Shoebrooks, Jeff and Robin Lexington, KY Page 5 of 10



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.

Page 5 0 10

Comment forms may be mailed to:

U.S. Department of Energy

National Energy Technology Laboratory 3610 Collins Ferry Road Morgantown, WV 26507-0880

Comment forms may be faxed to:

(304) 285-4403

Comment No. 6 Issue Code: 11

No impacts to health and safety of the general public would be expected from the operation of the proposed facility. Wastes generated at the plant would be managed in accordance with applicable state and federal regulations. Air and wastewater permits would limit these emissions to protect the public health and safety as well as the environment.

The gasification process would produce a small amount of wastewater containing primarily dissolved salts. Emissions would be primarily from the CT engines and cooling towers (see Table 5.7.3 of the EIS). Dispersion modeling conducted for the PSD/Title V Permit application covered an area about 12 kilometers (7.5 miles) from the project site, including the area of maximum air quality impact. Incremental ambient air quality impacts from the proposed project would be a very small fraction of the relevant federal and state ambient air quality standards (less than 1 percent for gaseous pollutants such as nitrogen dioxide, sulfur dioxide, and carbon monoxide and less than 4 percent of the federal 24-hour PM₁₀ standard). Total heavy metal deposition in areas downwind of the project would be much less than 1.1 kilogram per hectare (1 pound per acre) accumulated over 20 years.

Therefore, the overall increase in air emissions due to operation of the plant would be very low and present little risk to human health and the environment. Possible public health effects that could occur as a result of fire or a natural gas explosion would be minimized through basic facility design considerations.

5/06

(cont.)

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

(304) 285-4403

Comment No. 7 **Issue Code: 08** Based on the impacts analysis in the Draft EIS, Sections 5.7 through

9/16

8/22 (cont.)

10/16

5.9, and 5.12 and 5.13, potentially adverse impacts to wildlife would be minimized or avoided through the project design, implementation of various management plans, and compliance with permit conditions. By design, there would be no discharges into the groundwater and surface water discharges would be regulated by KPDES permit. Prior to surface discharge, pollutant loads on the river would be examined and discharge limits established to protect water quality. An SPCC plan would be in place prior to operation. This plan would set forth a series of response activities that would reduce or avoid potential impacts to groundwater and surface water during a spill event. The terms and conditions set forth in Air Quality Permit Number V-00-049 specify operational limitations and conditions, including monitoring and testing requirements that regulate the emission of air contaminants. The air permit is based on a high level of sulfur removal and recovery from the syngas stream prior to its use. The air permit application included an assessment of air toxics and a screening evaluation of risk from possible stack emission constituents. The Kentucky Department of Air Quality determined that this risk was insignificant and that no further evaluation was required. While this evaluation is specific to human health concerns, it is an additional indicator for a low probability of adverse impacts to wildlife. Additionally, a component of the air quality permit includes a Phase II Acid Rain Permit. Adherence with permit conditions would limit air pollutant emissions in the local area and reduce the likelihood of adverse impacts to both plants and animals. Prior to plant operation, the effluent temperature of discharges into the Kentucky River would also be established and regulated to minimize impacts to the aquatic organisms.

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VIS. Department of Energy
National Energy Technology Laboratory
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Morgantown, WV 26507-0880

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Comment No. 8

Issue Code: 22

Comment noted. The benefits associated with the proposed project are increased tax revenues for the State of Kentucky and additional jobs.

Comment No. 9 Issue Code: 16

The purpose of this EIS is to evaluate public and environmental impacts caused by the proposed project. DOE will consider the information provided in the EIS and public comments in this decision process. Chapter 2 discusses EKPC's 1998 Power Requirements Study which 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 expected to increase from 2,031 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 CT electric generating units to provide peaking service alongside their three existing peaker CTs at the J.K. Smith Site. The power generated by the project will be used to support Kentucky's energy needs. Because of DOE's limited role of providing cost-shared funding for the proposed Kentucky Pioneer IGCC Demonstration Project, alternative sites were not considered.

(cont.)

8/22

1/16 (cont.)

Comment No. 10

Issue Code: 16

The relatively small amounts and generally widely 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.

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House Wren (4-25) Golden-crowned Kinglet

Ruby-crewned Kinglet

Wildlife of 366 Old Ruckerville Road Pege 8 2 10

Blue-gray Gnatcatcher (4-27) (4-23) (nest) Eastern Bluebird BIRDS (= at feeders) 92 species Great Blue Heron American Robin (nest) Green Heron (4-22) (4-17) Gray Catbird Turkey Vulture Northern Mockingbird Black Vulture (5-21) Brown Thrasher Canada Goose European Starting (nest) Wood Duck Cedar Waxwing Osprey (5-21) Red-eyed Vireo (5-10) Sharp-shinned Hawk White-eyed Vireo (4-25 Red-tailed Hawk Tennessee Warbler American Kestrel Wild Turkey Black-throated Green Warbler Northern Bobwhite Magnolia Warbler Killdeer Black-and-white Warbler (4-27) Solitary Sandpiper (4-23) American Woodcock (2-25) Palm Warbler (4-29) (5-3) Prairie Warbler (4-25) (5-3) Yellow Warbier (5-10) (5-3) Great Horned Owl Blackpoll Warbler (5-10) Eastern Screech-Owl Morning Warbler (10-4) Yellow-billed Cuckoo (5-29)(5-6) Common Yellowthroat (4-27) (4-23) Black-billed Cuckoo (5-20) Yellow-breasted Chat (5-7) (5-1) Common Nighthawk (5-5) Chimney Swift (4-30) (4-27) Ruby-throated Hummingbird (4-27) (nest) Belted Kingfisher Field Sparrow (4-2-00) Savannah Sparrow Red-headed Woodpecker Hairy Woodpecker Northern Flicker Pileated Woodpecker Eastern Wood-Pewee (5-17) Eastern Phoebe (3-27)(3-4-00) Eastern Kingbird (4-30) (5-2) Great Crested Flycatcher (5-22) Baltimore Oriole (5-2) (nest) (5-3) Tree Swallow (4-5)(4-6) Northern Rough-winged Swallow (4-23) Orchard Oriole (5-9) Eastern Meadowlark Barn Swallow (4-25) Common Grackle Blue Tay (nest,00) Brown-hasted Covers American Crow House Finch American Goldfisch Carolina Chickades Tuffpd Turneuse White-breasted Philippuh Blue Crosbeak Indigo Bunting (5-2) Carolina Wren (nest 99,00) Rose breasted Chosbeak

House Sparrow

2/08 (cont.)