

**Kentucky Natural Resources and Environmental Protection Cabinet, Division of Waste Management  
Frankfort, KY  
Page 1 of 1**

JAMES E. BICKFORD  
SECRETARY



PAUL E. PATTON  
GOVERNOR

COMMONWEALTH OF KENTUCKY  
**NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET**  
DEPARTMENT FOR ENVIRONMENTAL PROTECTION  
FRANKFORT OFFICE PARK  
14 REILLY RD  
FRANKFORT KY 40601

December 18, 2001  
Division of Waste Management  
Comments for Project #SER02001-101

Any hazardous waste generated must be handled according to the regulations. Global cannot presume the facility will be conditionally exempt until actual amounts of waste are generated.

Global needs to consider an on-site solid waste landfill in case the frit recycling market does not exist. In Waste Section – 500 to 700 tons per day would exceed small quantity limits if hazardous.

The Division of Waste Management would be concerned that all solid and/or hazardous waste generated by this project be disposed at a permitted facility.

Another concern is that during this type of project, old regulated and non-regulated underground storage tanks may be encountered, as well as other contamination. Should tanks or contamination be encountered they must be properly reported and remediated.

1/12

**Comment No. 1** **Issue Code: 12**  
Comment noted. KPE waste management activities will be in accordance with RCRA and applicable state regulations.

2/12

**Comment No. 2** **Issue Code: 12**  
Comment noted. Analysis of the frit from other gasification processes has found that it is nonhazardous and rarely fails the TCLP for metals. The frit generated by the proposed project is expected to pass the more stringent Universal Treatment Systems criteria of EPA-TCLP analytical method. If any of the frit could not be sold, it would be stored temporarily in covered rail cars and be disposed of at a licensed industrial solid waste landfill in the State of Kentucky, as discussed in Section 5.13, Waste Management.

3/12

**Comment No. 3** **Issue Code: 12**  
KPE waste management activities will be in accordance with RCRA and applicable state regulations. All waste generated onsite would be disposed of at licensed waste disposal facilities, as discussed in Section 5.13, Waste Management.

4/12

**Comment No. 4** **Issue Code: 12**  
As noted in Section 4.2, Land Use, the project area will consist of a 121-hectare (300-acre) tract of land previously distributed during site preparation for the abandoned construction of the J.K. Smith plant by EKPC. Therefore, because of this grading, KPE does not anticipate encountering any underground storage tanks or other contamination. In the event of encountering an unregulated storage tank or the occurrence of a reportable quantity spill, KPE would notify the KDEP and local emergency response units as well as the general public.

