



Response to Comments

**Project: Ohio River Clean Fuels, National Pollutant Discharge Elimination System (NPDES) Permit
Ohio EPA ID #: 3IG0097**

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Ohio EPA held a public hearing on May 27, 2008, regarding Ohio River Clean Fuels' (ORCF) coal-to-liquid-fuel facility. This document summarizes the comments and questions received at the public hearing and/or during the associated comment period, which ended on June 3, 2008.

Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format.

Comments on Ohio EPA Procedures

Comment: 1: The antidegradation analysis is incomplete and not approvable as submitted. Under Ohio EPA antidegradation rules, the applicant's submittal must include the following procedural and substantive standards before determining that the lowering of water quality is justified:

- Examination of alternatives;
- Review of the social and economic issues related to the activity;
- Public participation; and
- Appropriate intergovernmental coordination.

Also, the Ohio Antidegradation Addendum calls for a brief description of all treatment/disposal alternatives evaluated for the application and their respective operational and maintenance needs.

The antidegradation analysis provided by ORCF focuses almost exclusively on review of alternative sites, their impacts and site-specific project feasibility considerations. This submittal is non-responsive to the information required by the Antidegradation Rule and the application addendum line-items.

The applicant's antidegradation submittal is unacceptable and not approvable because the submittal fails to identify alternate technologies and mitigation techniques specific to treatment-technology effluent limitations, controls and wastewater treatment. The only alternative identified is the selected alternative. Also, the applicant's antidegradation analysis depends on a report that is not in the public record and has not been disclosed to NRDC (the "Front-End Engineering and Design (FEED) Report).

In addition, the applicant admits that the High Efficiency Reverse Osmosis treatment system has not been demonstrated for this industrial wastewater and other controls may be necessary. It is also not clear whether the coal pile runoff discharge will be treated at this unit or discharged directly to a stream. Such uncertainty is not an element of an approvable antidegradation demonstration.

Finally, we note that the record contains no information that the Ohio Department of Natural Resources, the U.S. Fish and Wildlife Service, the U.S. Environmental Protection Agency or any affected area-wide planning agencies were given notice of the proposed lowering of water quality as required by rule.

For these and other reasons stated in our comments, NRDC and Sierra Club request that Ohio EPA withdraw the draft NPDES permit, correct the deficiencies and re-issue it for public comment accompanied by all required findings and information.

Response 1: The Ohio River Clean Fuels NPDES permit application was received by Ohio EPA in December 2007 (modified February 8, 2008). Receipt of application and solicitation for comments from the public was public noticed in the newspaper on March 12, 2008. The application materials along with a fact sheet were posted on Ohio EPA's Web site. We did not receive comments from the public on the receipt of the application.

Ohio EPA issued the draft permit for this facility on April 11, 2008, along with a public notice that Ohio EPA would hold a public hearing. Ohio EPA's antidegradation rule provides for the option of combining a hearing on the draft permit with the antidegradation hearing. In addition, Ohio EPA issued a news release and citizen advisory announcing the draft permit and public hearing two weeks prior to the meeting. This hearing was held on May 27, 2008. Several people testified at this hearing.

As set forth in the fact sheet on the draft permit, the public was invited to submit additional comments for consideration prior to the agency's action on the final permit. Ohio EPA provided public notice to Ohio Department of Natural Resources (ODNR), U.S. Fish and Wildlife Service (FWS), U.S. EPA, the West Virginia Department of Environmental Protection and the Ohio River Water Sanitation Commission (ORSANCO). This is part of Ohio EPA's standard practice. There is no local planning agency in this part of Ohio that oversees wastewater.

As set forth in more detail in Ohio EPA's response to comment #3, considering social and economic justification (SEJ) as a part of the antidegradation process is done in conjunction with review of public input and comments from government stakeholders prior to a final decision on the permit.

With respect to the treatment alternatives that were submitted, the following alternatives were evaluated during the process; 100% Recycle, Evaporation Basins, Brine Concentrators, Crystallizers, Membrane Processes and Deep Well Injection. These alternatives were not selected because the projected operational costs are prohibitive or physically impossible to accomplish. There is no regional sewage facility capable of accepting the flow from this facility. The preferred alternative utilizes best available

design technology for treatment, recycling as much water as possible and minimizing disturbance of streams and wetlands on site.

The coal pile runoff treatment system may be further treated by reverse osmosis (RO) or discharged directly from the coal pile treatment system; some combination of these alternatives may also occur due to flow capacity limitations of the RO systems. In either case the treatment provided meets the definition of Best Available Demonstrated Control Technology in Ohio's Antidegradation Rule.

Comment 2: **NRDC requested a two-week extension to the comment period, due to problems related to Ohio EPA's copier. It is not fair to the public not to allow time to review all the very complicated materials.**

Response 2: Ohio EPA Director Chris Korleski reviewed this request and denied the request for an extension to the comment period in a letter to NRDC on May 29, 2008. Because the receipt of application was public noticed in March 2008, the Agency feels there was adequate time for the public to review the application and draft permit. The comment period ended June 3, 2008.

Comment 3: **The NPDES fact sheet for ORCF does not include tentative findings of fact and conclusions of law related to the antidegradation demonstration. This denies those who wish to comment on the information necessary time to review and comment on the draft permit.**

Federal regulations in 40 CFR 124.8 state that the fact sheet should set forth significant factual and methodological questions in preparing the draft permit. While the public notice aspects of the antidegradation decision have been covered in a separate notice, antidegradation remains a significant component of this permit action. The basis of Ohio EPA's antidegradation decisions should be described in the NPDES fact sheet.

Response 3: Ohio EPA takes comment #3 to mean that there is no express finding regarding how the Agency considers the social and economic factors as part of the antidegradation process. While fact sheets, including this one, contain the technical justifications and methodologies for drafting terms

and conditions of the permit, Ohio EPA routinely does not include an in-depth discussion of the social and economic justification (SEJ) analysis as part of its fact sheet, nor has U.S. EPA historically commented on this issue.

Consideration of social and economic justification and the public comments that are a part of the antidegradation review are conducted as a part of the final decision on whether or not to issue a permit.

In this case, staff made a recommendation on these factors that were considered, along with the public comment, as a part of the final permit issuance. A copy of the staff recommendations follows the Response to Comments.

Monitoring Concerns and Discharge Limits

Comment 4: **The failure of the applicant to submit an Ohio Permit-to-Install during the NPDES review period is prejudicial to a proper Ohio EPA review on treatment technology-based limitations and the public's ability to comment on such a determination.**

No detailed piping and schematic drawings exist for important wastewater units, such as the dual reverse osmosis, evaporation/crystallization units and a high efficiency reverse osmosis (RO) unit that would allow reviewers to validate applicant's claims of "zero discharge" on syngas quench and cleanup wastewater treatment units.

The failure to submit information on these treatment units means that there is not a sufficient basis for setting treatment technology-based effluent limitations.

Response 4: A general description of the treatment process is sufficient to develop treatment technology-based standards. The application must convey the information necessary for Ohio EPA to draft a permit that is protective of human health and the environment. The applicant provided sufficient information that a permit could be drafted which meets all applicable regulations. The permit-to-install will be used to ensure the appropriate treatment technology will be employed to comply with the NPDES permit limits.

There are significant similarities between the processes proposed by ORCF and other processes that have best

available demonstrated control technology (BADCT) treatment. For example, processes entering the plant are likely to be similar to petroleum refining and to organic chemical, plastics and synthetic fibers categorical wastewaters. Therefore the limits achieved for those treatment systems can be used as BADCT for this treatment system. Similar comparisons can be made for the processes similar to those at steam electric power plants.

Comment 5: **The applicant admits that use of the planned feedstock will mean a predicted mercury process input flux of 1,860 pounds/year. Mercury will leave the syngas process area in potentially three streams – incorporated into slag and slag quench water, as a gaseous syngas component and dissolved in syngas process wastewater.**

The treatment system description is unclear as to whether there will be a discharge of mercury from the syngas process area. If the ORCF will be a zero mercury discharge facility and Best Professional Judgment (BPJ) of Best Available Technology (BAT) supports a zero discharge requirement, the permit must contain a zero discharge limitation.

The treatment system, which appears to consist of carbon beds and the dual RO process, may discharge to the process wastewater settling basin. If true, this process of developing limits is both backward, and the application must be considered incomplete as to proposed BPJ/BAT determination for mercury effluents (and potentially other toxic metals contained in syngas process water).

Response 5: While mercury discharges from plant processes are expected be low, the permit does not envision zero discharge of mercury, as noted by the Outfall 001 effluent limit. The limit of 12 ng/l is protective of water quality standards and ORSANCO standards. At this point, Ohio EPA does not have sufficient information on treating mercury through these systems to establish treatment technology-based limits at the internal monitoring stations; therefore, the water quality limit at the end of pipe is appropriate.

Comment 6: **Page 25 of the fact sheet explains that according to the permit writer's best professional judgment, total cyanide**

limits of 1.2 mg/l maximum and 0.45 mg/l 30-day average should be imposed at Outfall 605. The draft permit includes limitations for free cyanide at Outfall 605, however, this outfall does not include limitations for total cyanide. The final permit should include BPJ limitations for total cyanide at Outfall 605 as described in the fact sheet.

Response 6: We have changed the final permit so that the cyanide limitations at Outfall 605 are expressed as total cyanide.

Comment 7: **The draft permit does not identify the required technical methods, quantification levels and minimum levels for wastewater analysis for most chemical pollutants discharged under the permit.**

Conditions K, L and M identify the required wastewater analytical methods for total residual chlorine and free cyanide. However, methods and quantification levels for other methods are not included. The draft permit should be amended to include a table showing all of the required analytical methods and required accuracy to be achieved for each and every chemical constituent for which effluent limitations exist in the draft permit.

Response 7: Part III 5 of the permit indicates that all analyses must conform to 40 CFR 136 test methods and specifies calibration and other quality assurance tasks that need to be followed. For most pollutants, this is sufficient to ensure the necessary sensitivity. Ohio EPA includes specific conditions in Part II of the permit only when a certain level of sensitivity is necessary to quantify a limit (e.g., mercury), when no approved method can quantify a limit (chlorine), or when no analytical method is approved under 40 CFR 136 (free cyanide).

Based on your comment, we have added a Part II condition that requires the use of U.S. EPA Method 1631 or 245.7 for mercury. Only these two methods are capable of quantifying mercury at the final effluent limit.

Comment 8: **The final effluent limit for mercury is not clear. The permit sets a 30-day average limit of 12 ng/l and a maximum limit of 1700 ng/l, with associated loading limits. The monitoring frequency is once a month.**

What is not clear is whether the single monthly monitoring result is evaluated against the average limit or the maximum limit. The monthly limit should not be evaluated on an annual compliance basis.

Response 8: The monthly sample result is evaluated against both limitations. If the permittee exceeds the average limit in that sample, they have the option of collecting additional samples during that month to maintain compliance with the average limit. We believe that this is clear from the permit language.

Comment 9: **We recommend that flow monitoring be added for Outfall 604. As the fact sheet states, monitoring of flow at this outfall will assist in the evaluation of effluent quality and treatment plant performance.**

Response 9: We have corrected this in the permit.

Comment 10: **There are no monitoring requirements for chronic toxicity of the Outfall 001 effluent, which might be reasonably expected to be present in the effluent of such a facility.**

Response 10: We agree that chronic toxicity is likely to be present; however, given the respective wasteload allocations for acute and chronic toxicity (1.0 TUa and 40 TUc), we believe that acute toxicity will be the more limiting factor for this effluent.

Ratios of chronic to acute toxicity are very rarely greater than 18-20, as noted in the Great Lakes Water Quality Guidance, which includes a default chronic:acute ratio of 18:1 in its water quality criteria development procedures (incorporated into Ohio WQS at OAC 3745-1-36). Based on this information and the ORCF wasteload allocation for toxicity, we believe that it makes more sense for the effluent to be tested for acute, rather than chronic toxicity.

Comment 11: **While Outfall 001 has a requirement for once per day temperature monitoring, there is no review as to whether the discharge of 9.7 MGD of wastewater at 100°F as shown in the application will affect compliance with Ohio water quality standards for temperature at the edges of the mixing zone. A facility that discharges cooling tower and boiler blowdown should have an NPDES permit that contains temperature limitations.**

In addition, continuous temperature monitoring is considered state-of-the-art and should be incorporated into the permit at all points where a temperature is limited or monitored.

Response 11: Based on Ohio EPA's review of flows, effluent temperatures and ORSANCO water quality standards, there is no reasonable potential for thermal loads from this facility to contribute to exceedances of water quality standards; therefore temperature limits are not needed.

While effluent temperatures may be as high as 100°F, the 001 effluent volume is only 1.6% of the Ohio River 7Q10 flow, or low flow levels. Even with Ohio's standard mixing assumptions, there is no reasonable potential for this relatively small effluent volume/load to contribute to exceedances of water quality standards.

Comment 12: **The applicant admits that the facility will discharge over 16 tons of total dissolved solids per day, but the draft permit contains no technology-based limits for this parameter. Ohio EPA's water quality standard appears excessively high at 45,326 mg/l for aquatic life criteria with no inside mixing zone maximum at all.**

Response 12: Limits are not being required for total dissolved solids (TDS) because acute toxicity limits cover this. First, there is no maximum water quality standard for TDS, due to differences in the toxicity of different ionic mixtures. The limit on acute toxicity was included to limit toxicity due to TDS, as well as regulate any mixture of pollutants that might be toxic.

Treatment technology-based limits were not included because TDS is not treatable in medium-to-large volume effluents. In small effluents, some of the TDS can be treated, as in the evaporation processes proposed by ORCF. In larger effluents, the energy requirements and costs are too high to make evaporation practical.

Comment 13: **Chloride is likely to be present in process water because of chlorides contained in coal. However, there are no testing requirements or effluent limits for chlorides.**

Response 13: We agree that chloride is likely to be present; however, chlorides are considered part of total dissolved solids. The

evaluation of TDS standards and limits and the acute toxicity limit will control chloride discharges.

Comment 14: **Reduce the monitoring frequencies of parameters at Stations 001 and 601: After review of similar refining type operations, Ohio EPA has been consistent with the monitoring frequencies required at stations 001 and 601.**

Response 14: Conventional parameters are typically twice per week or more. Ohio EPA is willing to reduce sampling required for metals with limits to once per week and metals without limits to monthly. As stated in previous correspondence, this is a unique facility without much data, so monitoring will be extensive in the first permit. After the facility reaches full production and some historical data is available, Ohio EPA could entertain a reduction in sampling frequencies at that time.

Comment 15: **ORCF requests that the monitoring frequency for acute toxicity at Outfall 001 be reduced from bimonthly to once per quarter. Quarterly testing is a typical frequency for NPDES permits. Most of the new permits are doing bio-monitoring bi-monthly.**

Response 15: Ohio EPA has been requiring bi-monthly testing for new major industrial facilities. This level of testing is needed to gauge the toxicity of a new discharge, especially when there is no maximum TDS limit. Again, with this being a new facility some historical data is warranted prior to changing. The language on page 26 will be corrected to correspond to the table on page 3.

Intake Structure Concerns

Comment 16: **If the facility utilizes a cooling water intake structure on the Ohio River or obtains cooling water from a surface intake structure from a third party other than a public water supply, the permit must identify ORCF as a new facility with a cooling water intake structure subject to the requirements of the Phase I 316(b) regulations in 40 CFR Part 125. The permit/fact sheet should also identify whether the facility has made a Track I or Track II demonstration as defined in 40 CFR 125.86. The permit should also identify the proposed location of the cooling water intake and proposed flow rates for that intake.**

The permit must include Ohio EPA's Best Technology Available (BTA) determination and identify the technologies and performance standards that the facility will be required to meet to comply with the 316(b) rule.

Response 16:

The permit has been revised to include 316(b) conditions. The plant would withdraw primarily raw water from Buckeye Water that would take up most of the intake capacity. The Phase I 316(b) regulations require that the cooling water user document compliance with intake structure rules, even if they purchase water from another source.

Because this system will be a closed-cycle system and will be required to meet the intake velocity requirement of 0.5 feet/second as specified in the rule, no significant harm is expected due to impingement and entrainment of organisms. In addition, the design intake flow is less than 5% of the mean annual flow of the Ohio River, which is another requirement for Track I facilities. Ohio EPA believes that further measures to reduce impingement and entrainment are not necessary, since we are not aware of any threatened or endangered species, or species of concern that could be affected by this intake.

Because this intake would meet these federal design standards, the Phase I 316(b) rule does not require such systems to provide estimates of impingement and entrainment prior to construction. Data collection is required after the intake is constructed and operating to verify compliance with design standards.

Based on these comments, Ohio EPA has added Part II S. to indicate the applicability of the Phase I rule, more clearly define the design standards and find that they meet BTA. The language also identifies the location of the intake and cites the design flow.

Comment 17:

If the facility is covered by the Phase I 316(b) rule, information must be provided by the permittee. ORCF must submit baseline biological data and monitoring data required by 40 CFR 125.87 and 125.88. This rule requires monitoring for impingement (organisms becoming trapped on screening material), entrainment (organisms being pulled through pipes/equipment), velocity at intake and visual inspection of the intake. The Source Water Baseline Biological Characterization

Study or Comprehensive Demonstration Study is to be used in identifying species of concern, the monitoring methods to be used and the timing of entrainment sampling.

Ohio EPA must add permit conditions implementing these requirements if they are applicable.

Response 17: These requirements have been added to Part II of the permit.

Comments Related to Special Permit Conditions (Part II of the permit)

Comment 18: Part II, H. states, “There shall be no detectable amount of any priority pollutant....” We recommend that the permit define “priority pollutant” as identified in Section 307 of the Clean Water Act.

Response 18: We have made this change to Part II, H.

Comment 19: The application contains no information about cooling tower and boiler additives.

Response 19: ORCF has indicated that they will use chlorine as a biocide in the cooling tower. The permit contains limits and other conditions for chlorine to ensure that both water quality and treatment technology standards are met.

For other chemical additives, the permit contains a condition that requires all of these additives to meet water quality standards and be approved by Ohio EPA (Part II, D.). If the facility intends to use another chemical additive it must notify the Ohio EPA and obtain approval prior to using it.

Comment 20: Condition II C. of the draft permit is objectionable since it attempts to exclude ORCF from monitoring requirements on weekends and holidays. There is no basis in law for claiming that weekends and holidays should be exempt from monitoring requirements. Even if this provision is included in a final permit, there is no basis for excluding any permit limitation and monitoring practice done with automatic continuous monitoring. As drafted, the permit would exclude continuous monitoring for temperature and pH from weekend/holiday monitoring and data retention.

Response 20: While this paragraph does not exempt dischargers from compliance with limits, we agree to remove this paragraph. For the parameters that have daily monitoring, this information can be recorded and reported.

Comment 21: **Oil and Grease Language, Part II, E.: ORCF has asked this language be removed since it is listed in Outfall 002 monitoring requirements. This language describes how the sampling must be accomplished and default sampling requirements in the event of no measurable rainfall.**

Response 21: This is standard language for all storm water outfalls in industrial permits. The permit language remains as drafted.

Comments on Generic Permit Requirements (Part III)

Comment 22: **The draft permit does not contain all permit condition elements required under federal regulations binding on Ohio's authorized NPDES program. Federal regulations at 40 CFR 122.41 and 122.42 require that all NPDES permits contain certain permit conditions. These requirements are binding on Ohio's issuance of NPDES permits under its program. These conditions are not included in the draft permit.**

Response 22: The conditions of 40 CFR 122.41 and 122.42 are included in Part III of the permit. All Ohio NPDES permits contain these conditions.

Comments Related to Pollution Management Activities

Comment 23: **The applicant's plans for storm water control and the site raw material storage do not address all of the effluent potential for outdoor storage of chicken house litter wastes. Outdoor storage of such wastes (or sewage sludge if used as biomass) must be considered as a material handling storm water source of phosphorus, ammonia, pathogens and BOD, both from storage pile leachate and fugitive dust transport. The application does not address these issues. Similar issues relate to the storage of wood chips.**

Response 23: The applicant has indicated the biomass will be stored under roof and should not enter the storm water ponds.

Furthermore, the company has stated that chicken waste will no longer be used as a potential source.

Comment 24: **ORCF is planning to use glycol “freeze protection” solutions for equipment process use. There is no discussion in the application on the storage, treatment and discharge of glycol wastewater.**

Response 24: The glycol is part of a closed circuit cooling water system for cooling rotating equipment. Heat is removed from the glycol systems by the open water recirculation system. The systems will be designed to keep all the glycol in the cooling loop and remove the accumulated heat from the glycol by cooling water via heat exchangers that will keep the glycol and water separated (the glycol system is similar to an automobile radiator).

Comment 25: **There is no information on effluent control parameter monitoring to ensure that failures of reverse osmosis (RO) systems are detected as a best management practice measure.**

Response 25: The RO units will be designed with appropriate alarms and back-up systems to keep these operations online and functioning under the appropriate regulatory parameters. The specific requirements will be included in the permit-to-install.

Comment 26: **Information available on the Wabash IGCC power plant indicates that dredging of settling basins at a similar installation with similar processes creates very large effluent limit violations for metals and cyanide. There is no BMP or effluent control information contained in the application or draft permit that addresses how effluents created by maintenance dredging of both the settling basin and the biological wastewater control unit will be prevented from causing excessive effluent releases.**

Response 26: The design, maintenance and cleaning of the settling basin will be addressed in the permit-to-install.

Comment 27: **If a crystallization system is ultimately used at the site, it will generate a waste stream for offsite disposal of considerable hazardous potential as it will be sludge at 35% solids content containing solids that are highly soluble in water. It will contain not only mercury, but**

several other toxic metals evolved with uncleaned syngas. Neither the application nor the draft permit contains any information at all on how this solid waste will be handled and stored to avoid pollution from such solid waste management.

Response 27: Residuals from the crystallizers will be analyzed and managed for appropriate disposal and/or reuses based on the TCLP results.

Comment 28: **I have not seen anywhere a proposal for what the company is going to do with coal ash; normally ash is cooled with water and taken to a collection pond. This ash wastewater contains mercury and all the other poisons that are in coal.**

Response 28: The ash will essentially be dry although it will have some moisture content and will be pneumatically conveyed from the gasifiers directly into onsite silos for storage. The ash will then be pneumatically loaded into trucks for offsite disposal at a permitted facility. The ash will be in a totally enclosed environment during transport through disposal.

Design documents indicate that the ash produced by the gasification process will be <5% carbon with the balance containing minerals similar to coal combustion ash. Bulk density is given as 19 to 44 lb/ft³. The levels of metals in the ash are not expected to be at concentrations which would result in leachable levels in excess of the TCLP levels for toxicity. The gasification ash is not expected to be a hazardous waste. The gasification ash has sales potential into the cement and aggregate industries; other beneficial uses for gasification ash are being evaluated. The gasification ash can be sent to appropriately regulated facilities, such as a landfill.

Comment 29: **How will EPA regulate the coal transfer from barges and trucks to the facility?**

Response 29: The air permit application states the coal deliveries will be by barge and/or railcar and truck. Conveyors will transfer feedstock onto ORCF property. All conveyors will be enclosed to minimize dust.

Other General Comments

Comment 30: This project is important for Columbiana County and surrounding areas. It is important to provide stable, high-quality jobs for our children. This plant would provide 1,200-1,500 area jobs, including 400 at the plant itself, with minimal risk to the environment. The plant would monitor seven locations within the plant, as well as the final effluent. The permit represents a new frontier with EPA using best professional judgment based on similar industries.

The project is also important for national defense. The fuels produced may be put to use in military aircraft. This would reduce dependence on foreign oil.

Response 30: Ohio EPA acknowledges this comment.

Comment 31: This project has several flaws. It may not be economical to build and run because of rising coal prices; also, natural gas prices are rising and the plant seems to depend on natural gas as the main energy source. This may not decrease dependence on foreign energy sources; the United States is importing increasing amounts of coal from many of the same countries that we import oil from.

There is also no guarantee that jobs will go to local citizens or that local citizens will have the skills needed to work in the plant.

Please note that a former head of the CIA has come out explicitly against coal-based fuels because of the national security concerns with climate change.

Response 31: Ohio EPA acknowledges this comment but has no authority in the matters it addresses.

Comment 32: Carbon sequestration is a very expensive technology. Similar plants in Pennsylvania have essentially written off this technology because of the cost. Also, because of the high probability of leaks, this technology is likely to be ineffective at capturing carbon dioxide, and may be dangerous. Many people were killed in an African village, when CO₂ escaped from a natural seep.

Also, mercury emissions from the facility are unacceptably high. The proposed emissions may impact human health and accumulate in fish tissue.

Response 32: These comments are related to air permit issues. Ohio EPA has scheduled a public meeting on the draft air permit ORCF on September 10, 2008. The information session and public hearing will begin at 6:30 p.m. at Wellsville High School, 1 Bengal Avenue, Wellsville.

End of Response to Comments