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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.

December 27, 2001

Dear Mr. Spears:

Please see the attached sheets for written comments.

Sincerely,

Lisa P. Collins

Lisa P. Collins
2344 Harrodsburg Rd.
Lexington, KY 40503

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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Written Comment Form

The Kentucky Pioneer Integrated Gasification Combined Cycle Demonstration Project should not be constructed near Trapp in Clark County, Kentucky for the following reasons:

1. Kentucky Highway 89, the only artery to the proposed site, is not adequate to carry 500-830 vehicle trips *per shift change* and 40-60 heavy-duty truck trips per day. The road is old and narrow, and many stretches lack adequate shoulders. School children enter and exit school buses all along this route. This project puts school children and area residents at serious risk that cannot be ignored. Carpooling and a turn lane at the proposed site's entrance are not adequate solutions.
2. This is an experimental project. There is no firm evidence that the vitrified frit will not be hazardous. If it is hazardous, the frit can be held at the proposed site for 90 days, increasing risk to area residents in the form of air, soil, and water pollution.
3. The Commonwealth of Kentucky does not need the power that would be generated by the proposed project. The state will be adversely affected by price hikes and blackouts from an excess of electricity. Kentucky's electricity rates are currently low; merchant power could make rates increase.
4. Very little has been said about the Red River, which is 1.5 miles from the proposed project. This river, part of which has been designated a National Wild and Scenic River, adds to the unique cultural and historical significance of Clark, Madison, and Estill counties where the three counties meet near the confluence of the Red River and the Kentucky River. This area is extremely close to the proposed project. This plant will wholly compromise the aesthetic quality of the Red and Kentucky Rivers, in an area where real Kentucky pioneers explored and settled the country.
5. According to the EIS, the gasifier facility stacks and plumes would likely be visible from the City of Winchester, the community of Trapp, and the Pilot Knob State Nature Preservation. What possible sense does it make for a county as scenic as Clark County, as well as the adjacent areas of Madison and Estill Counties, to be marred by stacks and plumes in generating power the Bluegrass State does not need?
6. The Kentucky River has been compromised for many years, an example being the nearby Boonesborough Beach, which has been closed to swimmers for many years.

Comment No. 1

Issue Code: 10

Comment noted. Impacts to traffic levels along Kentucky Highway 89 are addressed in Section 5.11 of the EIS, Traffic and Transportation. As stated, during construction, 500 to 1,000 vehicle trips would occur along Kentucky Highway 89 at the beginning and end of the construction workday. The exact number would depend on the staffing levels required onsite. Construction schedules typically call for workers to be onsite relatively early in the morning, thus avoiding morning schoolbus traffic, until the early afternoon. The Transportation Division of the Clark County School Board indicates that schoolbuses utilize Kentucky Highway 89 when construction workers would be leaving the site. Section 5.11, Traffic and Transportation, has been modified to reflect the impacts of the extra vehicles on schoolbus routes.

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The trucks would haul a maximum of 18 metric tons (20 tons) of cargo each, which would place the overall weight below the Kentucky-mandated maximum for Kentucky Highway 89 of 36,288 kilograms (80,000 pounds) for a five-axle vehicle. The Kentucky Transportation Cabinet indicated any vehicle below that weight traveling along that road would not be expected to cause damage to the roadway. Should damage occur from vehicles carrying more than the maximum weight allowance, the operator of the trucks, in this case KPE, would be responsible for any repairs to the road surface. Section 5.11, Traffic and Transportation, has been modified to address the concerns of damage to the local roads.

2/12

3/14

4/07

5/04

6/03

Comment No. 2

Issue Code: 12

Comment noted. Analysis of frit from gasification processes has shown that the frit is nonhazardous and rarely fails the TCLP for metals. Vitrified frit is expected to meet the more stringent Universal Treatment Standard criteria of the U.S. Environmental Protection Agency (EPA)-TCLP. There is no risk to residents from frit since all its constituents are immobilized in a glassy matrix which is resistant to corrosion in the environment and nonleachable by EPA standards. Vitrified frit is a commercial product and not a waste, therefore, it is expected to be marketable.

7/04

8/07

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Efforts to clean up the river are slow but constant. This proposed project is a step back in the environmental healing process of the river and will further compromise both the Kentucky and the Red rivers, since the Kentucky seasonally backs into the Red. Is it sensible to make a sick river sicker with a power plant that the state does not need? Kentuckians do want the Kentucky River to be environmentally sound and are working towards that goal.

7. Transporting over 4,000 tons of municipal waste from New York and New Jersey to Kentucky *daily* to generate merchant power is an unwieldy plan. Why can't the power plant be built in New York or New Jersey?

8. As a property owner near Trapp, I am extremely concerned about air, soil, and water pollution. The horrific results of the facilities in Paducah and Maxey Flats do not instill trust into this project, regardless of how much federal and state monitoring might take place. Don't put this risk in Trapp.

9. The community has not been informed as to the route the power transmission lines will take to Montgomery County. This is another unknown that will adversely affect the aesthetic and historical nature of the area. It is another aspect of this project that will unfairly blindside area residents later on.

10. The draft EIS does not come close to adequately addressing issues of culture, history, aesthetics. Trapp and much of Clark County, as well as most of neighboring Estill and Madison counties, are rural areas that heretofore have been largely saved from modern threats such as this one. Kentucky is a farming state, with a history of real pioneers in the area of the proposed plant. Putting the proposed plant at Trapp will change the lives of these people in too many negative ways. These people, with their history and culture were here before this plant; the plant should not be an interloper into this community and area.

Finally, I protest the manner in which the December 2001 public hearings were advertised and conducted, and the length of time between the meetings and the deadline for the written comments.

First, advertisement was too little and too few. Radio and television stations are required to carry a minimum number of public service announcements free of charge; there is no justification for electronic media not being informed by the U.S. Department of Energy about the public hearings. Advertisement in the Lexington, Louisville, and Winchester newspapers was not enough. This project is extremely close to the historic College Hill area of Madison County and close to Estill County. Extensive display advertisement, *not classified advertisement*, should have occurred in all of these counties, as well as other counties contiguous to Clark County. Residents of Clark County were given little notice; residents of several contiguous counties were given zero notice, even though issues of pollution and aesthetic compromises affect residents there as well. Could it be that the attitude of the U.S. Department of Energy and Global Energy, Inc. is that Kentuckians are

8/07
(cont.)

9/16

10/06,
11/05,
12/07

13/21

14/04,
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(cont.)

16/03
17/04

16/03
(cont.)

18/21

19/03

Comment No. 3

Issue Code: 14

Chapter 2 of the EIS discusses EKPC's 1998 Power Requirements Study. The study indicates that the electrical load for the region is expected to increase by 3.0 percent per year through 2017. Net winter peak demand is expected to increase by 3.3 percent per year and net summer peak demand is expected to increase by 3.0 percent per year. Peak demand is projected to increase from 2,031 megawatts (MW) in 1998 to 2,394 MW in 2003 and 3,478 MW in 2015. Based on this load growth, EKPC will need additional power supply resources of 625 MW in 2003. The need is further shown by EKPC's plans to construct four new combustion turbine (CT) electric generating units to provide peaking service alongside the three existing peaker CTs at the J.K. Smith Site.

Comment No. 4

Issue Code: 07

The proposed plant is located 2.4 kilometers (1.5 miles) downstream of the confluence of the Kentucky River and the Red River. The distance between the confluence of the rivers and the discharge point and the fact that the confluence is upstream make the chance of any discharges backing up into the Red River remote. Therefore, no impacts to the Red River would be expected.

Comment No. 5

Issue Code: 04

Comment noted. Due to the hilly terrain of the area and the distance of the Red River from the project site, the facility stacks from the gasification island would not be visible from the Red River.

Comment No. 6

Issue Code: 03

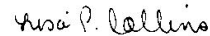
Concurrent with the EIS process and prior to committing federal funds or granting a license or permit for this undertaking, DOE is responsible for considering the impacts of its actions on cultural resources. Consultation with the Kentucky Heritage Council and State Historic Preservation Officer (SHPO) has determined that there is no effect on historic properties from this project.

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not bright enough to notice or care about the impact this project would have on their way of life?

Second, concerned citizens have been given from December 12 to January 4 to respond to the Draft EIS. This is an unreasonable length of time at any time of the year, but has been further compounded because this particular season is when students are finishing a school term and families are involved in significant holidays and the events that surround them. Who chose this unfair timeline at this time of the year? Again, was the thinking that Kentuckians would not notice or care? The manner in which the public hearings have taken place has done nothing to bolster confidence in this project.

Sincerely,



Lisa P. Collins
2344 Harrodsburg Rd.
Lexington, KY 40503

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Comment No. 6 (cont.)

Issue Code: 03

Chapters 4 and 5 have been revised to include the findings of the Section 106 Review process.

Comment No. 7

Issue Code: 04

Comment noted. Impacts to the aesthetic and scenic environment of the project area are presented in Section 5.5, Aesthetic and Scenic Resources, of the EIS. Because of DOE's limited role of providing cost-shared funding for the proposed Kentucky Pioneer IGCC Demonstration Project, alternative sites were not considered.

Comment No. 8

Issue Code: 07

Pollutant discharge limitations would be set by the Kentucky Natural Resources and Environmental Protection Cabinet, Division of Water's Water Resources Branch and would be identified in the KPDES permit. These limitations would be established based on site-specific computer modeling of the expected effect on water quality of the Kentucky River at the proposed discharge point and in the mixing zone immediately downgradient. The limits specified in the permit would protect existing water quality.

Comment No. 9

Issue Code: 16

Because of DOE's limited role of providing cost-shared funding for the proposed Kentucky Pioneer IGCC Demonstration Project, alternative sites were not considered. KPE selected the existing J.K. Smith Site because the costs would be much higher and the environmental impacts would likely be greater if an undisturbed area were chosen.

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Comment No. 10 **Issue Code: 06**
Comment noted. Hazardous waste clean-up activities at both the nuclear waste disposal site at Maxey Flats and the DOE gas diffusion plant at Paducah have no association with the proposed Kentucky Pioneer IGCC Demonstration Project. The activities and technologies used at the Maxey Flats and Paducah sites have nothing in common with the proposed Kentucky Pioneer IGCC Demonstration Project facility.

Comment No. 11 **Issue Code: 05**
All raw materials and wastes would be stored and handled in enclosed areas that would not be in direct contact with local soil. Therefore, no impacts to local soil quality would be expected from operation of the plant.

Comment No. 12 **Issue Code: 07**
Pollutant discharge limitations would be set by the Kentucky Natural Resources and Environmental Protection Cabinet, Division of Water's Water Resources Branch and would be identified in the KPDES permit. These limitations would be established based on site-specific computer modeling of the expected effect on water quality of the Kentucky River at the proposed discharge point and in the mixing zone immediately downgradient. The limits specified in the permit would protect existing water quality.

The primary issues with the facilities in Maxey Flats and Paducah involved historic releases of radioactive materials; there would be no radioactive materials associated with the proposed plant.

Comment No. 13 **Issue Code: 21**
Pursuant to Rural Utility Service (RUS) NEPA regulations, a NEPA document would be prepared that would address the impacts from the transmission line. Information in that NEPA document will be used to assure impacts are avoided and solutions integrated to avoid adverse public and environmental impacts.

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Comment No. 14 **Issue Code: 04**
Comment noted. All visual and aesthetic impacts from the transmission line will be addressed in a NEPA document that would be prepared according to RUS NEPA regulations. Information in the document will be used to assure impacts are avoided and solutions integrated to refrain from adverse public and environmental impacts.

Comment No. 15 **Issue Code: 03**
The transmission line would be constructed as part of both No Action Alternative 2 and the Proposed Action and would be subject to Section 106 Review as an undertaking, as defined by the *National Historic Preservation Act*. The route of the transmission line has not yet been determined and a cultural resource identification effort has not been defined. The cultural resource identification would likely include a pedestrian survey for archaeological resources and an assessment of the potential for visual impacts to the setting of any nearby cultural resources. Impacts to cultural resources from the transmission line will be evaluated in a NEPA document that will be prepared under RUS NEPA regulations.

Comment No. 16 **Issue Code: 03**
The EIS provides a summary of the cultural resource work that has been conducted on the proposed demonstration project site. Chapters 4 and 5 have been updated to show the findings of the completed Section 106 Review process. The Kentucky SHPO has found that there is no effect on historic properties from this project.

Comment No. 17 **Issue Code: 04**
Comment noted. DOE believes that the EIS adequately addresses all impacts to visual and aesthetic resources in the project vicinity. Impacts to the environment of the project area are presented in Section 5.5, Aesthetic and Scenic Resources, of the EIS.

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Comment No. 18

Issue Code: 21

The public hearing dates, times, and locations were announced in the *Federal Register*, in local newspapers, *The Winchester Sun* and *The Lexington Herald - Leader*, and in public service announcements. The comment period was extended through January 25, 2002. The Final EIS will be distributed to elected officials and any interested parties in neighboring counties. All requirements in state and federal laws, rules, and regulations regarding announcements for public hearings were satisfied or surpassed.

Comment No. 19

Issue Code: 03

The Section 106 Review process has been completed. The Kentucky SHPO has issued a finding of no effect on historic resources from this project.

Comment No. 20

Issue Code: 21

The comment period was extended through January 25, 2002.