOE & the public, or if Federal money is even needed to accomplish the goals presented by the DOE & EPA.

DOE and their current partners may better achieve their mandated goal of demonstrating CCTs at a different BG/L IGCC facility. They should be compelled to make that review. More importantly, DOE may be able to avoid spending taxpayers' dollars altogether while still managing to demonstrate coal based CCTs. It is a serious omission of this DEIS to neglect that opportunity.

4/14
(cont.)

**Flawed Premises: 'No Action Alternatives'**

There is good evidence provided by testimony before the PSC that the DEIS' Alternative 2 needs repair. EKPC's commitments, both present and future, are not accurately established. In the event that they are not as represented in the DEIS, the DEIS needs revision & subsequent public review.

Page S-8 describes the three alternatives analysed under this DEIS. The action described as Alternative 2 has been challenged by at least two documents. As well, personal communication with residents of the community of Trapp suggest that Alternative 2 may already be under construction, changing it's status from 'option' to fact.

5/18
(cont.)

On July 11, 2001, East Kentucky Power Co-Op (EKPC) amended its permit application before the Kentucky Public Service Commission (PSC) because KPE had not met its financial closing deadline of June 30, 2001. Due to the delay in KPE's financing, East Kentucky 'decided that it cannot reasonably rely on that project to satisfy its future power supply needs.' Therefore, EKPC has concluded that it should proceed to construct a 250 MW coal-fired generating unit at the Hugh L. Spurlock power station in Mason County, Kentucky[9]. This facility should be included as part of the DEIS Alternative 2.

The original NOI from DOE for Trapp includes the following: 'Under the no-action alternative, DOE would not provide partial funding for the design, construction, and operation of the project. In the absence of DOE funding, the Kentucky Pioneer IGCC Demonstration Project probably would not be constructed.'[10] Together, the two

9 Appendix D, Minutes of the Kentucky Public Service Commision, Case # 2001-053, September 26, 2001
10 DEPARTMENT OF ENERGY Notice of Intent To Prepare an Environmental Impact Statement for the Kentucky Pioneer Integrated Gasification Combined Cycle Demonstration Project, Trapp, KY and Notice of Floodplain Involvement. 10th day of April, 2000. David Michaels, Assistant

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citations above suggest that all derived components of the DEIS that address Alternative 2 need to address the 250 Mw Mason County facility, and perhaps exclude the alternative as it is now written.

There may or may not be a natural gas fired power island at Trapp already under construction. This may be construction of some peaker units, however. If it is a fact that EKPC has already committed to building the power island, then it is not an 'alternative' but instead, an extant facility and should be dropped from the alternative section of the DEIS and added to the Cumulative Impacts. The residents of Trapp maintain that some construction is already underway.

The Proposed Action section may also need review. EKPC's commitment to the KPE IGCC facility is still contingent on future agreements, and that the DOE's Cooperative Agreement with KPE may be undone in the future by disagreements between KPE & EKPC & the PSC. In September, EKPC testified before the PSC that even 'In the event that KPE is able to secure project financing, East Kentucky stated that certain provisions in the existing purchase power agreement would have to be revised and any renegotiated contract will be resubmitted to the Commission for its prior approval.'

The alternatives offered to the public in the DEIS and scoping process do not represent the real alternatives before them. A revision of the DEIS & a new round of scoping and public comment after the DEIS is repaired is needed.

15/18 (cont.)

**Likely Failure to get Local Permits**

Over the last 15 years, Kentucky has bootstrapped itself into an enviable body of Solid Waste legislation. KRS 224 requires planning and management at both the state and county level for Municiple Solid Waste (MSW) production, reduction, and disposal. This statute provides the legal foundation for local permits. It also defines MSW and Refuse Derived Fuels (RDF).

The MSW being proposed as a feedstock does not qualify under KRS 224 as an RDF, as most of the recyclables (paper & plastics) have not been recovered. See the section *Conflict with State Law* below for more discussion of MSW vs RDF in Kentucky. Further, under KRS 224 there is a 15% limit on RDF in the feedstock before the facility is a waste-to-energy plant requiring local permits.

The language voiced inside the state of Kentucky that has been used to describe the facility differs from that used in the Federal dialog by DOE's corporate partners EKPC and KPE. One wonders if the goal of this contradiction

7/21 (cont.)

Secretary, Environment, Safety and Health. [FR Doc. 00-9301 Filed 4-13-00; 8:45 am]

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is to avoid Kentucky law and the requisite permits from local Clark County government.

The DEIS supports the designation of Waste-to-Energy. On page 3-21, section 3.2.2.1, 'Pellet Manufacturers', it states 'Historically, the waste-to-energy industry has used RDF pellets as a means of assuring effective co-feeding at conventional power plants.' The implication is clear: using RDF is waste-to-energy.

KPE's staff are arguing that they are not burning or combusting the 2500-4000 tons/day MSW derived fuel[11] that comprises 50% to 80% of their plant's feedstock, and that the MSW they are using is no longer solid waste once they have removed only the glass and metals. They are leaving most recyclables in the waste stream for their BTU content, preferring to burn rather than recycle them[12].

It is clear to me that they are burning the fraction of MSW that vaporizes at 3200 degrees Fahrenheit, the syngas. DOE's documents frequently refer to the integrated combustion stage that drives the turbines in IGCC facilities: "...(3) **combustion** {emphasis mine}of the clean syngas in a turbine generator to produce electricity...". As well, it is clear that the facility is a waste-to-energy plant: "The briquettes would be made from high-sulfur coal (at least 50%) and refuse (municiple solid waste)" [13]

Outside of Kentucky, Global has no problem describing the process as combustion. For example, in a description of the industrial process they state: '...sulfur recovery units prior to combustion in the gas turbines, resulting in exceptionally low SO2 emissions. '[14] Please compare this with Mike Musulin's (President of KPE) published

7/21
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11 As proposed, KPE will transport as much as 4000 tons of municiple solid waste (MSW) per day from the East Coast to fuel the waste-to-energy facility in Trapp, Kentucky. This is an amount equal to approximately one half of Kentucky's own MSW production.
12 The sample provided by KPE for public inspection at the EPA EIS hearing on 12/11/01 in Trapp was a 10x50 mm compressed bolus made almost entirely of white paper. A rough guess is that particular sample was at least ¾ recyclable content.
13 DOE's Notice of Intent to Prepare an Environmetal Impact Statement for the Kentucky Pioneer IGCC Demonstration Project, Trapp KY
14 Page 5, Appendix E, APPLICATION OF BGL GASIFICATION OF SOLID HYDROCARBONS FOR IGCC POWER GENERATION
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