



**FUTUREGEN PROJECT  
FINAL  
ENVIRONMENTAL IMPACT STATEMENT**

**DOE/EIS-0394**

**Volume I  
Chapters 1-3, 8-12  
Appendices**



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# COVER SHEET

**Responsible Agency:** U.S. Department of Energy

**Title:** Final Environmental Impact Statement for FutureGen Project (DOE/EIS-0394)

**Location:** Mattoon, Illinois; Tuscola, Illinois; Jewett, Texas; and Odessa, Texas

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**Abstract:**

The Final Environmental Impact Statement (EIS) for the FutureGen Project provides information about the potential environmental impacts of the U.S. Department of Energy's (DOE's) proposal to provide federal funding to the FutureGen Alliance, Inc. (Alliance) for the FutureGen Project. In a March 2004 Report to Congress, DOE estimated the cost of the project at \$950 million in constant 2004 dollars shared at a 74/26 ratio by DOE and the Alliance. Accounting for escalation, based on representative industry indices, the project is currently estimated to cost **\$1.757 billion** in as-spent dollars. The cost estimate will be updated as work progresses.

The Alliance is a non-profit industrial consortium led by the coal-fueled electric power industry and the coal production industry. The FutureGen Project would include the planning, design, construction, and operation by the Alliance of a coal-fueled electric power and hydrogen gas production plant integrated with carbon dioxide (CO<sub>2</sub>) capture and geologic sequestration of the captured gas. The FutureGen Project would employ integrated gasification combined cycle power plant technology that for the first time would be integrated with CO<sub>2</sub> capture and geologic sequestration. Four sites have been identified as reasonable alternatives and are considered in this EIS: (1) Mattoon, Illinois; (2) Tuscola, Illinois; (3) Jewett, Texas; and (4) Odessa, Texas.

DOE determined that the proposed FutureGen Project constitutes a major federal action within the meaning of the National Environmental Policy Act. The *Federal Register* "Notice of Intent to Prepare an Environmental Impact Statement for FutureGen Project" was published on July 28, 2006 (71 FR 42840). DOE held public scoping meetings at Mattoon, Illinois, on August 31, 2006; Tuscola, Illinois, on August 29, 2006; Fairfield, Texas (near Jewett), on August 22, 2006; and Midland, Texas (near Odessa), on August 24, 2006.

The Final EIS provides an evaluation of the environmental consequences that may result from the Proposed Action at each of the four candidate sites, including potential impacts on air quality; climate and meteorology; geology; physiography and soils; groundwater; surface water; wetlands and floodplains; biological resources; cultural resources; land use; aesthetics; transportation and traffic; noise and vibration; utility systems; materials and waste management; human health, safety, and accidents; community services; socioeconomics; and environmental justice. The Final EIS also provides an analysis of the No-Action Alternative, under which DOE would not provide financial assistance to the FutureGen

Project. *The preferred alternative, to provide financial assistance to the FutureGen Project, is identified in the Final EIS.*

***Public Participation:***

*DOE encourages public participation in the NEPA process. Comments were invited on the Draft EIS for a period of 45 days after publication of the Notice of Availability in the Federal Register on June 1, 2007. DOE considered all comments to the extent practicable. DOE conducted four public hearings to receive comments on the Draft EIS in June 2007 in Midland (Odessa), Texas; Buffalo (Jewett), Texas; Mattoon, Illinois; and Tuscola, Illinois. The public was encouraged to provide oral comments at the hearings and to submit written comments to DOE by the close of the comment period on July 16, 2007.*

***Changes from the Draft EIS:***

*Vertical lines in the left margin of a page indicate where text in the Draft EIS has been deleted, revised, or supplemented for this Final EIS, except for Volume III, which contains the public comments on the Draft EIS and DOE's responses. Additionally, revised and supplemental text in the Summary and Volumes I and II are shown in boldface italics font (as in this paragraph). Sections that include revisions are also identified in the Table of Contents.*

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## LIST OF ACRONYMS

<b>Acronym</b>	<b>Definition</b>
2000 HCM	2000 Highway Capacity Manual
2D	two-dimensional
3D	three-dimensional
AASHTO	American Association of State Highway and Transportation Officials
ACAA	American Coal Ash Association
ACHP	Advisory Council on Historic Preservation
ADT	Average Daily Traffic
AEGL	Airborne exposure guideline level
AGR	acid gas removal
AMSL	above mean sea level
ANOI	Advance Notice of Intent
APE	area of potential effects
AQCR	Air Quality Control Region
AQRV	air quality related values
ASU	air separation unit
BAFO	Best and Final Offer
BEG	Bureau of Economic Geology
BLM	Bureau of Land Management
BMP	best management practice
Btu	British thermal unit
CAA	Clean Air Act
CAMR	Clean Air Mercury Rule
CCN	Certificate of Convenience and Necessity
CCPI	Clean Coal Power Initiative

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<b>Acronym</b>	<b>Definition</b>
CCWIS	Crane County Water Injection System
CEED	Center for Energy and Economic Diversification
CEMS	Continuous Emissions Monitoring System
CEQ	Council on Environmental Quality
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CERCLIS	Comprehensive Environmental Response, Compensation and Liability Information System
CFR	Code of Federal Regulations
CH	County Highway
CHSP	Comprehensive Highway Safety Plan
COPCS	chemicals of potential concern
CR	County Road
CRMWD	Colorado River Municipal Water District
CRP	Conservation Reserve Program
CSMS	conceptual site models
CWA	Clean Water Act
dB	decibels
dBA	A-weighted sound measurements
DoD	Department of Defense
DOE	U.S. Department of Energy
DOT	U.S. Department of Transportation
ECBM	enhanced coalbed methane
EGR	enhanced gas recovery
eGRID	Emissions Generation Resource Integrated Database
EIA	Energy Information Administration
EIS	Environmental Impact Statement

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<b>Acronym</b>	<b>Definition</b>
EIV	Environmental Information Volume
EMF	electromagnetic fields
EO	Executive Order
EOR	enhanced oil recovery
EPA	U.S. Environmental Protection Agency
ERCOT	Electric Reliability Council of Texas
ESAs	Environmental Site Assessments
FAA	Federal Aviation Administration
FE	Fossil Energy
FEMA	Federal Emergency Management Agency
FG	FutureGen
FHWA	Federal Highway Administration
FM	Farm-to-Market Road
FPPA	Farmland Protection Policy Act
FRA	Federal Railroad Administration
FTA	Federal Transit Administration
FWS	Fish and Wildlife Service
GAM	groundwater availability model
GHG	greenhouse gas
GIS	Geographic Information System
GLO	General Land Office
GPM	gallons per minute
GWh	gigawatt hours
HAARGIS	Historic Architectural and Archeology Resources Geographic Information System
HAP	hazardous air pollutant
HCS+	Highway Capacity Plus

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<b>Acronym</b>	<b>Definition</b>
HIP	Highway Improvement Program
HRSR	heat recovery steam generator
HVTL	high voltage transmission line
hz	hertz
I	Interstate Highway
IAC	Illinois Administrative Code
IAWC	Illinois-American Water Company
ICC	Interstate Commerce Commission
ICDR	Initial Concept Design Report
IDLH	immediately dangerous to life and health
IDNR	Illinois Department of Natural Resources
IDOT	Illinois Department of Transportation
IEPA	Illinois Environmental Protection Agency
IGCC	Integrated Gasification Combined Cycle
IHPA	Illinois Historic Preservation Agency
ILDOA	Illinois Department of Agriculture
IPCC	Intergovernmental Panel on Climate Change
IRIS	Integrated Risk Information System
ISGS	Illinois State Geological Survey
ISWS	Illinois State Water Service
IWPA	Interagency Wetland Policy Act of 1989
kV	kilovolt
kV/m	kilovolts per meter
LESA	Land Evaluation and Site Assessment
LFL	lower flammable limit
LiDAR	Light Detection and Ranging

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<b>Acronym</b>	<b>Definition</b>
LOS	level of service
LWDs	Lost Work Days
md	millidarcy
MDEA	methyl diethanolamine
mG	milligauss
MGD	million gallons per day
MGSC	Midwest Geological Sequestration Consortium
MISO	Midwest Independent System Operator
MLD	million liters per day
MM&V	monitoring, mitigation, and verification
MMT	million metric tons
MPO	Midland-Odessa Metropolitan Planning Organization
MSDS	Material Safety Data Sheet
MVA	megavolt-ampere
MW	megawatts
MWe	megawatts-equivalent
MWh	megawatt-hours
NAAQS	National Ambient Air Quality Standard
NEP	National Energy Policy
NEPA	National Environmental Policy Act
NESHAPs	National Emissions Standards for Hazardous Air Pollutants
NETL	National Energy Technology Laboratory
NFPA	National Fire Protection Association
NHPA	National Historic Preservation Act
NIEHS	National Institute of Environmental Health Sciences
NIOSH	National Institute of Occupational Safety and Health

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<b>Acronym</b>	<b>Definition</b>
NNL	National Natural Landmark
NOA	Notice of Availability
NOAA	National Oceanic Atmospheric Administration
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
NPS	National Park Service
NRCS	Natural Resource Conservation Service
NRHP	National Register of Historic Places
NRNL	National Registry of Natural Landmarks
NSPS	New Source Performance Standards
NSR	New Source Review
NWI	National Wetlands Inventory
OPS	Office of Pipeline Safety
OSHA	Occupational Safety and Health Administration
PCBs	polychlorinated biphenyls
PCEs	passenger car equivalents
PEL	permissible exposure limit
PFTs	perfluorocarbon tracers
PM	particulate matter
PNNL	Pacific Northwest National Laboratory
ppm	parts per million
ppmv	parts per million volume
PPV	peak particle velocity
PRB	Powder River Basin
PSD	Prevention of Significant Deterioration
psi	pounds per square inch

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<b>Acronym</b>	<b>Definition</b>
PUCT	Public Utility Commission of Texas
<b>R&amp;D</b>	<b><i>Research and Development</i></b>
RCRA	Resource Conservation and Recovery Act
RCT	Railroad Commission of Texas
REL	Reference Exposure Levels
RFP	Request for Proposal
RMS	root-mean-square
ROD	Record of Decision
ROI	region of influence
ROW	right-of-way
SAL	State Archeological Landmark
SCADA	Supervisory Control and Data Acquisition
SCAQMD	California South Coast Air Quality Management District
SCR	selective catalytic reduction
SDTP	sanitary district treatment lant
SERC	Southeastern Electric Reliability Corporation
SH	State Highway
SHPO	State Historic Preservation Officer
SIPs	State Implementation Plans
SOTA	state-of-the-art
SPCC	spill prevention, control and countermeasure
SPL	sound pressure level
SR	State Route
SRU	sulfur recovery unit
ST	Short Term
STEL	short-term exposure limit

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<b>Acronym</b>	<b>Definition</b>
STOMP	Subsurface Transport Over Multiple Phases
STRANET	Strategic Highway Network
SWPPP	Stormwater Pollution Prevention Plan
T&E	threatened and endangered (species)
TAC	Texas Administrative Code
TARL	Texas Archeological Sites Atlas Database
TCEQ	Texas Commission on Environmental Quality
TCP	Traditional Cultural Property
TDCJ	Texas Department of Criminal Justice
TDS	total dissolved solids
TEC	Taylorville Energy Center
THC	Texas Historical Commission
TLO	Texas Legislation Online
TMDL	total maximum daily load
TNP	Texas New Mexico Power Cooperative
TPWD	Texas Parks and Wildlife Department
tpy	tons per year
TR	Township Road
TRCs	Total Recordable Cases
TSD	treatment, storage, or disposal
TTC	Trans Texas Corridor
TWA	time-weighted average
TWCC	Texas Westmoreland Coal Company
TWDB	Texas Water Development Board
TWTL	two-way turn lane
TxDOT	Texas Department of Transportation

<b>Acronym</b>	<b>Definition</b>
UIC	Underground Injection Control
US	US Highway
USACE	United States Army Corps of Engineers
USBLS	U.S. Bureau of Labor Statistics
USC	United States Code
USDA	U.S. Department of Agriculture
USDW	Underground Source of Drinking Water
USFS	U.S. Forest Service
USGS	U.S. Geological Survey
vdB	velocity decibels
VOCs	volatile organic compounds
vpd	vehicles per day
WTWSS	West Texas Water Supply System
WWTP	wastewater treatment plant
ZLD	zero liquid discharge

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# 1. PURPOSE AND NEED FOR AGENCY ACTION

## 1.1 INTRODUCTION

This chapter introduces the Proposed Action and describes the purpose and need for the agency action and the scope of the Environmental Impact Statement (EIS). This chapter also summarizes the National Environmental Policy Act (NEPA) of 1969 process, project objectives, and the public scoping process undertaken for this EIS.

This EIS has been prepared by the U.S. Department of Energy (DOE) in compliance with NEPA of 1969 (42 United States Code [USC] 4321 et seq.) regulations for implementing NEPA as established by the Council of Environmental Quality (CEQ) (40 Code of Federal Regulations [CFR] Parts 1500 to 1508), and DOE NEPA procedures (10 CFR Part 1021). This EIS evaluates the potential environmental impacts associated with the Proposed Action at each of the four alternative sites. DOE will use this EIS to decide which, if any, of the alternative sites are acceptable to DOE for hosting the FutureGen Project.

## 1.2 PROPOSED ACTION

DOE proposes to provide financial assistance for the FutureGen Alliance, Inc. (Alliance) to plan, design, construct, and operate the FutureGen Project. Members of the Alliance are presented in Section 1.4. DOE has identified four reasonable alternative sites and will determine which sites, if any, are acceptable to DOE to host the FutureGen Project. The four sites currently being considered as reasonable site alternatives for the FutureGen Project are:

- Mattoon, Illinois;
- Tuscola, Illinois;
- Jewett, Texas; and
- Odessa, Texas.

In a March 2004 Report to Congress, DOE estimated the cost of the project at \$950 million in constant 2004 dollars shared at a 74/26 ratio by DOE and the Alliance. Accounting for escalation, based on representative industry indices, the project is currently estimated to cost \$1,757,232,310 in as-spent dollars. Including \$300,800,000 in expected revenues from the sale of electricity, which would be used to offset operational costs and research and development expenses, the total net project cost is estimated to be \$1,456,432,310 in as-spent dollars. DOE will share approximately 74 percent of the net cost (estimated at \$1,077,760,230), which includes at least \$80 million in projected contributions from foreign governments. The Alliance will share approximately 26 percent of the net cost (estimated at \$378,672,080). The cost estimate will be updated as work progresses.

The FutureGen Project would be a research facility as well as the cleanest coal-fueled power system in the world for co-producing electricity and hydrogen (H<sub>2</sub>). The facility would incorporate cutting-edge research, as well as development of promising new energy-related technologies at a commercial scale, to achieve DOE's goal of validating the technical and economic feasibility of a coal-fueled power plant that achieves low carbon emissions. A key goal of the project would be to sequester at least 90 percent of the plant's carbon dioxide (CO<sub>2</sub>) emissions with the future potential to capture and sequester nearly 100 percent. Low carbon emissions would be achieved by integrating CO<sub>2</sub> capture and sequestration operations with the proposed power plant. Performance and economic test results from the FutureGen Project would be shared among participants, industry, the environmental community, and the public. The Proposed Action is discussed in detail in Chapter 2.

### 1.3 PURPOSE AND NEED FOR AGENCY ACTION

Agency action is needed to support the President's FutureGen Initiative (February 27, 2003), which is based on recommendations in the National Energy Policy (NEP), issued in May 2001 (NEP, 2001). The NEP cites, in broad terms, the need to promote diverse and secure sources of energy and the expected need for coal to play a significant role in providing that energy. The NEP specifically states, "In the long term, the goal of the [clean coal technology] program is to develop low cost, zero-emission power plants with efficiencies close to double that of today's fleet." Action is also needed to support the President's announcement emphasizing the need for the FutureGen Initiative to support other federal initiatives, including the National Climate Change Technology Initiative (June 11, 2001) and the Hydrogen Fuel Initiative (January 28, 2003). These initiatives aim to reduce the Nation's output of greenhouse gas (GHG) emissions to improve the global environment and provide advanced technologies to meet the world's energy needs.

As the Nation's most abundant fossil fuel resource, coal must play an important role in the Nation's efforts to increase its energy independence. However, there is a need to address the associated environmental and climate change challenges related to the continued use of coal. The Intergovernmental Panel on Climate Change (IPCC) has concluded that global atmospheric concentrations of CO<sub>2</sub> have increased markedly since the pre-industrial period, and that the primary source of the increase results from fossil fuel use (IPCC, 2007). The IPCC was established by the United Nations Environmental Programme and the World Meteorological Organization to assess the scientific, technical, and socioeconomic information relevant for the understanding of human induced climate change.

CO<sub>2</sub> accounts for 83 percent of the total U.S. GHG emissions. The CO<sub>2</sub> emissions from the U.S. electric power sector have grown 32 percent since 1990 (compared to 2005), while in comparison, total CO<sub>2</sub> emissions (from all reported sources) have grown by 16.9 percent. Electric power generation now contributes 40 percent of all CO<sub>2</sub> emission in the U.S. In 2005, 82 percent of all electricity production CO<sub>2</sub> emissions resulted from the burning of coal (EIA, 2006).

Fuels used in transportation account for one-third of the Nation's GHG emissions, and an alternative source of transportation fuel, such as coal-derived H<sub>2</sub> fuel, could help reduce GHG emissions. Therefore, methods are needed to more economically and efficiently produce H<sub>2</sub> fuel (e.g., through coal gasification) and to use it for power generation (e.g., through advanced fuel cells).

The FutureGen Project is needed to support these initiatives and recommendations and to foster technology at future low carbon emissions power plants over the next decade to provide the breakthroughs that would dramatically reduce GHG emissions over the longer term. Widespread replication of low carbon emissions technology by the private sector would help meet the needs of our Nation's economy, while reducing risks associated with emissions of GHGs.

**FutureGen Initiative:** *"Today I am pleased to announce that the United States will sponsor a \$1 billion, 10-year demonstration project to create the world's first coal-based, zero-emissions electricity and hydrogen power plant. This project will be undertaken with international partners and power and advanced technology providers to dramatically reduce air pollution and capture and store emissions of greenhouse gases. We will work together on this important effort to meet the world's growing energy needs, while protecting the health of our people and our environment."*

President George W. Bush  
February 27, 2003

## 1.4 FUTUREGEN PROJECT

The FutureGen Project would provide a platform to test advanced technologies for producing both electricity and H<sub>2</sub> from coal (DOE, 2003). DOE, as well as other parties, may conduct technology research and development activities using this platform. Electricity and H<sub>2</sub> production would be based on the design concept known as the Integrated Gasification Combined Cycle (IGCC) system, which has the potential for increasing energy conversion efficiency while reducing air pollutant emission rates. Geologic sequestration of CO<sub>2</sub> would be a unique component of the project and would help achieve low carbon emissions during normal steady-state operation. CO<sub>2</sub> would be captured and sequestered (i.e., stored) in deep underground saline formations.

The lead organization for the proposed federal action is the National Energy Technology Laboratory (NETL), a multi-purpose laboratory operated by DOE's Office of Fossil Energy. NETL has a mission to solve the environmental, supply, and reliability constraints of producing and using fossil energy resources to promote a stronger economy and a more secure future for America. The DOE goal for this project is to prove the technical feasibility and potential economic viability of co-production of electricity and H<sub>2</sub> fuel from coal, while capturing and sequestering CO<sub>2</sub> and greatly reducing other air emissions.

The Alliance, formed to partner with DOE on the FutureGen Project, is a non-profit consortium of some of the largest coal producers and electricity generators in the world. Member companies are American Electric Power, Anglo American Services Limited, BHP Billiton Energy Coal Inc., China Huaneng Group, CONSOL Energy, E.ON U.S. LLC, Foundation Coal Corporation, Peabody Energy Corporation, PPL Energy Services Group LLC, Rio Tinto Energy America Services, Southern Company Services, and Xstrata Coal. Collectively, these member companies have global operations serving customers across six continents (FG Alliance, 2006). The Alliance, using the siting process described in Chapter 2, Proposed Action and Alternatives, identified the four sites that DOE has determined are the reasonable site alternatives to be considered in this EIS.

### 1.4.1 FUTUREGEN PROJECT TECHNOLOGY

While IGCC technology is currently used in coal-fueled power plants in both the U.S. and abroad, none of these plants includes a geologic sequestration or H<sub>2</sub> production component. Objectives for the FutureGen Project are presented in Table 1-1 in Section 1.4.2, as derived from DOE's March 2004 Report to Congress (DOE, 2004).

In a typical IGCC power plant, the gasification process combines coal, oxygen (O<sub>2</sub>), and steam to produce a H<sub>2</sub>-rich combustible gas, called "synthesis gas." The FutureGen Project would be different because, after the gas exits the gasifier, the composition of the synthesis gas would then be "shifted" by the addition of water vapor to produce additional H<sub>2</sub>. The product stream would then consist mostly of H<sub>2</sub>, steam, and CO<sub>2</sub>. After separation of these three gaseous components, the H<sub>2</sub> would be used to generate electricity in a gas combustion turbine. Steam from the process would then be condensed, treated, and recycled into the gasification system or added to the plant's cooling water circuit. CO<sub>2</sub> from the process would be sequestered in deep underground geologic formations that would be monitored to verify the permanence of CO<sub>2</sub> storage.

**IGCC** is a coal-fired, integrated gasification combined cycle electric power generation system with capability for both pre- and post-combustion emission controls.

**Geologic Sequestration** is the placement of CO<sub>2</sub> or other GHGs into a geologic formation in such a way that it remains permanently stored.

A **gasifier** produces a combustible gas from coal. The gas fuels a combustion turbine (similar to an aircraft engine) to produce electricity. Heat coming out of the combustion turbine is used to generate steam that powers a steam turbine for additional production of electricity.

## 1.4.2 FUTUREGEN PROJECT OBJECTIVES

The FutureGen Project would be designed to create a capability for full-scale testing of new technologies in support of their commercial deployment. The FutureGen Project may integrate some combination of new technologies for gasification, O<sub>2</sub> production, H<sub>2</sub> production, synthesis gas cleanup, H<sub>2</sub> turbines, CO<sub>2</sub> sequestration, advanced materials, instrumentation, sensors and controls, byproduct use, and water management. Decisions regarding the incorporation of specific technologies in plant design would be made by the Alliance in coordination with DOE. Technologies identified would be consistent with the overall project objectives (see Table 1-1).

**Table 1-1. FutureGen Project Objectives**

<b>Overall Objectives</b>
<ul style="list-style-type: none"> <li>• Establish technical and economic feasibility of producing electricity and H<sub>2</sub> from coal with reduced GHG emissions;</li> <li>• Verify sustained, integrated operation of a coal conversion system with geologic sequestration of CO<sub>2</sub>;</li> <li>• Verify the effectiveness, safety, and permanence of geologic sequestration of CO<sub>2</sub>;</li> <li>• Establish standardized technologies and protocols for geologic CO<sub>2</sub> sequestration monitoring, mitigation, and verification (MM&amp;V);</li> <li>• Confirm the potential of the FutureGen Project concept to achieve economic competitiveness with other approaches through advances in technology by 2020; and</li> <li>• Gain acceptance by the coal and electricity industries, environmental community, international community, and public-at-large for the concept of coal-fueled systems with near-zero emissions through the successful operation of the FutureGen Project.</li> </ul>
<b>Facility Performance Objectives</b>
<ul style="list-style-type: none"> <li>• Capture at least 90 percent of CO<sub>2</sub> and sequester CO<sub>2</sub> at an operational rate of at least 1.1 million tons (1 million metric tons [MMT]) per year in a deep saline formation;</li> <li>• Produce electricity and H<sub>2</sub> consistent with market needs at ratios equivalent to 275 megawatt net output;</li> <li>• Locate plant consistent with adequate coal feedstock availability, proximity to market for products (especially electricity) as part of proving potential economic viability, and proximity to geologic formations for sequestration (e.g., deep saline formations, unmineable coal seams, depleted oil and natural gas reservoirs, and basalt formations);</li> <li>• Achieve environmental requirements;</li> <li>• Provide a design database for subsequent commercial demonstrations or deployments; and</li> <li>• Design a capability for full-flow testing of advanced technologies and advanced technology modules, and design incorporation of loosely integrated units that increase flexibility and enhance operability and reliability.</li> </ul>
<b>CO<sub>2</sub> Sequestration, Monitoring, Mitigation, and Verification Objectives</b>
<ul style="list-style-type: none"> <li>• Accurately quantify storage potential of the geologic formation(s);</li> <li>• Detect and monitor surface and subsurface leakage, if it occurs (with capability to measure CO<sub>2</sub> slightly above atmospheric concentration of 370 parts per million), and demonstrate effectiveness of mitigation;</li> <li>• Provide the scientific basis for carbon accounting and assurance of permanent storage;</li> <li>• Account for co-sequestration of CO<sub>2</sub> and other gases; and</li> <li>• Develop information necessary to estimate costs of future CO<sub>2</sub> management systems.</li> </ul>

Source: DOE, 2004.

## 1.5 NATIONAL ENVIRONMENTAL POLICY ACT

NEPA requires all federal agencies to include, in every recommendation or report on proposals for major federal actions significantly affecting the quality of the human environment, a detailed statement by the responsible official on (1) the environmental impact of the Proposed Action; (2) any adverse environmental effects that cannot be avoided should the proposal be implemented; (3) alternatives to the Proposed Action; (4) the relationship between local short-term uses of the environment and the maintenance and enhancement of long-term productivity; and (5) any irreversible and irretrievable commitments of resources that would be involved in the Proposed Action should it be implemented. The Act also requires consultations with federal agencies that have jurisdiction or special expertise with respect to any environmental impact involved. The detailed statement along with the comments and views of consulted governmental agencies, must be made available to the public.

DOE determined that providing financial assistance for the construction and operation of the FutureGen Project would constitute a major federal action that could significantly affect the quality of the natural and human environment. Therefore, DOE has prepared this EIS in compliance with requirements for implementing NEPA as established by the CEQ regulations (40 CFR Parts 1500 to 1508), DOE regulations (10 CFR Part 1021), and DOE procedures for implementing NEPA.

DOE published an Advance Notice of Intent (ANOI) to prepare an EIS in the *Federal Register* on February 16, 2006 (71 FR 8283). Later, DOE published a Notice of Intent (NOI) in the *Federal Register* on July 28, 2006 (71 FR 42840) to initiate public scoping, as described in Section 1.6.1, to begin the NEPA process and the public scoping process to identify the reasonable site alternatives. Both DOE and the Site Proponents consulted with various interested governmental agencies to further define the scope of the EIS. Coordination letters resulting from these consultations are provided in Appendix A.

Following publication in the *Federal Register* of a Notice of Availability (NOA) of the Draft EIS by the U.S. Environmental Protection Agency (EPA), there *was* a 45-day public review and comment period. During this period, public hearings *were* held at locations near each of the alternative sites. DOE considered and responded to comments received on the Draft EIS both individually and collectively and *this* Final EIS addresses the comments received. Not less than 30 days after EPA publishes an NOA of the Final EIS, DOE will publish a Record of Decision (ROD) in the *Federal Register* that explains the agency's decision on whether to fund the FutureGen Project and, if so, which of the alternative sites would be acceptable to host the FutureGen Project.

## 1.6 SCOPE OF THE ENVIRONMENTAL IMPACT STATEMENT

### 1.6.1 NEPA SCOPING PROCESS

This EIS assesses the potential environmental impacts of the Proposed Action at each of four candidate sites within the scope of the FutureGen Project and the No-Action Alternative. The scope of this EIS was determined by DOE after consultation with state and federal agencies and involvement of the public.

Figure 1-1 illustrates the steps during the EIS process. DOE published an ANOI to prepare the EIS in the *Federal Register* on February 16, 2006 (71 FR 8283). Later, DOE published a NOI in the *Federal Register* on July 28, 2006, to identify the reasonable site alternatives and initiate the public scoping process (71 FR 42840).

During the public scoping period, DOE solicited public input to ensure that (1) significant issues would be identified early and properly studied; (2) issues of minimal significance would not consume

excessive time and effort; and (3) the EIS would be thorough and balanced. The public scoping period ended on September 13, 2006, after a 47-day comment period.

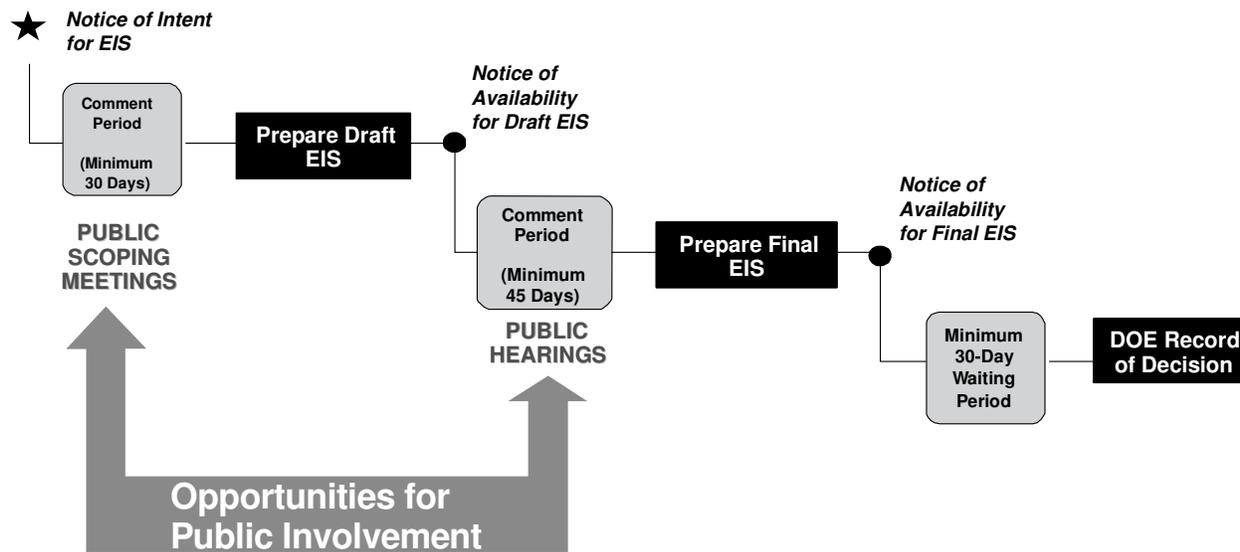


Figure 1-1. Steps in the NEPA Process

DOE published a Notice of Public Scoping Meetings in the *Federal Register* on August 4, 2006 (71 FR 44275). There were four public scoping meetings for the FutureGen Project EIS with one held near each of the alternative sites. The dates and locations of these meetings are shown in Table 1-2. DOE published notices in local newspapers announcing the meeting locations and times during the weeks of August 13, 20, and 27, 2006.

Table 1-2. Public Scoping Meeting Locations and Dates

Public Meeting Location	Date
Mattoon, Illinois Riddle Elementary School, Mattoon, Illinois	August 31, 2006
Tuscola, Illinois Tuscola Community Building, Tuscola, Illinois	August 29, 2006
Jewett (Fairfield), Texas City of Fairfield's Green Barn, Fairfield, Texas	August 22, 2006
Odessa (Midland), Texas Center for Energy and Economic Diversification (CEED) Building, Midland, Texas	August 24, 2006

Each scoping meeting began with an informal open house from 4:00 pm to 7:00 pm during which time attendees were given information packages about the project and were able to view project-related posters. DOE and Alliance representatives were available to answer questions. Alliance representatives were also available at displays illustrating various features of the proposed project. The informal open house was followed by a formal DOE presentation and the formal comment period. Appendix B provides additional information on the NEPA public scoping process.

## 1.6.2 PUBLIC SCOPING COMMENTS RECEIVED

DOE accommodated several methods for submitting comments on the scope of the EIS. A court reporter was present at each meeting to ensure that all spoken comments during the formal meeting were recorded and transcribed. In addition, anyone who wished to give comments in writing was invited to do so at the public meetings by completing a comment card and submitting it to DOE at the meeting. DOE also offered an e-mail address, a postal address, a facsimile number, and a toll-free telephone number for members of the public to submit their comments. In all, respondents submitted 318 comments via e-mail, mail, facsimile, telephone, or formal oral comment at the public meetings.

The majority of the comments were related to the use of natural resources (e.g., coal, land, and water), the discharge of pollutants to the natural environment (e.g., air and water), and the socioeconomic impacts of the project (e.g., jobs, taxes, and property values). Table 1-3 lists the composite set of issues identified during public scoping for consideration in the EIS. Issues are discussed and analyzed in this EIS in accordance with their relative importance. The most detailed analyses focus on air quality, water resources, noise, and safety, health, and accidents.

**Table 1-3. Issues Identified During Public Scoping**

<b>Purpose and Need</b>
<ul style="list-style-type: none"> <li>• Demonstration of need for the proposed project.</li> <li>• Consideration of alternatives such as wind or solar power, energy conservation.</li> </ul>
<b>Environmental Resources</b>
<ul style="list-style-type: none"> <li>• Air Quality: Potential impacts from air emissions (including mercury, volatile organic compounds [VOCs], and particulate matter [PM]) during construction and operation of the power plant and impacts to sensitive receptors. Impacts of dust from construction, transportation, and storage of materials. Potential impacts on National Ambient Air Quality Standards (NAAQS).</li> <li>• Geology and Soils: Potential for activation of surface or subsurface faults. Potential for seismic activity from carbon sequestration.</li> <li>• Water Resources: Potential impact to drinking water supplies and freshwater aquifers. Potential impacts to surface water and groundwater flow and to water resources from wastewater discharge or runoff.</li> <li>• Wetlands and Floodplains: Potential impacts to wetlands and floodplains.</li> <li>• Ecological Resources: Potential on-site and off-site impacts to vegetation, terrestrial and aquatic wildlife, threatened and endangered species, and ecologically sensitive habitats.</li> <li>• Cultural Resources: Potential for impacts to Native American cultural resources.</li> <li>• Land Use: Potential impacts to prime farmland and conversion of land use from farming to industrial use. Use of site after plant closure. Property rights to store CO<sub>2</sub> under adjoining property.</li> <li>• Aesthetics: Impacts on viewsheds to residences, including views of transmission lines.</li> <li>• Transportation and Traffic: Potential impacts to local traffic patterns, safety at railroad crossings, and traffic controls. Transportation and roadway infrastructure impacts from rail and truck transport of coal to the plant. Need for upgrades or improvements to local roadway infrastructure.</li> <li>• Noise and Vibration: Noise levels generated from the unloading of coal from railcars and switching the train cars. Impacts to sensitive receptors from increased noise levels.</li> <li>• Materials and Waste Management: Impact of accumulating piles of ash/slag and sulfur generated by the gasification process. Reuse or disposal of byproducts of the coal gasification process. The method and location by which solid and hazardous waste would be disposed, including mercury containing materials and ash/slag.</li> <li>• Human Health, Safety, and Accidents: The potential danger of an explosion at the plant to local community and the community safety measures that would be taken. The potential danger of a terrorist attack. Potential impact of electromagnetic fields on people who live near the proposed transmission lines, substations, and transformers.</li> <li>• Risk Assessment: Development of a monitoring program of the carbon sequestration to detect leaks from the carbon sequestration system and a maintenance program to repair leaks. Potential for a catastrophic release and the actions that would be taken in the event of a release. Potential for carbon sequestration to reverse subsidence. Potential for releases through oil, gas, or water wells to the aquifer system and potential impacts</li> </ul>

**Table 1-3. Issues Identified During Public Scoping**

to these existing wells. Stress limits of the CO <sub>2</sub> injection system and prediction of when CO <sub>2</sub> migration will stop in relation to property boundaries on the surface. Potential for sequestered CO <sub>2</sub> to impact drinking water sources and the risk of movement between aquifers or into the atmosphere.
<ul style="list-style-type: none"><li>• Community Services and Socioeconomics: Socioeconomic impacts on local job market, taxes, and impacts to property values, and commercial and residential growth. Use of the power plant after DOE involvement has ended. Impacts to emergency services (e.g., police and fire support).</li></ul>
<b>Cumulative Impacts</b>
<ul style="list-style-type: none"><li>• Cumulative Impacts: Potential cumulative impacts that could result from the incremental impacts of the proposed project when added to the other past, present, and reasonably foreseeable future projects.</li></ul>

DOE has addressed all substantive comments in this EIS. However, some comments received are outside the scope of this EIS. For example, several respondents indicated that the EIS should include alternatives such as the utilization of renewable energy resources (e.g., wind and solar power). Because the particular goal of the FutureGen Project is to demonstrate an advanced power generation facility based on fossil fuels, specifically coal, technologies that would not be based on coal use are not within the scope of this EIS. However, DOE oversees numerous programs that are investigating and supporting a wide variety of energy generation technologies, including many based on renewable sources, as well as programs that promote energy conservation. Questions were also raised regarding the environmental and safety impact of coal mining. However, coal is a commercial fuel produced by a regulated industry. There would be no change in nationwide coal production and, therefore, there should be no change in environmental impacts to mining. Hence, DOE considers the environmental impacts of coal mining policies and operations to be outside the scope of this EIS.

### 1.6.3 AGENCY DECISION-MAKING PROCESS

NEPA requires that agencies evaluate reasonable alternatives to the Proposed Action in an EIS. The purpose and need for the agency action determines the range of reasonable alternatives. In this case, DOE proposes to provide financial assistance to the Alliance for the design, construction, and operation of the first coal-fueled plant to produce electricity and H<sub>2</sub> with geologic sequestration of CO<sub>2</sub>. DOE believes the electric utility and coal industries should lead the project because of their experience in implementing power plant projects and because those industries have a significant interest in the success and subsequent commercial deployment of low carbon emissions technology.

In particular, this EIS identifies and analyzes the potential environmental impacts of the FutureGen Project at the four alternative site locations. Should more than one site be approved by DOE in a ROD, the host site would be selected by the Alliance. Once the host site is selected, the Alliance would conduct additional site characterization studies; prepare a site-specific design; and obtain relevant environmental, utility, and operational permits for the project. Appendix C provides a summary of potential federal and state permits and requirements.

Decisions on incorporation of specific technologies would be made by the Alliance consistent with the overall project goal of proving the technical and economic feasibility of carbon capture and geologic sequestration emissions. When identifying technology alternatives, the Alliance started with a list of major components and subsystems of the power plant facility and then created a matrix of potential configurations of equipment. The matrix of potential configurations has been gradually reduced to a general configuration and list of conservative operating parameters (e.g., an upper bound for possible air emissions of various pollutants, other waste streams, and land impacts) that serve as the basis for the analyses in this EIS.

Descriptions of the alternatives and evaluations of potential impacts included in this EIS are intended to assist the federal decision-makers in choosing whether to fund the project and which sites, if any, should be considered further. If DOE elects to provide further financial assistance for the FutureGen Project, the agency may also specify measures to mitigate potential impacts as identified in the NEPA process. In the absence of DOE funding (the No-Action Alternative), the Alliance may still elect to construct and operate the proposed IGCC power plant if it can obtain the additional funding and required permits. However, in the absence of DOE participation, it is unlikely the FutureGen Project would be implemented.

No sooner than 30 days after publication of EPA's NOA of the Final EIS in the *Federal Register*, DOE will announce in a ROD selection of either the No-Action Alternative or the Proposed Action with those sites acceptable to DOE. If DOE decides to implement the Proposed Action, the Alliance will subsequently select a host site from among those sites, if any, that are identified in the ROD as acceptable to DOE.

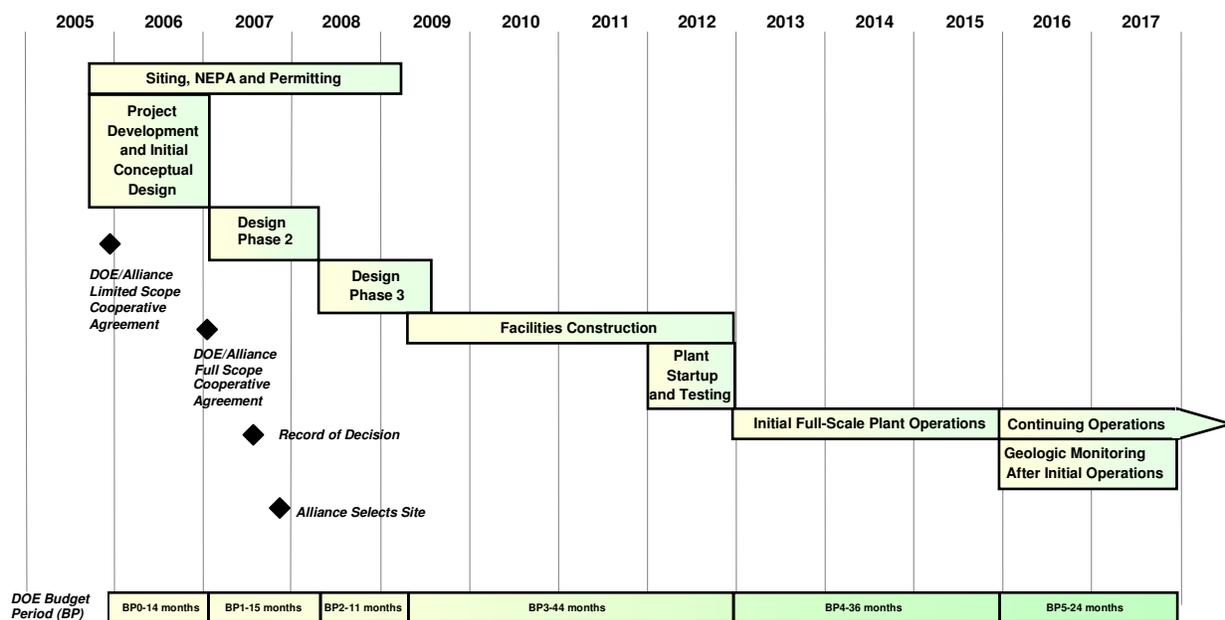
After selection of the host site, the Alliance would conduct additional site characterization work on the chosen site. This information would support site-specific design work for the FutureGen Project. Both the additional site information and the site-specific design work would be reviewed by DOE and would support the completion of a Supplement Analysis (see 10 CFR 1021.314) by DOE to determine if there are substantial changes in the Proposed Action or significant new circumstances or information relevant to environmental concerns, as discussed in 40 CFR 1502.9(c). Based on the Supplement Analysis, DOE will determine whether a Supplemental EIS should be prepared.

### **1.6.3.1 Interagency Cooperation**

EPA staff participated in the development of the site selection criteria used in the solicitation and evaluation of the site proposals, reviewed and provided input to DOE's plan for conducting a risk assessment of underground storage of CO<sub>2</sub>, and reviewed and commented on the preliminary version of *the* Draft EIS.

### **1.6.3.2 Relationship Between DOE and the Alliance**

On March 23, 2007, DOE and the Alliance signed a Full Scope Cooperative Agreement (the Agreement) to undertake the FutureGen Project. The Agreement defines the terms and conditions for financial assistance, including DOE's oversight role. Under the Agreement, the Alliance would be primarily responsible for implementing the FutureGen Project. DOE would guide the Alliance at a programmatic level to ensure that the FutureGen Project meets DOE's objectives. In addition to programmatic-level guidance, DOE retains certain review and approval rights for major project decisions and oversees the Alliance's compliance with the terms of the Agreement. The FutureGen Project is comprised of six budget periods with continuation of the project into each subsequent budget period contingent upon the approval of a continuation application. The first budget period (Budget Period 0) was completed under a Limited Scope Cooperative Agreement that provided an opportunity to examine the feasibility of the project. The current Budget Period 1 of the Full Scope Cooperative Agreement will cover the remainder of the NEPA process, site selection, detailed characterization of the selected site, and preliminary design work. Figure 1-2 illustrates the Full Scope Cooperative Agreement Timeline.



**Figure 1-2. FutureGen Project Full Scope Cooperative Agreement Timeline**

The FutureGen Project would move between budget periods only after DOE review and approval of continuation applications submitted by the Alliance. Continuation funding would be contingent on (1) availability of funds; (2) satisfactory progress towards meeting the objectives of the previously approved application; (3) compliance with the terms and conditions of the Agreement; and (4) such other terms as the parties agree.

The Alliance would hold legal title to the FutureGen facility subject to DOE’s rights under DOE regulations and the Agreement. During the performance of the Full Scope Cooperative Agreement, DOE and the Alliance would develop a mutually acceptable plan for project disposition, which may include continued operation of the facility by the Alliance or some other party in a research or commercial mode.

DOE is responsible for NEPA compliance. For the alternative sites, the Alliance and the Site Proponents (Mattoon and Tuscola, Illinois and Jewett and Odessa, Texas) have provided design information and planning details and facts, which have been independently reviewed by DOE. Information supplied by the Alliance and by the Site Proponents has been reviewed and verified by DOE and used in preparation of this EIS.

## **1.7 PUBLIC HEARINGS**

*DOE announced the availability of the Draft EIS in a NOA published in the Federal Register on June 1, 2007. During the comment period (June 1, 2007 to July 16, 2007), the DOE held four public hearings for the FutureGen Project Draft EIS; the dates and locations of these hearings are shown in Table 1-4. The hearing locations were selected based on their close proximity to the alternative site locations in Texas and Illinois. Three of the four hearings were in the same locations as the scoping meetings. The public hearings were announced in the June 1, 2007, Federal Register notice. In addition, DOE published notices in local newspapers during the weeks of June 11, 18, and 25, 2007.*

**Table 1-4. Public Hearing Locations and Dates**

<b>Location</b>	<b>Date</b>
<b>Odessa (Midland), Texas</b> <b>Center for Energy and Economic Diversification (CEED) Building, Midland, Texas</b>	<b>June 19, 2007</b>
<b>Jewett (Buffalo), Texas</b> <b>Buffalo Civic Center, Buffalo, Texas</b>	<b>June 21, 2007</b>
<b>Mattoon, Illinois</b> <b>Riddle Elementary School, Mattoon, Illinois</b>	<b>June 26, 2007</b>
<b>Tuscola, Illinois</b> <b>Tuscola Community Building, Tuscola, Illinois</b>	<b>June 28, 2007</b>

*Comments on the Draft EIS were received during the comment period via telephone, fax, e-mail, and mail. In addition, comment forms were completed and given to DOE during the public hearings. Oral comments were also given and transcribed at each of the public hearings.*

*Each public hearing began with an informal open house from 4:00 to 7:00 pm (Central Daylight Saving Time) during which time attendees were given information packages about the project and were able to view project related posters. DOE FutureGen Project personnel were available to answer questions. Representatives of the FutureGen Alliance, Inc. and local representatives were also available at displays illustrating various features of the proposed project and proposed sites.*

*The informal open house was followed by a formal DOE presentation and the formal public hearing. Collectively, 554 individuals attended the public hearings (see Table 1-5); a few individuals attended more than one meeting.*

**Table 1-5. Number of People in Attendance at Public Hearings**

<b>Meeting Location</b>	<b>Number of People in Attendance<sup>1</sup></b>
<b>Odessa (Midland), Texas</b>	<b>76</b>
<b>Jewett (Buffalo), Texas</b>	<b>124</b>
<b>Mattoon, Illinois</b>	<b>151</b>
<b>Tuscola, Illinois</b>	<b>203</b>
<b>Total</b>	<b>554</b>

<sup>1</sup> Based on individuals who signed the attendance sign-in sheets.

*All attendees were invited to provide comments, either written or spoken, on the proposed project. Those attendees wishing to speak were given an opportunity to sign up to do so. Comment sheets were made available for all attendees wishing to provide written comments.*

*DOE led the presentations and presided over the four formal meetings. A court reporter was present at each meeting to ensure that all oral comments were recorded and legally transcribed. A total of 60 individuals presented oral comments. In addition, individuals could request to receive the Draft EIS and/or the Final EIS (either a hard copy or a hard copy summary plus a CD containing the entire EIS).*

*Anyone who wished to provide comments in writing was invited to do so by completing a comment card and giving it to a DOE FutureGen Project Team member at the public hearing or mailing in a postcard format comment card at a later date. DOE also provided an e-mail address for members of the public who preferred to submit their comments electronically, a postal address for those who preferred to mail their comments, a telephone fax number for those who preferred to fax their comments, and a toll-free telephone number for those who preferred to provide spoken comments.*

*In preparing the Final EIS, DOE considered all comments to the extent practicable. An identification number was assigned to each originator of comments (i.e., per commentor), including those verbally expressed at the public hearings. A total of 175 individuals, organizations, and agencies provided comments on the Draft EIS. A majority of the comments received stated support for the project. After reviewing the comment documents received, a list of issues was developed (see Table 1-6).*

**Table 1-6. General Comments from Public Hearings**

<b>Aesthetics</b>	Concerns were expressed regarding the design of the plant. Comments were received requesting that the FutureGen Plant be aesthetically pleasing.
<b>CO<sub>2</sub> Sequestration</b>	Concerns were expressed regarding the sequestration of CO <sub>2</sub> . Specifically: <ul style="list-style-type: none"> <li>• potential for long term effects of injected CO<sub>2</sub> in the subsurface-mingling of CO<sub>2</sub> with deep subsurface gasses;</li> <li>• the manner in which CO<sub>2</sub> stays underground;</li> <li>• potential for well leaks and pipeline leaks;</li> <li>• hazardous properties of CO<sub>2</sub> (in the pipelines and wells);</li> <li>• impacts of CO<sub>2</sub> on coal mining; and</li> <li>• short-term fate, ultimate fate, plume growth and movement and potential for earthquakes to either affect the storage or to be generated by the storage of CO<sub>2</sub>.</li> </ul>
<b>Economy, Employment, and Income</b>	Individuals questioned whether there would be compensation for CO <sub>2</sub> storage under their property. They also expressed concern about property devaluation, crop reduction, and impacts to taxpayers. Individuals asked about potential employment opportunities at the FutureGen plant.
<b>Farming</b>	Concerns were expressed regarding impacts to farming and whether farmers will be compensated for their losses (e.g., field tiles or fertilizer).
<b>Groundwater</b>	Concerns were expressed regarding the sources of and impacts to groundwater.
<b>Noise</b>	Individuals expressed concern about noise from traffic and operations.
<b>Public Outreach</b>	Individuals requested access to DOE-sponsored animations or model demonstrations of geologic sequestration. Individuals would like further educational outreach on the topic of geologic sequestration.
<b>Risk Assessment</b>	Individuals living close to the proposed site locations expressed concern about the risks of leakage, the routes of leakage, and health effects. Individuals also questioned why Mattoon has higher risks under the accident and terrorism scenarios.
<b>Surface Water</b>	Individuals expressed concerns about controlling runoff from the power plant site and how rainfall runoff and downstream flooding will be mitigated.
<b>Technology</b>	People expressed concern that the technology associated with FutureGen will be outdated by the time the plant is constructed.
<b>Waste disposal</b>	Individuals expressed concern regarding the handling and disposal of waste such as ash, slag, mercury, arsenic and hazardous wastes.

## ***1.8 SUMMARY OF MAJOR CHANGES IN THE EIS***

*Comments received on the Draft EIS are detailed in Volume III, Chapter 13 (Comments and Responses on the Draft EIS). DOE has responded to these comments and addressed them in the Final EIS, as appropriate. A summary of the major comments and revisions in the EIS is provided as follows:*

*Preferred Alternative – DOE identified its Preferred Alternative, to provide financial assistance to the FutureGen Project, in the Summary, Section S.4.5 and Volume I, Chapter 2, Section 2.4.8.*

*Public Hearings Summary – A detailed discussion of the public hearings held in June 2007 is provided in Volume III, Chapter 13, and is summarized in the Summary, Section S.5.2 and in Chapter I, Section 1.7.*

*New Options for Mattoon Water Pipeline and Odessa Water and CO<sub>2</sub> Pipelines and for Mattoon Water Pipeline - To complete the site proposal process, the Alliance offered an opportunity for the Site Proponents to submit Best and Final Offers (BAFOs) on their proposals. Pursuant to directions from the Alliance, the four Site Proponents submitted BAFOs to the Alliance on August 1, 2007.*

*The Odessa and Mattoon Site Proponents provided additional water and CO<sub>2</sub> pipeline options for the Alliance to consider in its final siting decision. Neither the Tuscola nor Jewett Site Proponents put forward additional options or modifications for consideration that might have potential environmental impacts. Other information provided by the Site Proponents in their BAFOs relates solely to potential business arrangements between the Alliance and the Site Proponents.*

*The new Mattoon and Odessa options were not described in the Draft EIS. Nevertheless, as variations of the alternatives in the Draft EIS, DOE considered the potential environmental consequences of the new options in the Final EIS. New text is provided in the Summary in Section S.4.3 and in Volume I, Chapter 2, Sections 2.4.4 and 2.4.5.*

*Odessa CO<sub>2</sub> Pipeline Option – After issuance of the Draft EIS, continuing Alliance and DOE investigations revealed that it would not be feasible to transport CO<sub>2</sub> from the proposed power plant site at Odessa to the proposed injection well site using the PetroSource Val Verde CO<sub>2</sub> pipeline located east of the injection site, as stated in the Draft EIS. Therefore, Odessa has offered two additional CO<sub>2</sub> pipeline options.*

*Text describing the new Odessa CO<sub>2</sub> pipeline options has been added to the Final EIS in the Summary (Sections S.4.2.4, Table S-4), Volume I, Chapter 2 (Proposed Action and Alternatives, Sections 2.4.4, 2.4.5) and in Volume II, Chapter 7 (Section 7.1.3, Table 7.1-1).*

*Continuous Monitoring Methods - Public concerns were raised regarding monitoring of the injection of CO<sub>2</sub>. A new subsection titled Continuous Monitoring Methods was added to Section 2.5.2.2, Monitoring, Mitigation, and Verification in the Final EIS that describes various monitoring systems that could be implemented. Such systems could include a Supervisory Control and Data Acquisition (SCADA) system to continuously monitor and transmit flow rate, pressure, and temperature information from the injection wells to a central data collection point; Eddy Covariance tower(s) to measure atmospheric CO<sub>2</sub> concentrations; detectors installed at the wellheads; and the use of micro-tiltmeters and monitoring wells.*

*Noise Monitoring – Commentors stated they had concerns about noise levels related to the operation and construction of the FutureGen Project and increased traffic during construction and*

*operation. DOE collected additional noise monitoring information in June 2007 at each of the four alternative site locations. DOE used the Federal Highway Administration's (FHWA's) Traffic Noise Model, Version 2.5, which considers roadway geometry, vehicle speed, and traffic direction, to predict the increase in noise generated by project-related construction and operation activities. The noise analysis was conducted to evaluate the impacts at mobile source receptors whenever the 3-dBA threshold was exceeded. The results of the noise monitoring conducted in June 2007 are provided in the Summary, Table S-12; Volume I, Chapter 3, Section 3.1.14 and Table 3-3; and in Volume II, Sections 4.14, 5.14, 6.14, and 7.14 of the Final EIS.*

*Potential for Release during Co-Sequestration - Additional model simulations of pipeline ruptures or punctures to represent releases during the co-sequestration experiment were conducted and the results are discussed in the revised Risk Assessment report and the Final EIS in Volume I, Chapter 3, Section 3.1.17.*

*Cumulative Impacts – Air Quality- Comments were received about the inclusion of emission sources in the vicinity of the Jewett Site that would contribute to cumulative impacts to air quality, particularly power plants that are no longer being considered. The following projects were deleted from cumulative air impacts: Big Brown, Lake Creek, and Trading House Units 3 and 4. Text was revised in the Final EIS in the Summary, Section S.10.2, Table S-14; and in Volume I, Chapter 3, Section 3.3.3.2, Table 3-7.*

*Cumulative Impacts - Water Supply – Public concerns were raised about this project causing cumulative impacts to water supply resources at the alternative site locations. Revised text that more fully explains the water supply sources and the potential demand on water supply sources was added to the Final EIS in the Summary, Section S.10.3, and Volume I, Chapter 3, Section 3.3.4.*

*Radionuclides and Radon – DOE received a comment concerning radioactive isotopes in coal. New text was added to Volume II, Chapters 4, 5, 6, and 7 in the air quality sections 4.1, 5.1, 6.1, and 7.1 of the Final EIS that describes the radionuclide in coal, the potential for radionuclide emissions from coal-fired boilers; the fate of radionuclides in a coal combustion power plant; and the proposed use of extremely high particulate control at FutureGen compared to conventional coal plants.*

*Alternative Power Sources – Several commentors questioned why other sources of power such as wind or solar energy were not being considered in place of coal power. The comment-response document in Volume III, Chapter 13, responds to this general comment as follows (no change was made to the EIS):*

*DOE oversees numerous programs that are investigating and supporting a wide variety of renewable energy generation technologies, including wind, solar, and hydro. However, the particular goal of the FutureGen Program is to demonstrate an advanced power generation facility based on fossil fuels, specifically coal. Hence, technologies that would not be based on coal use are not within the scope of the FutureGen Project.*

*Comments and Responses on the Draft EIS – Volume III, Chapter 13 contains copies of all comments that were received by DOE on the Draft EIS. Individual responses to comments are provided in Volume III, Chapter 13.*

*Risk Assessment Report – Additional model simulations of pipeline ruptures or punctures to represent releases during the co-sequestration experiment were conducted, as discussed in the revised Risk Assessment. These results show that the distance where the public could be exposed to H<sub>2</sub>S at levels that could result in adverse effects are significantly greater than for the base case, and thus more people could be exposed, if a release occurred during an experiment. A summary of the risk results for*

*the co-sequestration experiment is found in the Risk Assessment Report, Section 4.5.5. Details on the modeling for the experiment are found in Appendix C, Section C.5, and C.6 of the report.*

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## 2. PROPOSED ACTION AND ALTERNATIVES

### 2.1 INTRODUCTION

This chapter describes in detail the Proposed Action, including alternative sites, the No-Action Alternative, and alternatives eliminated from further consideration. Section 2.2 includes an overview of the FutureGen Project to provide the context for information contained in the alternative site discussions. Additionally, Section 2.5 presents detailed technical information on the proposed FutureGen Project that forms the basis for the analyses in this Environmental Impact Statement (EIS). This information includes detailed descriptions of the proposed power plant, carbon dioxide (CO<sub>2</sub>) capture and sequestration (storage) methods, monitoring activities, planned and potential research activities, resources required for the proposed project, and construction and operation plans. Lastly, future design, site characterization, and National Environmental Policy Act (NEPA) of 1969 activities are described.

### 2.2 DESCRIPTION OF THE PROPOSED ACTION

DOE proposes to provide financial assistance to the Alliance to plan, design, construct, and operate the FutureGen Project. DOE has identified four reasonable alternative sites and will determine which sites, if any, are acceptable to DOE to host the FutureGen Project. The four sites currently being considered as reasonable site alternatives for the FutureGen Project are:

- Mattoon, Illinois;
- Tuscola, Illinois;
- Jewett, Texas; and
- Odessa, Texas.

In a March 2004 Report to Congress, DOE estimated the cost of the project at \$950 million in constant 2004 dollars shared at a 74/26 ratio by DOE and the Alliance. Accounting for escalation, based on representative industry indices, the project is currently estimated to cost \$1,757,232,310 in as-spent dollars. Including \$300,800,000 in expected revenues from the sale of electricity, which would be used to offset operational costs and research and development expenses, the total net project cost is estimated to be \$1,456,432,310 in as-spent dollars. DOE will share approximately 74 percent of the net cost (estimated at \$1,077,760,230), which includes at least \$80 million in projected contributions from foreign governments. The Alliance will share approximately 26 percent of the net cost (estimated at \$378,672,080). The cost estimate will be updated as work progresses.

The FutureGen Project would be a research facility as well as the cleanest coal-fueled power system in the world for co-producing electricity and hydrogen (H<sub>2</sub>). The facility would incorporate cutting-edge research, as well as the development of promising new energy-related technologies at a commercial scale. Low carbon emissions would be achieved by integrating CO<sub>2</sub> capture and sequestration operations with the proposed power plant (see Figure 2-1). Performance and economic test results from the FutureGen Project would be shared among participants, industry, the environmental community, and the public.

Construction would begin in 2009, with initial startup of the facility anticipated in 2012. DOE-sponsored activities would include construction and 4 years of plant operation, testing, and research (including 1 year of startup) (i.e., research and development) followed by 2 years of additional geologic monitoring for the sequestered CO<sub>2</sub> (see Figure 2-2). After DOE-sponsored activities conclude, the Alliance or its successor would manage and operate the power plant. DOE expects the plant would operate for at least 20 to 30 years, and potentially up to 50 years.

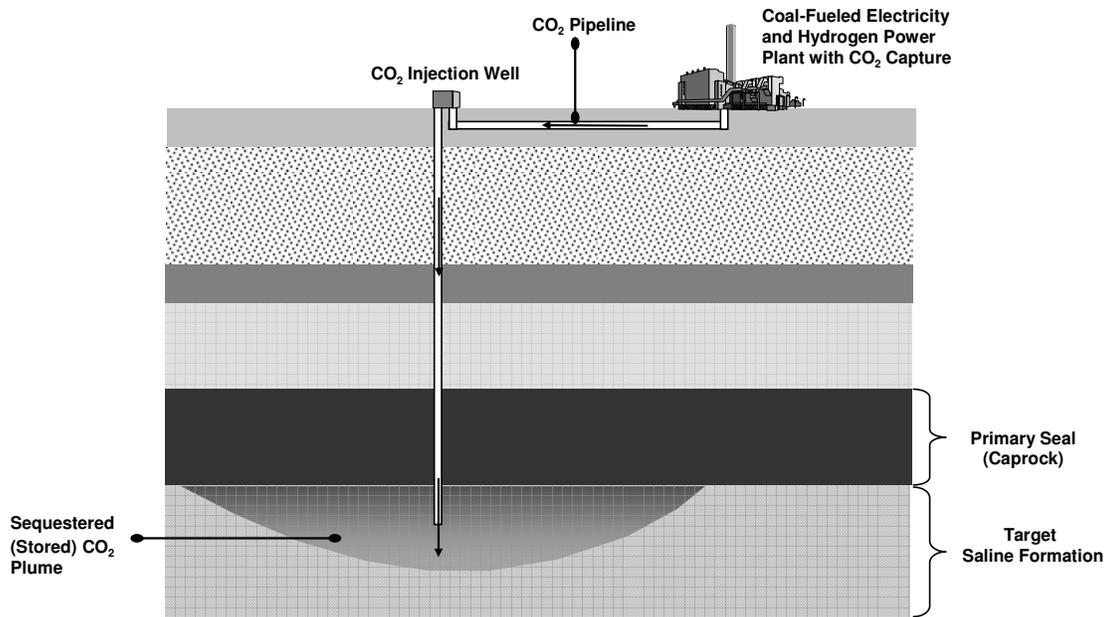


Figure 2-1. FutureGen Project Overview

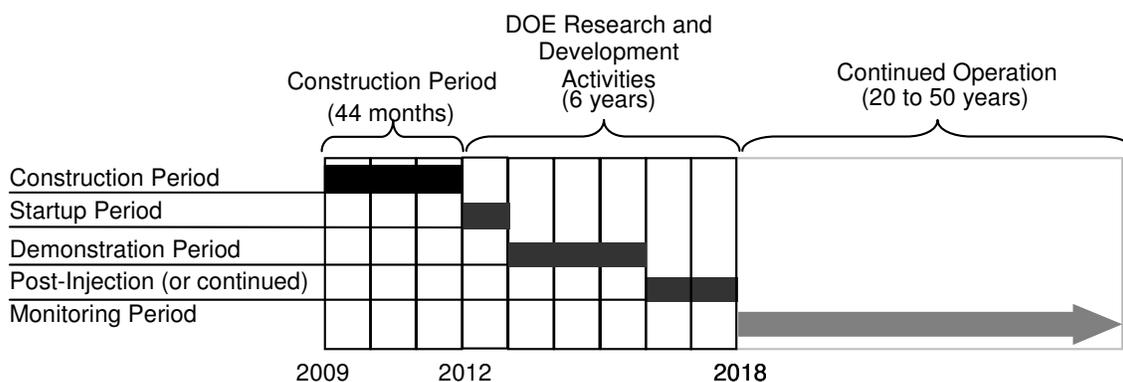


Figure 2-2. Construction, Demonstration, Monitoring, and Operating Schedule

The FutureGen Project would include a coal-fueled electric power and H<sub>2</sub> production plant. The power plant would be a 275-megawatt (MW) output Integrated Gasification Combined Cycle (IGCC) system. CO<sub>2</sub> capture and geologic storage would occur at a rate of at least 1.1 million tons (1 million metric tons [MMT]) of CO<sub>2</sub> per year. Major components needed to support the proposed FutureGen Project include:

- A power plant site and plant infrastructure;
- A sequestration site for CO<sub>2</sub> injection wells related infrastructure, and deep saline formation (i.e., the geologic formation where CO<sub>2</sub> would be stored);
- Utility connections and corridors (e.g., water supply, sanitary wastewater, electric transmission, natural gas pipelines, and CO<sub>2</sub> pipelines); and
- Transportation routes (rail and truck).

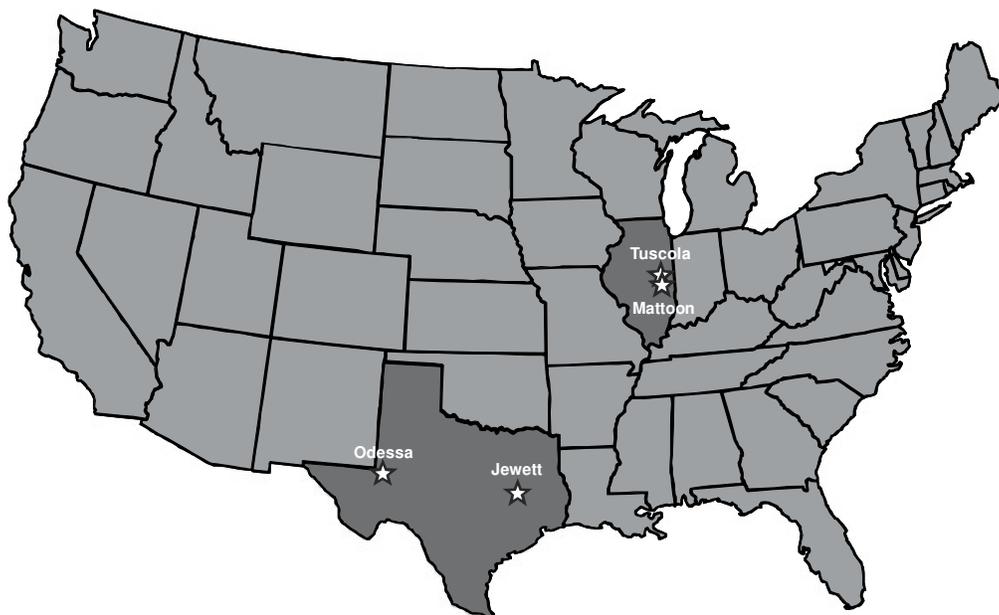
**IGCC** refers to the combination (integration) of the gasification process with a combined-cycle power plant (i.e., a plant that uses both steam turbine and combustion turbine generators).

## 2.3 NO-ACTION ALTERNATIVE

Under the No-Action Alternative, DOE would not share in the cost for constructing and operating the FutureGen Project. Without DOE funding, the Alliance would not likely undertake the commercial-scale integration of CO<sub>2</sub> capture and geologic sequestration with a coal-fueled power plant in a comparable timeframe. Therefore, the No-Action Alternative is considered a “No-Build” Alternative.

## 2.4 SITE ALTERNATIVES

There are four alternative site locations under consideration for the FutureGen Project (see Figure 2-3). These candidate sites were identified by the Alliance through a rigorous screening and selection process. DOE reviewed the Alliance’s decision-making process and findings to ensure that all reasonable alternatives were considered for analysis in this EIS. Alternatives considered but determined to be unreasonable are discussed in Section 2.4.6.



Source: FG Alliance, 2006a

**Figure 2-3. Alternative Site Locations**

### 2.4.1 MATTOON SITE

The proposed Mattoon Site consists of approximately 444 acres (180 hectares) of farmland located approximately 1 mile (1.6 kilometers) northwest of the City of Mattoon, in Coles County, Illinois. Key features of the Mattoon Site are listed in Table 2-1. The proposed power plant and sequestration site would be located on the same parcel of land. The proposed site is bordered to the northeast by State Route (SR) 121 and a Canadian National Railroad. Potable water would be supplied by extending existing lines from Mattoon’s public water supply system. Process water would be provided from the effluent of the municipal wastewater treatment plants (WWTPs) of the cities of Mattoon and possibly Charleston, Illinois. Sanitary wastewater service would be provided through an extension of Mattoon’s public wastewater system. Natural gas would be delivered through a high-pressure line that is within 0.25 mile (0.4 kilometer) of the proposed site. The proposed power plant would connect to the power grid via existing or new high voltage transmission lines. Following Table 2-1, Figures 2-4 and 2-5 illustrate the Mattoon Site and utility corridors, respectively.



**Proposed Mattoon Power Plant and Sequestration Site**

**Table 2-1. Mattoon Site Features**

Feature	Description
<p><b>Power Plant Site</b></p>	<p>The proposed Mattoon Power Plant and Sequestration Site consists of approximately 444 acres (180 hectares) located in Mattoon Township, Coles County, Illinois. The proposed site consists of 93 percent farmland and 3 percent public rights-of-way (ROWs), with the remaining percentage being rural residential development and woodlands.</p> <p>The Site Proponent is a group consisting of the State of Illinois (through the Illinois Department of Commerce and Economic Opportunity), the City of Mattoon, Coles County, and Coles Together (an economic development organization).</p> <p>The proposed site is currently privately owned, but the Site Proponent has an option to purchase the site title, which would be conveyed to the Alliance. The northeast boundary of the proposed site is adjacent to SR 121. Rail access is immediately adjacent to the northeast site boundary. The proposed power plant site is located approximately 1 mile (1.6 kilometers) northwest of Mattoon and approximately 150 miles (241.4 kilometers) south of Chicago. This Coles County site is used as farmland, is flat, and is surrounded by a rural area of low-density population.</p>
<p><b>Sequestration Site Characteristics and Predicted Plume Radius</b></p>	<p>The sequestration site is located on the same parcel of land as the power plant site. CO<sub>2</sub> injection would occur within the Mt. Simon saline-bearing sandstone at a depth of 1.3 to 1.6 miles (2.1 to 2.6 kilometers). The Mt. Simon formation is overlain by a thick (500- to 700-foot [152- to 213-meter]) regional seal of low permeability siltstones and shales of the Eau Claire formation and is underlain by Precambrian granitic rock.</p>

**Table 2-1. Mattoon Site Features**

Feature	Description
<b>Sequestration Site Characteristics and Predicted Plume Radius (continued)</b>	<p>The St. Peter sandstone is proposed as an optional target reservoir. It occurs at a depth of 0.9 mile (1.4 kilometers), which is about 0.4 mile (0.6 kilometer) above the Mt. Simon formation. The St. Peter sandstone is estimated to be over 200 feet (61 meters) thick with state-wide lateral continuity. Both the Mt. Simon and St. Peter reservoirs have been successfully used for natural gas storage in other parts of Illinois.</p> <p>To estimate the size of the plume of injected CO<sub>2</sub>, the Alliance used numerical modeling to predict the plume radius from the injection well. This modeling estimated that the plume radius at Mattoon could be as large as 1.2 miles (1.9 kilometers) after injecting 1.1 million tons (1 MMT) of CO<sub>2</sub> annually for 50 years. The dispersal and movement of the injected CO<sub>2</sub> would be influenced by the geologic properties of the reservoir, and it is unlikely that the plume would radiate in all directions from the injection point in the form of a perfect circle. However, for reference purposes, this modeled radius corresponds to a circular area equal to 2,789 acres (1,129 hectares).</p> <p>Data from a recent two-dimensional (2D) seismic line across the proposed injection site indicated that the continuity of the seismic reflectors on this seismic line suggests that there is no significant faulting cutting the plane on the seismic line within 1.5 miles (2.4 kilometers) to the west and 1.5 miles (2.4 kilometers) to the east of the Mattoon Sequestration Site (Patrick Engineering, 2006).</p>
<b>Utility Corridors</b>	
Potable Water	Potable water would be supplied to the plant site from the Mattoon public potable water system. A 1-mile (1.6-kilometer) pipeline extension would be constructed within the ROW of County Road (CR) 800N from the proposed power plant site to a 10-inch (25-centimeter) potable water pipeline on 43 <sup>rd</sup> Street south of SR 121.
Process Water	<p>The proposed Mattoon Site would obtain process water from the effluent of the municipal WWTPs of Mattoon and possibly Charleston. For the Mattoon WWTP effluent, a 6.2-mile (10.0-kilometer) pipeline would be constructed, with all but 2 miles (3.2 kilometers) within an existing public ROW located within the city boundary. The Site Proponent has option contracts to buy the necessary easements for these 2 miles (3.2 kilometers) of pipeline. The possible addition of a new 8.1-mile (13.0-kilometer) pipeline from the Charleston WWTP would be within an existing ROW owned by Mattoon and Charleston. The jointly-owned ROW follows the Lincoln Prairie Grass Bike Trail, and existing 138-kilovolt (kV) overhead electric lines run the entire length.</p> <p><b><i>Additionally, after issuance of the Draft EIS, a slight modification of the 6.2 mile (10.0 kilometer) process water pipeline was submitted to the Alliance by the Site Proponent (see Sections S.4.3, 2.4.5, 4.1 and Tables S-1, S-12, and 3-3).</i></b></p> <p>An on-site reservoir (on the power plant property) could be constructed to store up to 25 million gallons (94.6 million liters) of process water to satisfy water requirements. A small reservoir of 7 acres (2.8 hectares) would be adequate. If a larger reservoir were constructed (approximately 40 acres [16.2 hectares] in size) with a capacity of 200 million gallons (757 million liters), the Mattoon WWTP effluent would be sufficient by itself to supply the proposed plant's process water.</p>
Sanitary Wastewater	Sanitary wastewater service would be provided to the proposed plant site through an extension of Mattoon's existing public wastewater system. A sanitary sewer lift station would be constructed at the proposed site. A 1.25-mile (2.0-kilometer) wastewater force main would then be constructed in the ROW of SR 121 to an existing sanitary lift station at the intersection of SR 121 and 43 <sup>rd</sup> Street.
Electric Transmission Lines	Option 1: The proposed power plant would connect with an existing 138-kV transmission line located 0.5 mile (0.8 kilometer) from the proposed site. This line runs north-south and is owned by Ameren Corporation. A corridor easement to connect the proposed site to the existing 138-kV line has already been acquired by Mattoon. There are three scenarios to tie into this line under Option 1.

**Table 2-1. Mattoon Site Features**

Feature	Description
Electric Transmission Lines (continued)	<p>Option 1a: Tie directly into the existing 138-kV line with transfer switching.</p> <p>Option 1b: Install a substation at the interconnection of the new easement with the existing ROW.</p> <p>Option 1c: Run a new transmission line south next to the existing 138-kV line and connect with the existing substation less than 2 miles (3.2 kilometers) away near Route 16. The existing substation would need to be upgraded.</p> <p>Option 2: Under this option, the proposed site would be connected to the nearest 345-kV line at the Neoga South Substation located 16 miles (25.7 kilometers) south of the proposed site. This option would require 16 miles (25.7 kilometers) of new line and ROW to connect the proposed plant with this substation.</p>
Natural Gas	A natural gas mainline is located approximately 0.25 mile (0.4 kilometer) east of the proposed power plant site. This is a high-pressure line, and a new tap and delivery station would be required. The Site Proponent has obtained an option for additional land for the pipeline ROW that would give flexibility in the route to connect to this line.
CO <sub>2</sub> Pipeline	The CO <sub>2</sub> injection well for the FutureGen Project at Mattoon would be located at the proposed power plant site. Therefore, no off-site CO <sub>2</sub> pipeline or corridor would be necessary.
<b>Transportation Corridors</b>	<p>The site is located 7 miles (11.3 kilometers) west of Interstate (I) Highway 57 (I-57), along SR 121. The Canadian National-Peoria Subdivision rail line is immediately adjacent to the northeast site boundary. The Canadian National/Illinois Central mainline connects to the Peoria Subdivision rail line approximately 3.5 miles (5.6 kilometers) from the proposed site.</p> <p>Illinois is located within the East North Central Demand Region for coal, which also includes Ohio, Indiana, Wisconsin, and Michigan. According to the Energy Information Administration (EIA, 2000), the East North Central Demand Region is ideally situated for access to coal, which it receives from each of the major U.S. supply regions. In 1997, the average distance that a coal shipment traveled to reach a destination in this region was about 830 miles (1,336 kilometers) (EIA, 2000). In terms of a straight-line distance, Mattoon is approximately 300 miles (483 kilometers) from the Pittsburgh Coalbed (near south-central Ohio in the northern Appalachian Basin), 900 miles (1,448 kilometers) from the Powder River Basin (PRB) (eastern Wyoming), and 50 miles (80.5 kilometers) from the nearest active coal mine within the Illinois Basin (Vermillion County, Illinois).</p>

Source: FG Alliance, 2006b (unless otherwise noted).

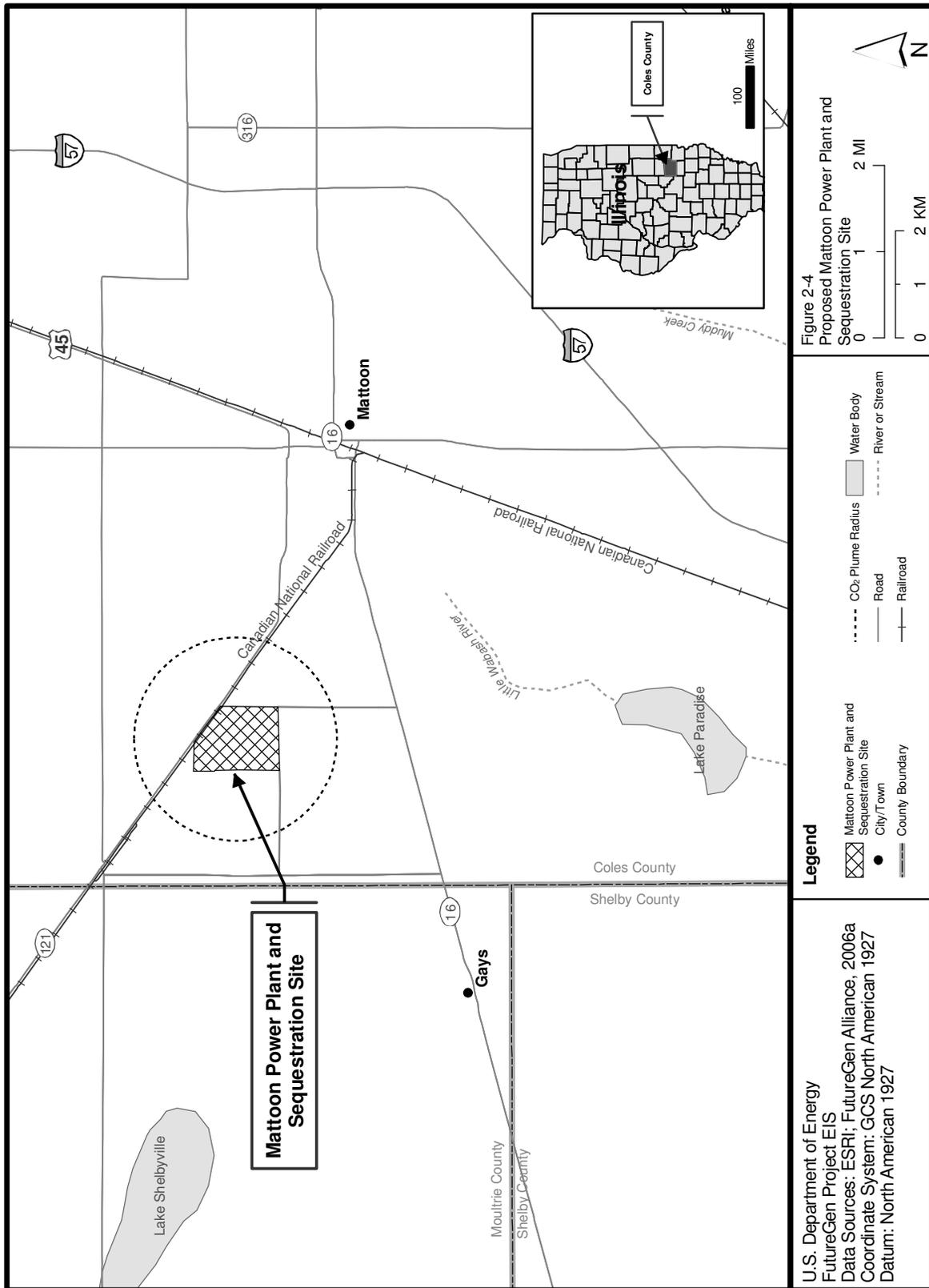
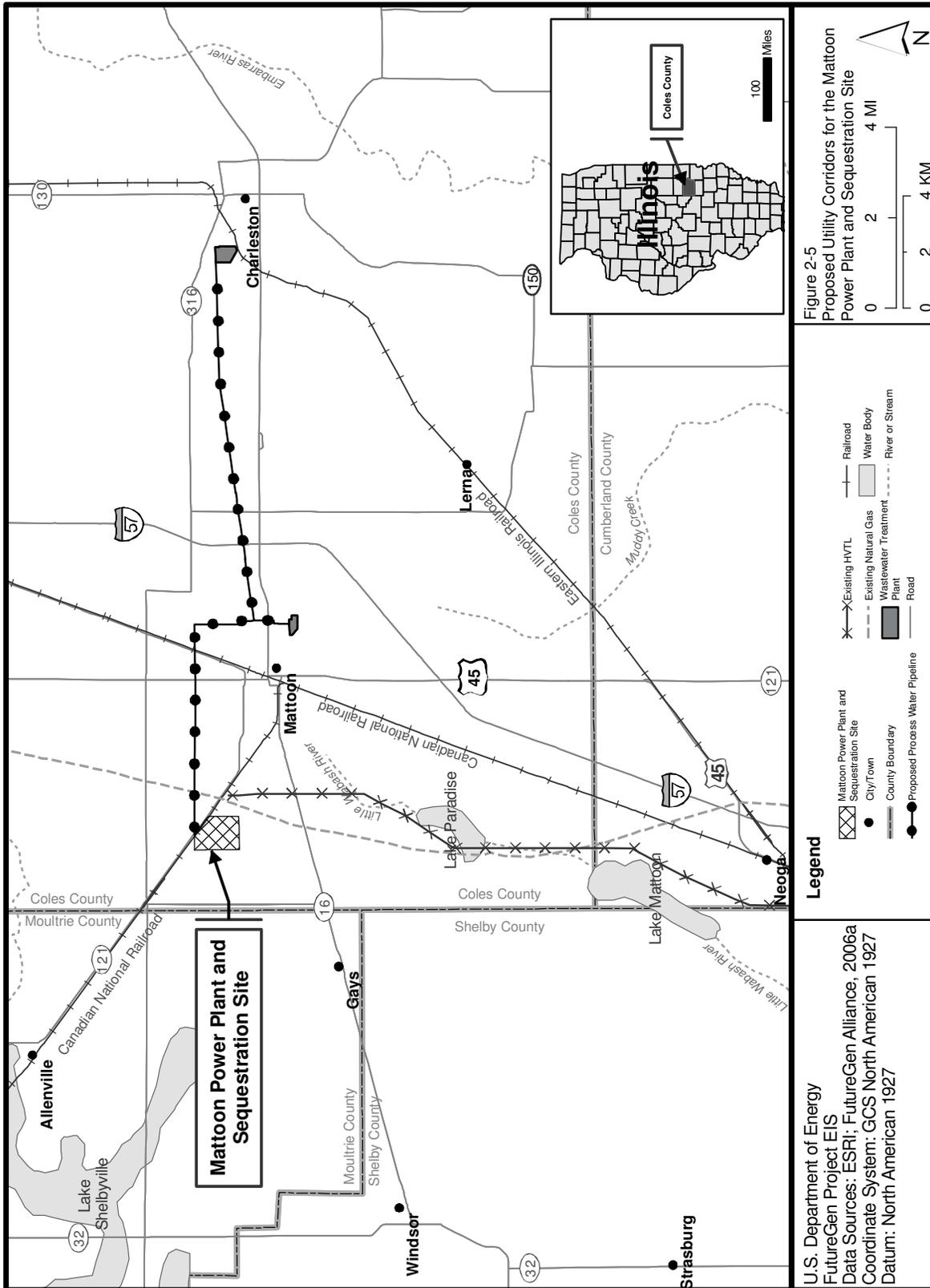


Figure 2-4  
Proposed Mattoon Power Plant and  
Sequestration Site

U.S. Department of Energy  
FutureGen Project EIS  
Data Sources: ESRI; FutureGen Alliance, 2006a  
Coordinate System: GCS North American 1927  
Datum: North American 1927



## 2.4.2 TUSCOLA SITE

The proposed Tuscola Site consists of approximately 345 acres (140 hectares) of farmland located approximately 1.5 miles (2.4 kilometers) west of the City of Tuscola, in Douglas County, Illinois. Key features of the Tuscola Site are listed in Table 2-2. Township Road (TR) 86 (750E) borders the western side of the proposed plant site and TR 47 (1050N) runs along its northern border. A CSX Railroad runs along its southern border. Potable water would be supplied through an existing water line along the southern border of the proposed site. Process water would be pumped from a water holding pond fed by the Kaskaskia River and located at the nearby Lyondell-Equistar Chemical Company. Sanitary wastewater would be treated either through a new on-site WWTP or by constructing a new sanitary force-main to the wastewater treatment system at the Lyondell-Equistar plant. The proposed power plant would connect to the power grid via existing or new high voltage transmission lines. Natural gas would be delivered through an existing line that runs through the proposed plant site. The proposed sequestration site is currently farmland situated 11 miles (17.7 kilometers) directly south of the proposed plant site. A new CO<sub>2</sub> pipeline would be constructed within the existing road and utility ROWs, and new ROWs running parallel to existing ROWs if required. Following Table 2-2, Figures 2-6, 2-7, and 2-8 illustrate the Tuscola Power Plant Site, utility corridors, and sequestration site, respectively.



**Proposed Tuscola Power Plant Site**

**Table 2-2. Tuscola Site Features**

Feature	Description
<p><b>Power Plant Site</b></p>	<p>The proposed Tuscola Site consists of approximately 345 acres (140 hectares) located in east-central Illinois, 1.5 miles (2.4 kilometers) west of the City of Tuscola within Douglas County. TR 86 (750E) runs along the west border of the proposed plant site and TR 47 (1050N) runs along its northern border.</p> <p>The Site Proponent is a group consisting of the State of Illinois (through the Illinois Department of Commerce and Economic Opportunity), the City of Tuscola, Douglas County, and Tuscola Economic Development, Inc.</p> <p>The proposed site is currently privately owned, but the Site Proponent has an option to purchase the site title, which would be conveyed to the Alliance. The proposed site is located on flat farmland near an industrial complex, which is immediately west of the proposed site. The areas to the immediate north, east, and south are rural with a very low population density.</p>
<p><b>Sequestration Site Characteristics and Predicted Plume Radius</b></p>	<p>The proposed sequestration site is located in a rural area, approximately 2 miles (3.2 kilometers) south-southwest of the small town of Arcola in Douglas County in east-central Illinois. The proposed site is located 11 miles (17.7 kilometers) south of the proposed power plant site and is 3 miles (4.8 kilometers) west of I-57.</p> <p>The proposed sequestration site would be located on a land trust, where the trustee is the First National Bank of Arcola. The trustee has been authorized by the beneficiaries of the trust to sell the property. The proposed site is a 10-acre (4-hectare) portion of a larger parcel of 80 acres (32.4 hectares). The proposed sequestration site is located in Arcola Township, Douglas County, approximately 0.25 mile (0.4 kilometer) east of CR 750E along 000N, the Douglas-Coles County line. The site consists primarily of agricultural land with row crops.</p>

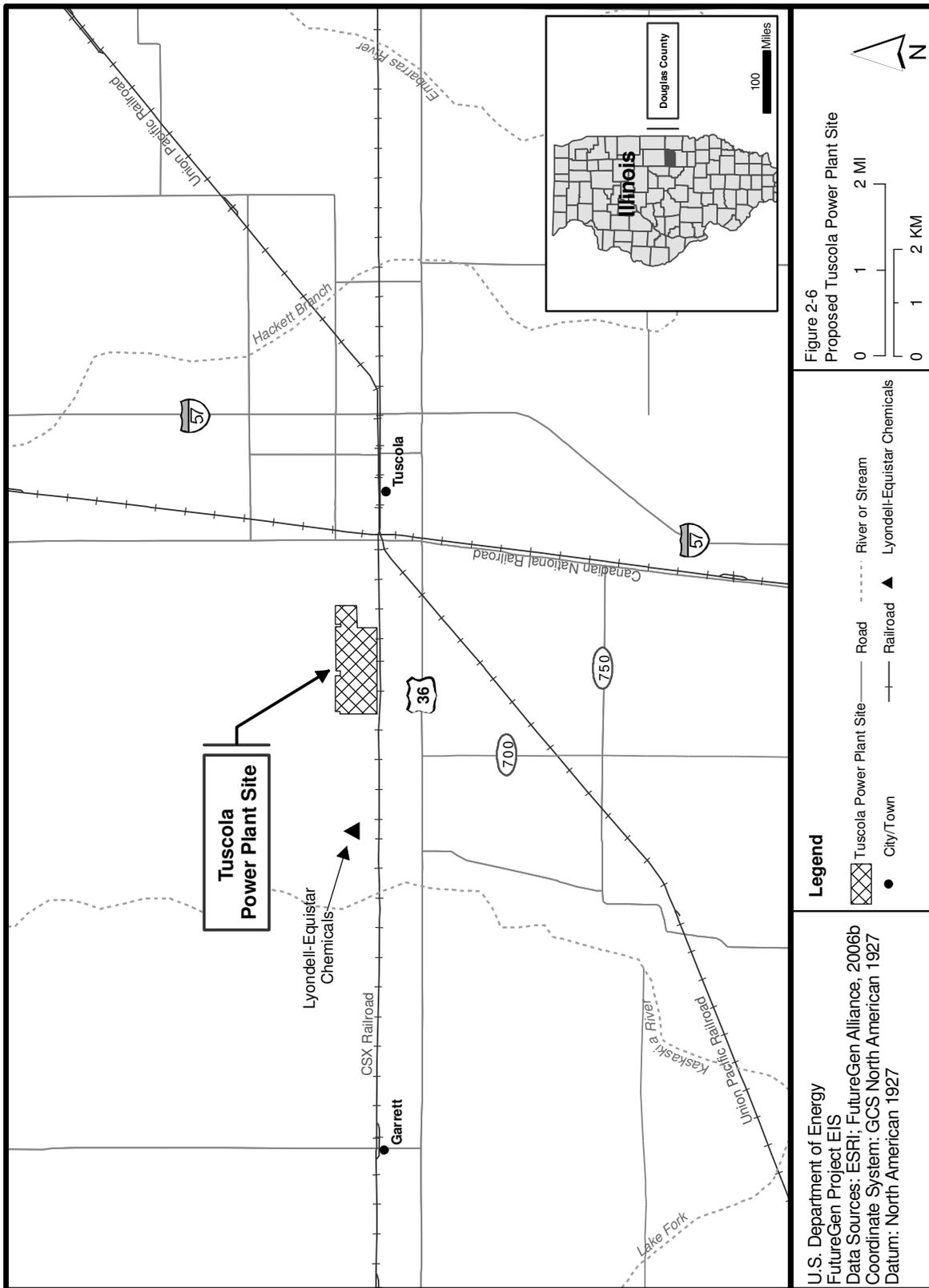
**Table 2-2. Tuscola Site Features**

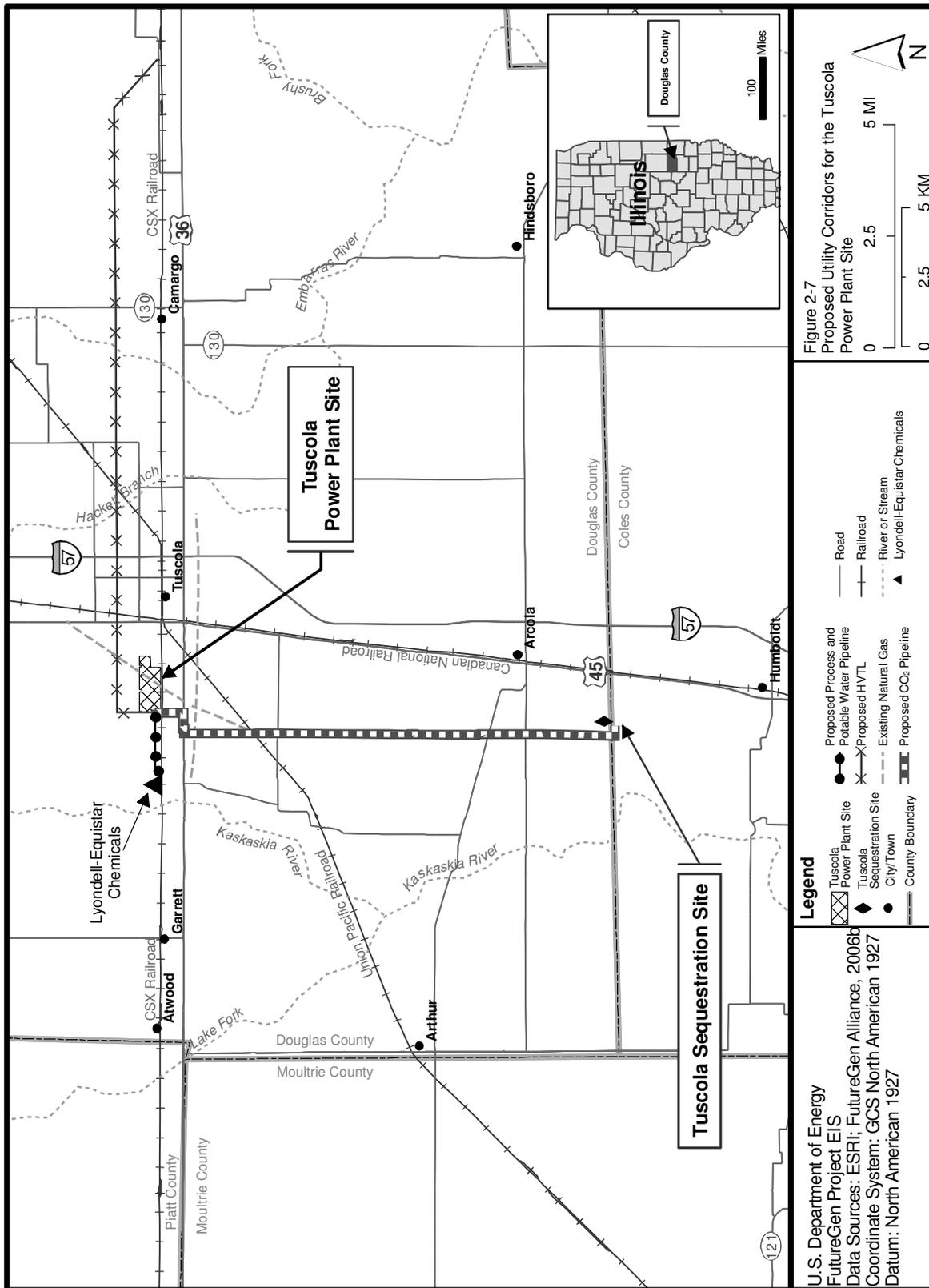
Feature	Description
<b>Sequestration Site Characteristics and Predicted Plume Radius (continued)</b>	<p>Injection would occur within the Mt. Simon saline-bearing sandstone, at a depth of between 1.3 to 1.5 miles (2.1 to 2.4 kilometers). The Mt. Simon formation is overlain by a thick (500- to 700-foot [152- to 213-meter]) regional seal of low permeability siltstones and shales of the Eau Claire Formation and is underlain by Precambrian granitic rock.</p> <p>The St. Peter sandstone is proposed as an optional target reservoir. It occurs at a depth of 0.9 mile (1.4 kilometers), which is about 0.4 mile (0.6 kilometer) above the Mt. Simon formation. The St. Peter reservoir is estimated to be over 100 feet (30.5 meters) thick with state-wide lateral continuity. Both the Mt. Simon and St. Peter reservoirs have been successfully used for natural gas storage in other parts of Illinois.</p> <p>To estimate the size of the plume of injected CO<sub>2</sub>, the Alliance used numerical modeling to predict the plume radius from the injection well. This modeling estimated that the plume radius at the proposed Tuscola injection site could be as large as 1.1 miles (1.8 kilometers) after injecting 1.1 million tons (1 MMT) of CO<sub>2</sub> annually for 50 years. The dispersal and movement of the injected CO<sub>2</sub> would be influenced by the geologic properties of the reservoir, and it is unlikely the plume would radiate in all directions from the injection point in the form of a perfect circle. However, for reference purposes, this modeled radius corresponds to a circular area equal to 2,432 acres (984 hectares).</p> <p>A recent 2D seismic line across the proposed injection site indicated that the continuity of seismic reflectors on this seismic line suggest that there is no significant faulting cutting the plane of the seismic line within 1 mile (1.6 kilometers) to the west and 2.5 miles (4.0 kilometers) to the east of the Tuscola Sequestration Site (Patrick Engineering, 2006).</p>
<b>Utility Corridors</b>	
Potable Water	Potable water would be supplied to the proposed power plant by tapping an existing 8-inch (20.3-centimeter) water line operated by the Illinois American Water Company. This line runs along the southern boundary of the property along the CSX Railroad. Tapping into the existing water line would require less than 1 mile (1.6 kilometers) of new construction.
Process Water	The proposed power plant would receive its process water from an existing 150 million-gallon (568 million-liter) water holding pond at the Lyondell-Equistar Chemical Company located west of the proposed site. This pond contains raw water pumped from the adjacent Kaskaskia River. A 1.5-mile (2.4-kilometer) force main would be constructed to pump water from the pond to the plant, crossing property owned by Lyondell-Equistar Chemical Company and Cabot Corporation, as well as an existing township ROW.
Sanitary Wastewater	<p>Option 1: Under Option 1, an on-site WWTP would be constructed at the proposed plant site. The treated effluent from this facility could then be discharged into an on-site reservoir (if constructed) and then reused as process water.</p> <p>Option 2: Under Option 2, a 0.9-mile (1.4-kilometer) sanitary force-main would be constructed to the existing wastewater treatment system at the Lyondell-Equistar Chemical Company. Once treated, this effluent could potentially be discharged into the existing 150 million-gallon (568 million-liter) reservoir to be reused as process water for the proposed power plant. There is an abandoned 8-inch (20.3-centimeter) potable water pipeline at the property that could potentially be used as a sanitary force-main to the Lyondell-Equistar WWTP. This line would require hydraulic testing before it could be put into service.</p>
Electric Transmission Lines	Option 1: The nearest electric transmission line to the proposed power plant site is a 138-kV line located 0.5 mile (0.8 kilometer) north of the proposed site. This line is owned and operated by Ameren Corporation. The connection to this line would require additional ROW. Under Option 1, the proposed plant would tie into this existing 138-kV line.

**Table 2-2. Tuscola Site Features**

Feature	Description
Electric Transmission Lines (continued)	Option 2: If the interconnection of the proposed plant to the electric grid required use of a 345-kV line, a new 345-kV line that would parallel or replace the existing 138-kV line would be constructed for approximately 17 miles (27.4 kilometers) and connect to a substation where the line currently joins the 345-kV Sidney-Kansas line. Approximately 3 miles (4.8 kilometers) of new ROW would be required. An interconnection study has been requested and would dictate the ultimate line requirements.
Natural Gas	Natural gas would be delivered to the proposed plant from an existing natural gas mainline that runs through the proposed power plant site. Because the pipeline is a high-pressure line, a new tap and delivery station would be required.
CO <sub>2</sub> Pipeline	A new 11-mile (17.7-kilometer) pipeline would be constructed to transport CO <sub>2</sub> to the proposed sequestration site 10 miles (16.1 kilometers) due south of the proposed plant site. The pipeline would be constructed across existing State of Illinois, Douglas County, and Township ROWs and would occupy new ROWs where needed. The pipeline corridor would run parallel to CR 750E and 700E to the injection location.
<b>Transportation Corridors</b>	<p>There are four railroads nearby: CSX Transportation borders site, Union Pacific (1.5 miles [2.4 kilometers]), Canadian National (1.5 miles [2.4 kilometers]), and Norfolk Southern (approximately 30 miles [48.3 kilometers]). The proposed site is bordered by TR 86 and TR 47.</p> <p>Illinois is located within the East North Central Demand Region for coal, which also includes Ohio, Indiana, Wisconsin, and Michigan. According to the Energy Information Administration (EIA, 2000), the East North Central Demand Region is ideally situated for access to coal, which it receives from each of the major U.S. supply regions. In 1997, the average distance that a coal shipment traveled to reach a destination in this region was about 830 miles (1,336 kilometers) (EIA, 2000). In terms of a straight line distance, Tuscola is approximately 300 miles (483 kilometers) from the Pittsburgh Coalbed (near south-central Ohio in the northern Appalachian Basin), 900 miles (1,448 kilometers) from the PRB (eastern Wyoming), and within 35 miles (56.3 kilometers) of the nearest active coal mines in the Illinois Basin (Vermillion County, Illinois).</p>

Source: FG Alliance, 2006c (unless otherwise noted).





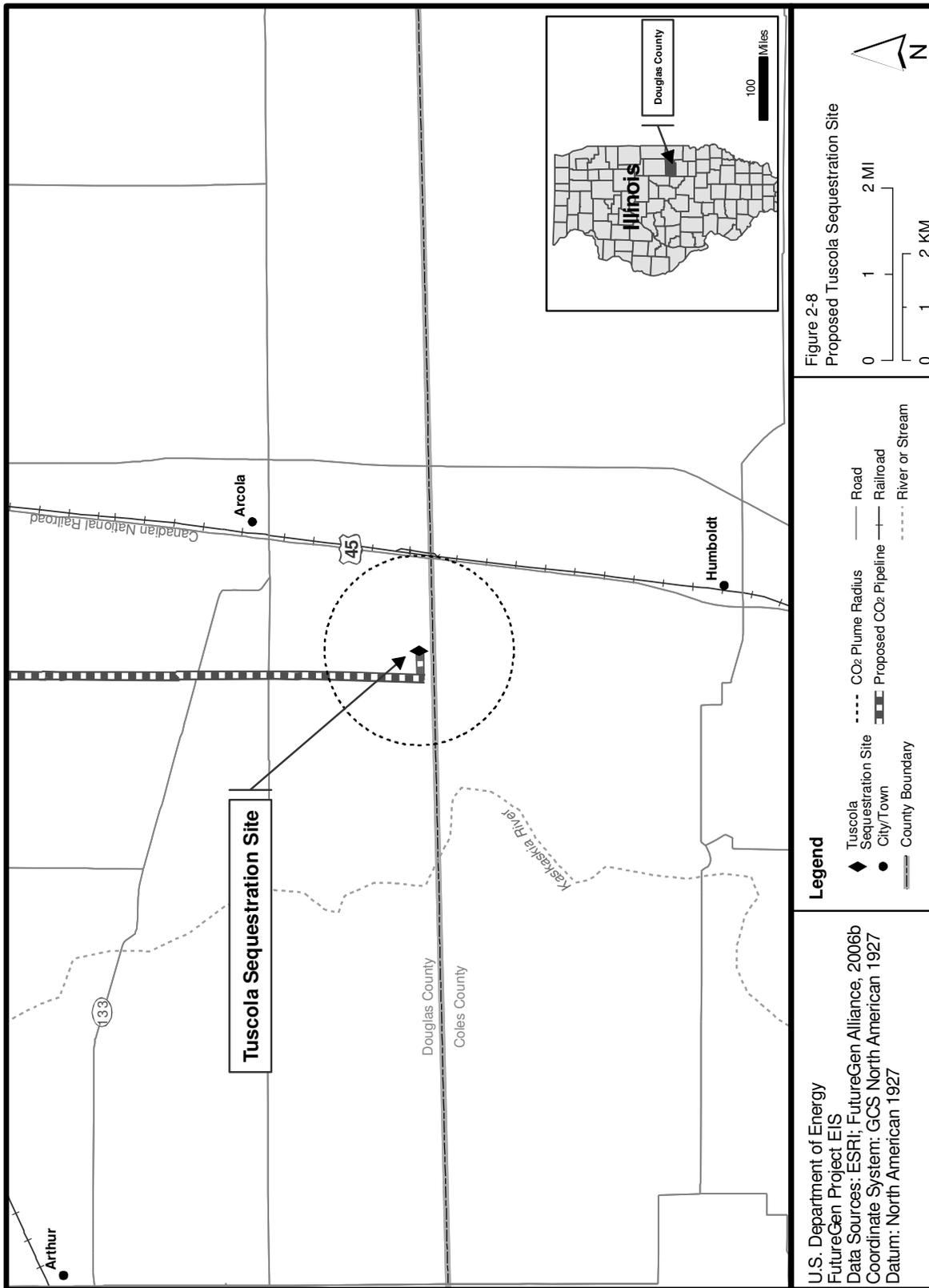


Figure 2-8  
Proposed Tuscola Sequestration Site

- Legend**
- ◆ Tuscola Sequestration Site
  - City/Town
  - County Boundary
  - CO<sub>2</sub> Plume Radius
  - ▨ Proposed CO<sub>2</sub> Pipeline
  - Road
  - Railroad
  - River or Stream

U.S. Department of Energy  
FutureGen Project EIS  
Data Sources: ESR; FutureGen Alliance, 2006b  
Coordinate System: GCS North American 1927  
Datum: North American 1927

### 2.4.3 JEWETT SITE

The proposed Jewett Site is located in east-central Texas on approximately 400 acres (162 hectares) of formerly mined land northwest of the Town of Jewett. Key features of the Jewett Site are listed in Table 2-3. The proposed site is located at the intersection of Leon, Limestone, and Freestone counties, and bordered by Farm-to-Market Road (FM) 39. The Burlington Northern Santa Fe Railroad runs along the northeastern border of the proposed site. Potable water and process water would be obtained by drilling new wells on site or nearby. Sanitary wastewater would be treated through a new on-site wastewater treatment system. The proposed power plant would connect to the power grid via existing high voltage transmission lines. Natural gas would be delivered through an existing gas pipeline located at the northeastern corner of the proposed plant site. The proposed sequestration injection wells would be located on both private ranchland and state-owned prison land approximately 33 miles (53.1 kilometers) northeast of the proposed power plant site. A new CO<sub>2</sub> pipeline would be installed largely along existing ROWs, but would require some new ROWs. Following Table 2-3, Figures 2-9, 2-10, and 2-11 illustrate the Jewett Power Plant Site, utility corridors, and sequestration site, respectively.



**Proposed Jewett Power Plant Site**  
(NRG Limestone Generating Station in the background)

**Table 2-3. Jewett Site Features**

Feature	Description
<b>Power Plant Site</b>	<p>The proposed Jewett Site is located in east-central Texas on approximately 400 acres (162 hectares) of land northwest of the Town of Jewett. The proposed site is located at the intersection of Leon, Limestone, and Freestone counties on FM 39 near US 79. The area is characterized by very gently rolling reclaimed mine lands immediately adjacent to an operating lignite mine and the nominal 1800-MW NRG Limestone Generating Station (power plant).</p> <p>The Site Proponent is the State of Texas. The proposed power plant site is currently held by one property owner – NRG Texas.</p>
<b>Sequestration Site Characteristics and Predicted Plume Radius</b>	<p><i>The proposed Jewett Sequestration Site includes three proposed injection wells located in a rural area about 33 miles (53 kilometers) northeast of the proposed power plant site. Two of the proposed injection well sites are located about 16 miles (28 kilometers) east of the Town of Fairfield in Freestone County, about 60 miles east of Waco. The third proposed injection well site is about 5 miles (8 kilometers) east on Texas Department of Criminal Justice (TDCJ) property in Anderson County about 16 miles (28 kilometers) west of the City of Palestine.</i></p> <p>The land use at the proposed sequestration site is primarily agricultural, with few residences located over the projected plume. Injection would occur on a private ranch (Hill Ranch) and on adjoining state property managed by the TDCJ.</p> <p>Two injection wells are proposed for injection into the Woodbine formation. In addition, one more injection well is proposed for injection into the deeper Travis Peak formation at a much lower injection rate than the primary Woodbine wells to take advantage of CO<sub>2</sub> sequestration research opportunities on low permeability reservoirs. The Travis Peak well would not be required in addition to the Woodbine injection wells to accommodate the output of the proposed power plant. One of the Woodbine injection wells and the Travis Peak well would be located on the Hill Ranch property. The other Woodbine injection well would be located</p>

**Table 2-3. Jewett Site Features**

Feature	Description
<b>Sequestration Site Characteristics and Predicted Plume Radius (continued)</b>	<p>on TDCJ property. Under the proposed injection plan, each of the Woodbine wells would be used to inject 45 percent of the total CO<sub>2</sub> output with the remaining 10 percent injected into the Travis Peak well.</p> <p>Both the Woodbine and Travis Peak formations lie beneath a primary seal, the Eagle Ford Shale, which has a thickness of 400 feet (122 meters). The primary injection zone, the Woodbine sandstone, is directly beneath the Eagle Ford. There are also over 0.4 mile (0.6 kilometer) of low permeability carbonates and shales above the Eagle Ford that create additional protection for shallow <i>underground sources of drinking water</i>. The injection depth within the Woodbine formation would be 1 to 1.1 miles (1.6 to 1.8 kilometers). Injection into the Travis Peak formation would occur between 1.7 to 2.1 miles (2.7 to 3.4 kilometers) below the ground surface.</p> <p>To estimate the size of the plume of injected CO<sub>2</sub>, the Alliance used numerical modeling to predict the plume radius from the injection wells. This modeling estimated that the plume radius at the proposed Jewett injection site could be as large as 1.7 miles (2.7 kilometers) per Woodbine injection well, 50 years after injecting 2.8 million tons (2.5 MMT) of CO<sub>2</sub> annually for the first 20 years, followed by 30 years of gradual plume spreading. The dispersal and movement of the injected CO<sub>2</sub> would be influenced by the geologic properties of the reservoir, and it is unlikely that the plume would radiate in all directions from the injection point in the form of a perfect circle. However, for reference purposes, this modeled radius corresponds to a circular area equal to 5,484 acres (2,219 hectares). A total of 10,968 acres (4,439 hectares) is estimated for all three wells.</p>
<b>Utility Corridors</b>	
Potable Water	Potable water would be supplied in the same manner as the proposed plant's process water, by installing new wells either on the property or off site. This would require 1 mile (1.6 kilometers) of new construction.
Process Water	Process water would be provided by installing wells on the proposed site or possibly off site into the Carrizo-Wilcox Aquifer. Because the wells would be located on or close to the proposed plant site, only a small length of distribution pipeline, less than 1 mile (1.6 kilometers), would be required to deliver water to the proposed plant.
Sanitary Wastewater	Sanitary wastewater would be treated and disposed of through construction and operation of an on-site sanitary WWTP. Effluent from the WWTP would be treated and disposed of in accordance with local and state regulations or recycled back into the power plant for process water.
Electric Transmission Lines	<p>Option 1: The proposed power plant would connect to a 345-kV transmission line bordering the plant site.</p> <p>Option 2: The proposed power plant would connect to a 138-kV line approximately 2 miles (3.2 kilometers) from the site on a new ROW.</p>
Natural Gas	Natural gas would be delivered through an existing natural gas pipeline located at the northwestern corner of the proposed power plant site. This pipeline is owned and operated by Energy Transfer Corporation.
CO <sub>2</sub> Pipeline	<p>A new CO<sub>2</sub> pipeline would be required to connect the proposed power plant site to the proposed sequestration site. The pipeline would be up to 59 miles (95 kilometers) in length and the ROW would be approximately 20 to 30 feet (6.1 to 9.1 meters) wide. The proposed CO<sub>2</sub> pipeline has been divided into the following common segments, except for segments A-C and B-C, which are alternatives between the proposed plant site and the beginning of segment C:</p> <ul style="list-style-type: none"> <li>Segment A-C would begin on the northeastern side of the proposed plant site and follow 2 miles (3.2 kilometers) of existing ROW owned by the Burlington Northern – Santa Fe Railroad. It would continue approximately 3 miles (4.8 kilometers) along a new ROW until it intersects a section of a natural gas pipeline ROW. The corridor would then follow this pipeline another 3 miles (4.8 kilometers) east until it joins a larger trunk of a natural gas pipeline.</li> </ul>

**Table 2-3. Jewett Site Features**

Feature	Description
CO <sub>2</sub> Pipeline (continued)	<ul style="list-style-type: none"> <li>• Segment B-C would begin along the southern boundary of the proposed plant site and extend southeast approximately 2.5 miles (4.0 kilometers) along FM 39. It then would turn northeast and follow the existing ROW of a natural gas pipeline for another 4 miles (6.4 kilometers) until it joins a ROW for a larger trunk of a natural gas pipeline that extends northwest for approximately 8 miles (12.9 kilometers).</li> <li>• Segment C-D would follow an existing natural gas line ROW northward for approximately 15 miles (24.1 kilometers).</li> <li>• Segment D-E is no longer being evaluated for this project; therefore, it is not addressed in this EIS.</li> <li>• Segment D-F would continue northward along the existing natural gas line ROW for another 9 miles (14.5 kilometers).</li> <li>• Segment F-G would extend in a straight line east along a new ROW approximately 6 miles (9.7 kilometers) to the proposed sequestration wells on the Hill Ranch.</li> <li>• Segment F-H would continue northward along the existing natural gas line corridor for almost 2 miles (3.2 kilometers) where it would cross the Trinity River to the north side. It then would intersect another leg of a natural gas pipeline ROW and continue east for approximately 6 miles (9.7 kilometers). The line would then continue in a generally eastward direction along a county highway (CH) ROW and TDCJ land for approximately another 6 miles (9.7 kilometers) to the proposed injection well site on TDCJ land.</li> </ul>
<b>Transportation Corridors</b>	<p>The proposed Jewett Site is bordered by FM 39, which intersects US 79 and State Highway (SH) 164 within 10 miles (16.1 kilometers) of the site boundary. The Burlington Northern – Santa Fe Railroad also runs along the northeastern border of the proposed power plant site.</p> <p>Texas is located in the West South Central Demand Region for coal, which also includes Louisiana, Arkansas, and Oklahoma. According to the Energy Information Administration (EIA, 2000), the West South Central Demand Region receives the majority of its coal resources from the PRB and the Rockies. In 1997, the average distance that a coal shipment traveled to reach a destination in this region was about 1,300 miles (2,092 kilometers) (EIA, 2000). In terms of a straight line distance, Jewett is approximately 950 miles (1,529 kilometers) from the Pittsburgh Coalbed (south-central Ohio in the northern Appalachian Basin), 650 miles (1,046 kilometers) from the Illinois Basin coals (southern Illinois), and 1,000 miles (1,609 kilometers) from the PRB coal supplies (eastern Wyoming). In addition, Texas lignite is available from the on-site Westmoreland Coal Company mine and perhaps other regional mines.</p>

Source: FG Alliance, 2006e (unless otherwise noted).

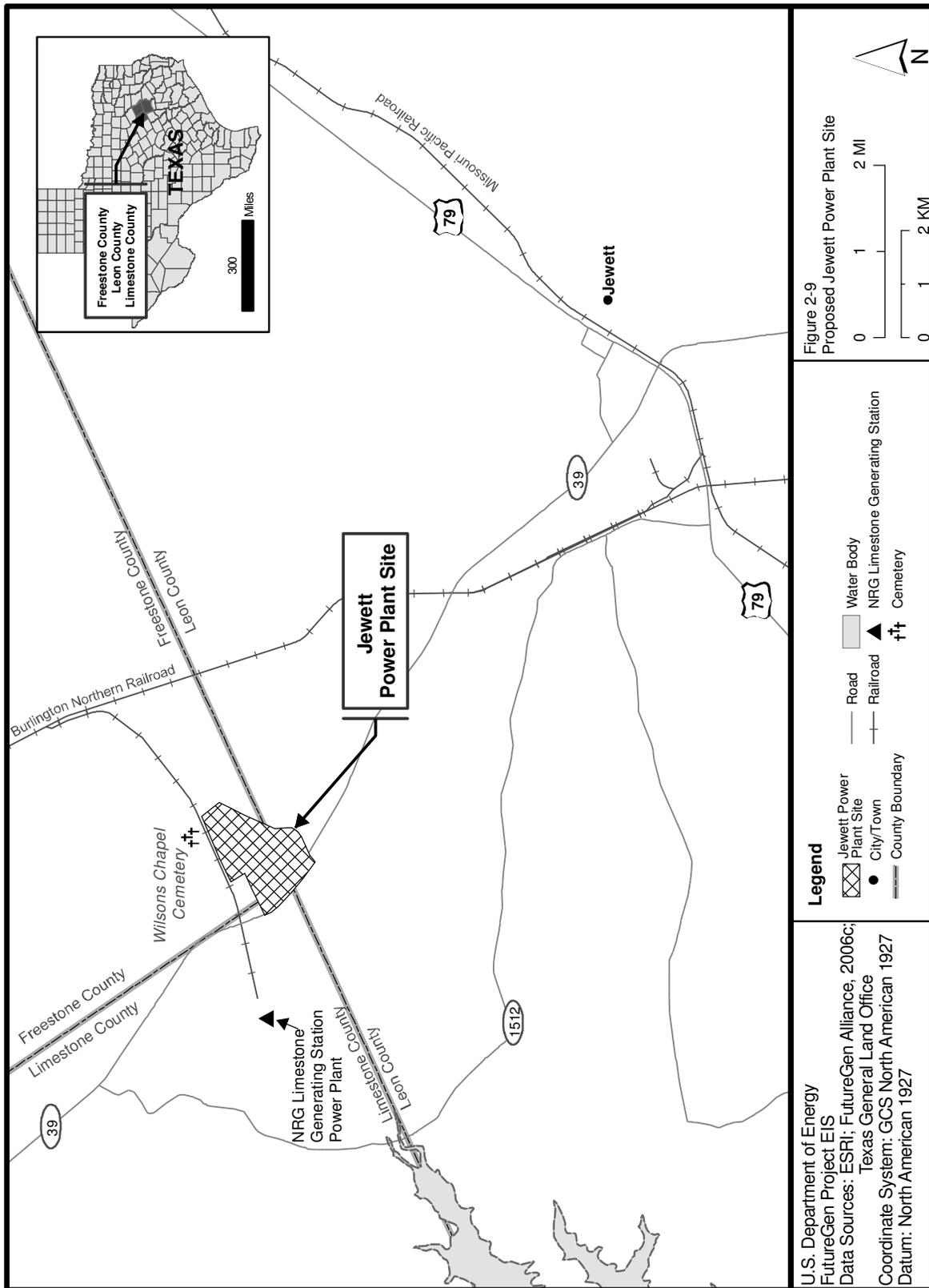
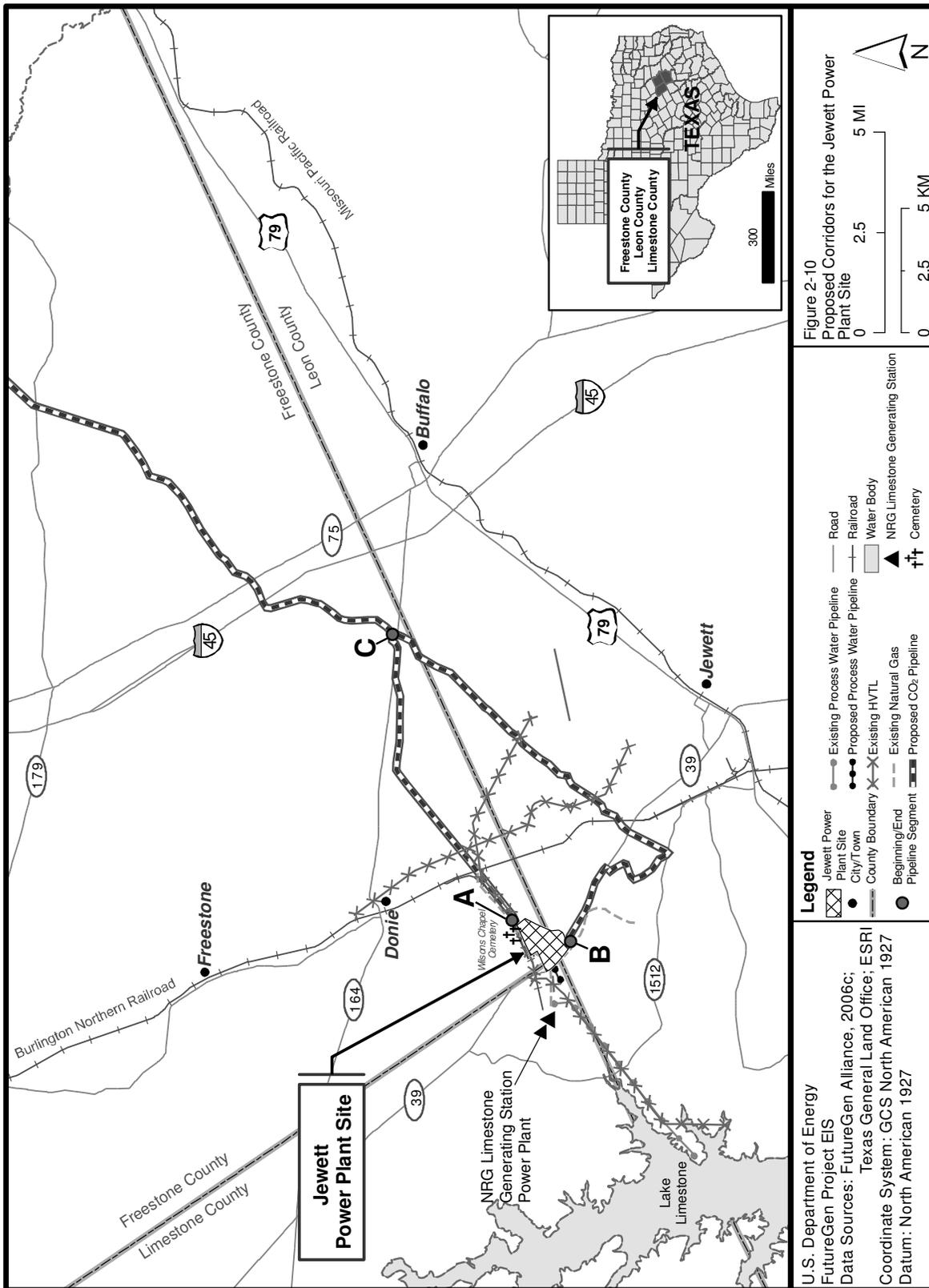


Figure 2-9  
Proposed Jewett Power Plant Site

U.S. Department of Energy  
FutureGen Project EIS  
Data Sources: ESRI; FutureGen Alliance, 2006c;  
Texas General Land Office  
Coordinate System: GCS North American 1927  
Datum: North American 1927



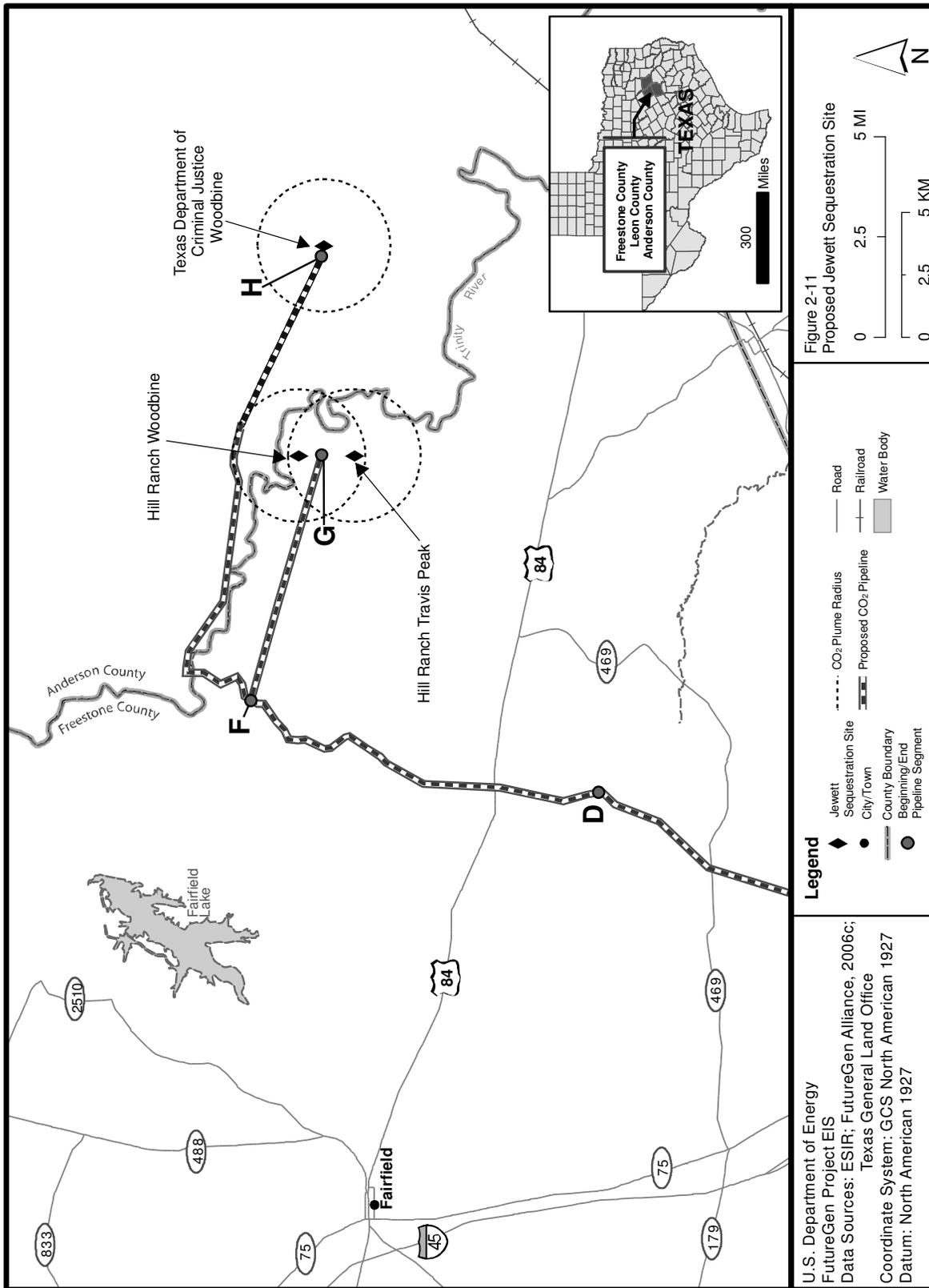


Figure 2-11  
Proposed Jewett Sequestration Site

U.S. Department of Energy  
FutureGen Project EIS  
Data Sources: ESIR; FutureGen Alliance, 2006c;  
Texas General Land Office  
Coordinate System: GCS North American 1927  
Datum: North American 1927

### 2.4.4 ODESSA SITE

The proposed Odessa Site is located on approximately 600 acres (243 hectares) 15 miles (24.1 kilometers) southwest of the City of Odessa in Ector County, Texas. Key features of the Odessa Site are listed in Table 2-4. The proposed site is located just north of I-20 and is north of the Town of Penwell and a Union Pacific Railroad. The land has historically been used for ranching as well as oil and gas activities. Potable water and process water would be obtained by developing new well fields nearby or from several existing water well fields ranging from 24 to 54 miles (38.6 to 86.9 kilometers) from the proposed plant site *or possibly from the Colorado*



**Proposed Odessa Power Plant Site**

*River Municipal Water District (CRMWD) (see Sections S.4.3 and 2.4.5).* Sanitary wastewater would be treated through construction and operation of an on-site treatment system. The proposed power plant would connect to the power grid via existing high voltage transmission lines located approximately 1.8 miles (2.9 kilometers) from the site. Natural gas would be obtained from an existing gas pipeline that traverses the proposed plant site.

The proposed sequestration site would be located 58 miles (93.3 kilometers) south of the proposed power plant site on **42,300** acres (17,118 hectares) on University of Texas land. An existing CO<sub>2</sub> pipeline would transport the power plant's CO<sub>2</sub> to the sequestration site, although up to 14 miles (22.5 kilometers) of new CO<sub>2</sub> pipeline would be installed to connect the proposed power plant and the proposed sequestration site to the existing pipeline. *Additionally, after issuance of the Draft EIS, two additional and reasonable CO<sub>2</sub> pipeline options were submitted to DOE (see Sections S.4.3 and 2.4.5). Option 1 would involve the construction and operation of a new, approximately 90-mile (145-kilometer) pipeline along existing ROWs; and Option 2 which would involve the use of existing pipeline and the construction of a new, approximately 30-mile (48-kilometer) pipeline and a separate sulfur removal plant.* Following Table 2-4, Figures 2-12, 2-13, and 2-14 illustrate the Odessa Power Plant Site, utility corridors, and sequestration site, respectively.

**Table 2-4. Odessa Site Features**

Feature	Description
<b>Power Plant Site</b>	<p>The proposed Odessa Site is located on about 600 acres (243 hectares) approximately 15 miles (24.1 kilometers) southwest of the City of Odessa in Ector County, Texas. The proposed site consists of flat land near I-20 and across the Union Pacific Railroad from the Town of Penwell. The Site Proponent is the State of Texas.</p> <p>Both the proposed site and surrounding land to the east, west, and north are rural areas where land use has been dominated historically by ranching and oil and gas activities (Horizon Environmental Services, 2006). Unimproved roads and structures related to oil and gas well activities are found on and around the proposed site, with most oil production activities historically occurring immediately west of the proposed site. Several pipelines also traverse the proposed site boundaries. The entire property within the proposed power plant site boundary is owned by a single owner.</p>

Table 2-4. Odessa Site Features

Feature	Description
<b>Sequestration Site Characteristics and Predicted Plume Radius</b>	<p>The proposed sequestration site is located in a semi-arid, sparsely populated area adjacent to I-10 in Pecos County, Texas. The proposed site, owned by the University of Texas, is located 58 miles (93.3 kilometers) south of the proposed power plant near Odessa, Texas, and is about 60 miles (96.6 kilometers) south of the Midland-Odessa International Airport. <b><i>The proposed injection site would be approximately 13 miles (21 kilometers) east of Fort Stockton, Texas.</i></b></p> <p><b><i>Proposed injection targets for this site include a lower interval (the Delaware Mountain Group sandstones) and an upper interval (the lower part of Queen formation sandstones).</i></b> The injection target would be at a depth of between 0.4 mile to 1 mile (0.6 to 1.6 kilometers). These sandstone intervals are separated by an intermediate seal that consists primarily of non-porous and impermeable carbonates of the Goat Seep Limestone. The upper injection horizon is overlain by a 700-foot (213-meter) thick primary seal, the Queen-Seven Rivers formation.</p> <p>To estimate the size of the plume of injected CO<sub>2</sub>, the Alliance used numerical modeling to predict the plume radius from the proposed injection wells. This modeling estimated that the plume radius at the proposed Odessa injection site could be as large as 1 mile (1.6 kilometers) per well after injecting 1.1 million tons (1 MMT) of CO<sub>2</sub> annually for 50 years. The dispersal and movement of the injected CO<sub>2</sub> would be influenced by the geologic properties of the reservoir and it is unlikely the plume would radiate in all directions from the injection point in the form of a perfect circle. However, for reference purposes, this modeled radius corresponds to a circular area equal to 2,136 acres (864 hectares). A minimum of three wells would be required to support a constant 1.1 million tons (1 MMT) per year injection rate. A minimum of eight wells would be needed to support a 2.8 million tons (2.5 MMT) per year injection rate. Assuming a total of 55 million tons (50 MMT) of CO<sub>2</sub> is injected, the total plume area would be 6,980 acres (2,825 hectares) assuming eight wells would be required to inject 2.8 million tons (2.5 MMT) per year for the first 20 years of a 50-year time period. A slightly smaller area (6,073 acres [2,458 hectares]) would be required if only three wells were needed to inject 1.1 million tons (1 MMT) per year for each year in a 50-year time period. <b><i>The sequestration site contains an estimated 42,300 acres (17,118 hectares) of land.</i></b></p>
<b>Utility Corridors</b>	
Potable Water	Potable water would potentially be obtained through the same sources identified for process water.

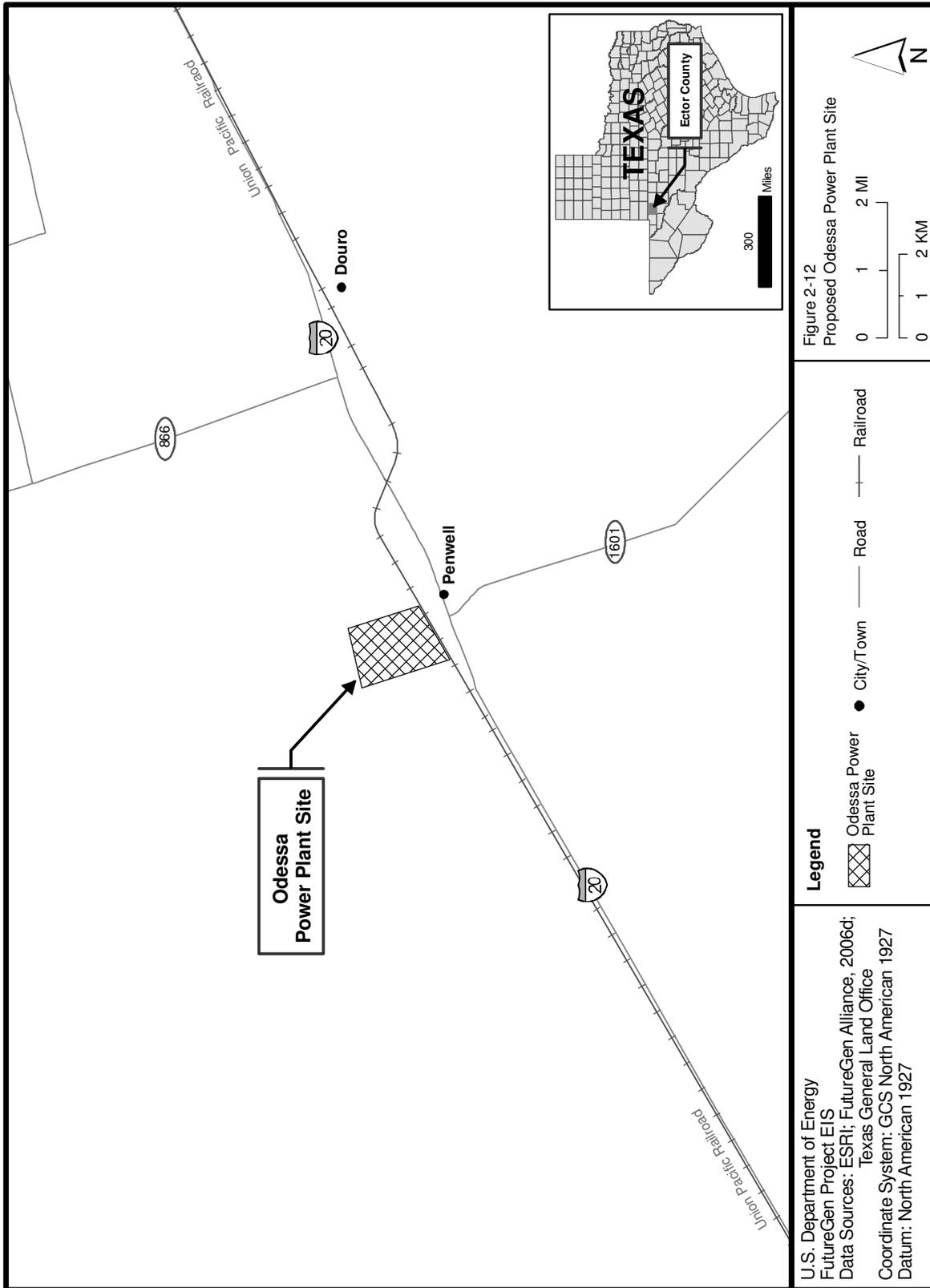
**Table 2-4. Odessa Site Features**

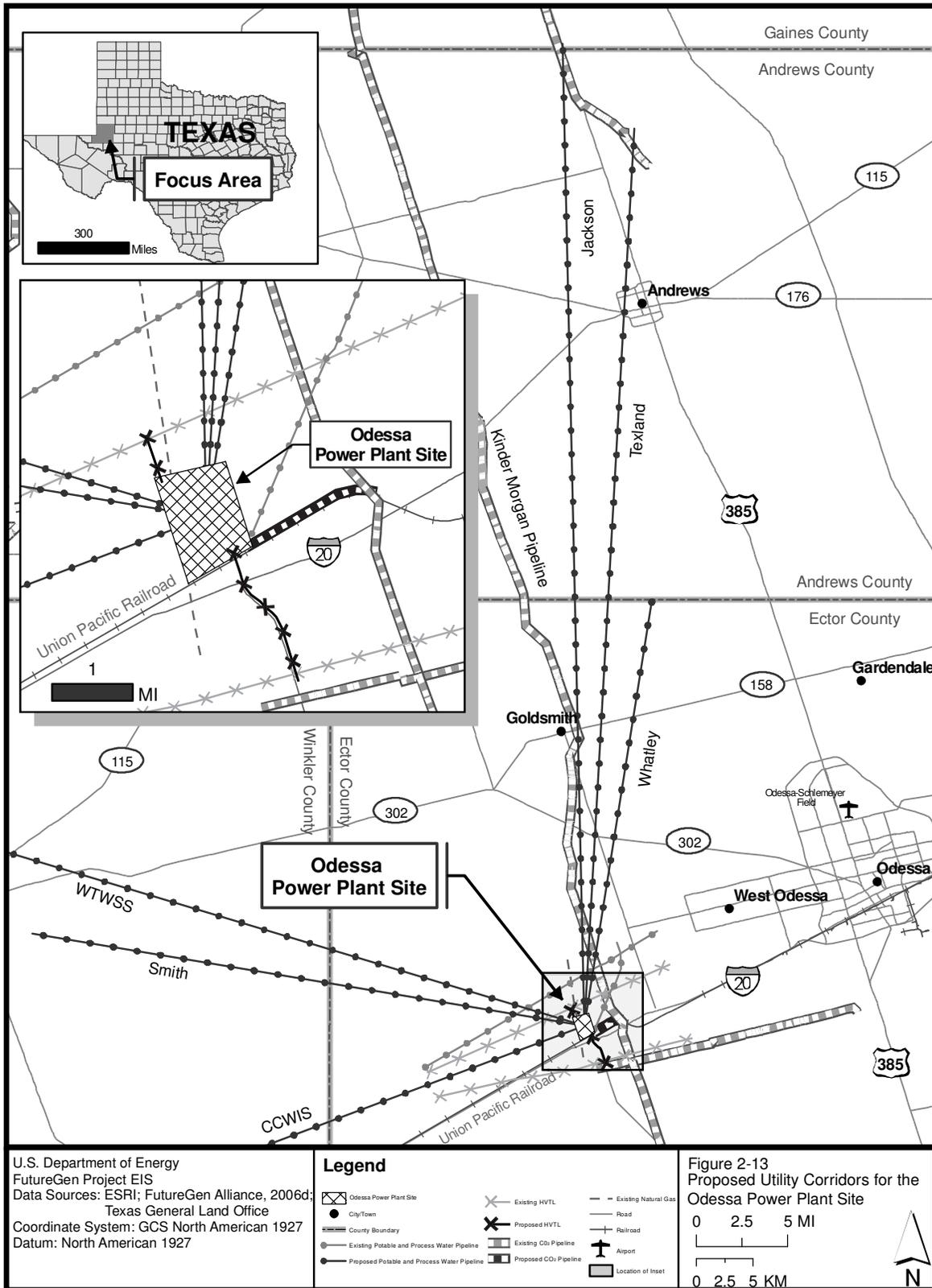
Feature	Description
Process Water	<p>Process water could be acquired by developing new well fields or from several existing well fields that draw water from the Ogallala, Pecos Valley, Edwards-Trinity Plateau, Dockum, or Capitan Reef aquifers. Six existing well fields have been identified that could deliver water to the site, ranging from 24 to 54 miles (38.6 to 86.9 kilometers) from the proposed power plant site (straight-line distance). Any of these six potential sources would require pipeline construction along new ROWs.</p> <p><b><i>Since the issuance of the Draft EIS, the Site Proponents have provided another process water option. Odessa has offered to provide raw or treated water from the City of Odessa's water treatment plant using a new, approximately 17-mile (27.4-kilometer), process water pipeline (see Figure S-A). All but 1 mile (1.6 kilometers), approximately 5,000 feet (1,524 meters), of the distance of the new process water pipeline would either use existing public road ROWs (e.g., it would be installed under ground on the north side of 42<sup>nd</sup> Street) or be within the region of influence (ROI) analyzed in the Draft EIS for the Texland Great Plains water corridor. The new, less than 1-mile (1.6-kilometer) corridor requiring new ROW would traverse rangeland similar to that described for the Texland Great Plains water corridor.</i></b></p> <p><b><i>The water supply would be from the City of Odessa which receives its raw water from the Colorado River Municipal Water District (CRMWD). The CRMWD is the legislatively created entity whose mission is to provide water to several communities in this region of Texas. The CRMWD currently owns and utilizes three reservoirs and four active well fields (the groundwater is typically used only during summer months to meet peak demands) (City of Odessa, 2007).</i></b></p>
Sanitary Wastewater	Sanitary wastewater would be treated and disposed of through construction and operation of a new on-site sanitary WWTP. Effluent from the WWTP would be treated and disposed of in accordance with local and state regulations or recycled back into the proposed power plant for use as process water.
Electric Transmission Lines	The proposed power plant would connect with one of two 138-kV transmission lines, one approximately 0.7 mile (1.1 kilometers) on new ROW and the second approximately 1.8 miles (2.9 kilometers) on existing ROW from the proposed site. In either case, the interconnection would only require the construction of a substation and a short transmission line to tie into these lines. The southern corridor would follow an existing ROW along FM 1601, which borders the proposed site, while a new ROW would be required for the northern route option.
Natural Gas	The proposed power plant would tap an existing natural gas pipeline that traverses the proposed plant site and that is owned and operated by ATMOS Energy.

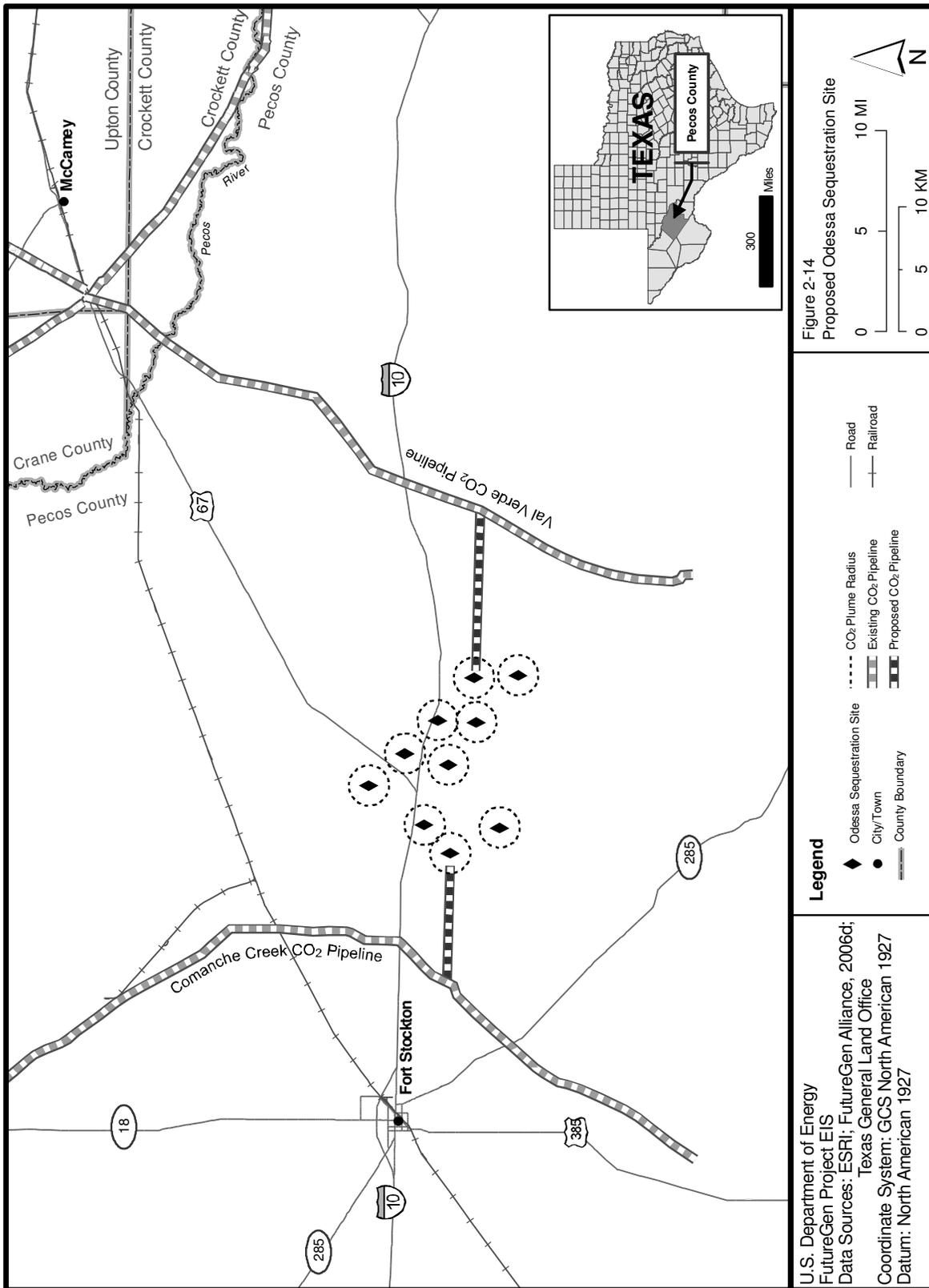
Table 2-4. Odessa Site Features

Feature	Description
CO <sub>2</sub> Pipeline	<p><b>As proposed in the Draft EIS</b>, the proposed injection wells would be located on 42,300 acres (17,118 hectares) of University of Texas lands, 58 miles (93.3 kilometers) south of the proposed Odessa Power Plant Site. CO<sub>2</sub> would be transported in (and co-mingled in) an existing <b>CO<sub>2</sub> pipeline with varying diameter just east of the plant site operated by Kinder Morgan CO<sub>2</sub> Company (the Central Basin CO<sub>2</sub> pipeline). The CO<sub>2</sub> would then flow into one or two pipelines owned by PetroSource Inc. (the Comanche Creek Pipeline or the Val Verde Pipeline)</b>. Two miles (3.2 kilometers) of new CO<sub>2</sub> pipeline would connect the proposed power plant site to the existing <b>Central Basin pipeline</b>, and approximately 7 to 14 miles (11.3 to 22.5 kilometers) of new pipeline would connect the existing <b>PetroSource pipelines</b> to the proposed injection site. Because multiple injection wells would be used, intra-well piping would also be installed to connect the wells to the main pipelines.</p> <p><b>Since issuance of the Draft EIS, Alliance and DOE investigations have revealed that it would not be feasible at this time to transport CO<sub>2</sub> from the proposed power plant site at Odessa to the proposed injection well site using the PetroSource Val Verde CO<sub>2</sub> pipeline located east of the injection site, as originally stated in the Draft EIS. Therefore, Odessa has offered two additional CO<sub>2</sub> pipeline options:</b></p> <ul style="list-style-type: none"> <li>• <b>Option 1- Construction and operation of a new, approximately 90-mile (145-kilometer) dedicated pipeline from the FutureGen plant to the injection site along existing rights-of-way; and</b></li> <li>• <b>Option 2 – Use of existing pipeline owned by Kinder Morgan CO<sub>2</sub> Company and the construction and operation of a new, approximately 30-mile (48-kilometer) dedicated pipeline (ranging from 6 to 12 inches [15.2 to 30.5 cm] in diameter) from the end of the Kinder Morgan line (near McCamey, Texas) to the injection sites. Option 2 would require additional sulfur removal either at the FutureGen plant or in a separate sulfur removal plant operated by Kinder Morgan.</b></li> </ul> <p><b>The original option could be used to transport CO<sub>2</sub> to the sequestration site only through the PetroSource Inc. Comanche Creek Pipeline (it was learned that the Val Verde Pipeline flows the wrong direction). The Comanche Creek Pipeline is a 6-inch (15.2 cm) diameter pipeline that with upgrades, could carry only enough CO<sub>2</sub> to reach the goal of MMT/yr, but it could not deliver the maximum amount that could be captured by FutureGen's 2.8 MMT/yr.</b></p>
Transportation Corridors	<p>The southern border of the proposed plant site is less than 0.5 mile (0.8 kilometer) from I-20, with an improved roadway that borders the property. A Union Pacific Railroad line runs along the southern border of the site. Deliveries to or from the proposed site could be accomplished by either rail or truck.</p> <p>Texas is located in the West South Central Demand Region for coal, which also includes Louisiana, Arkansas, and Oklahoma. According to the Energy Information Administration (EIA, 2000), the West South Central Demand Region receives the majority of its coal resources from the PRB and the Rockies. In 1997, the average distance that a coal shipment traveled to reach a destination in this region was about 1,300 miles (2,092 kilometers) (EIA, 2000). In terms of a straight-line distance, Odessa is approximately 1,250 miles (2,012 kilometers) from the Pittsburgh Coalbed (south-central Ohio in the northern Appalachian Basin), 900 miles (1,448 kilometers) from the Illinois Basin (southern Illinois), and 800 miles (1,287 kilometers) from the PRB (eastern Wyoming). While no sources of coal are available near the proposed plant site, Texas does have several coal mines in the eastern and southern portions of the state. The closest operating Texas coal mine is the Eagle Pass Mine, approximately 250 miles (402 kilometers) to the southwest of Odessa.</p>

Source: FG Alliance, **2006d** (unless otherwise noted).







## **2.4.5 NEW OPTIONS FROM SITE PROPONENTS' BEST AND FINAL OFFERS**

*To complete the site proposal process, the Alliance offered an opportunity for the Site Proponents to submit Best and Final Offers (BAFOs) on their proposals. Pursuant to directions from the Alliance, the four candidate Site Proponents submitted BAFOs to the Alliance on August 1, 2007.*

*The Mattoon and Odessa Site Proponents provided additional water and CO<sub>2</sub> pipeline options for the Alliance to consider in its final siting decision. Neither the Tuscola nor Jewett Site Proponents put forward additional options for consideration that might have potential environmental impacts. Other information provided by the Site Proponents in their BAFO submissions relates solely to potential business arrangements between the Alliance and the Site Proponents.*

*The new Mattoon and Odessa options were not described in the Draft EIS. Nevertheless, as variations of the alternatives, DOE is considering their potential environmental consequences in this section of the EIS. The following additional options are considered reasonable for purposes of NEPA analysis.*

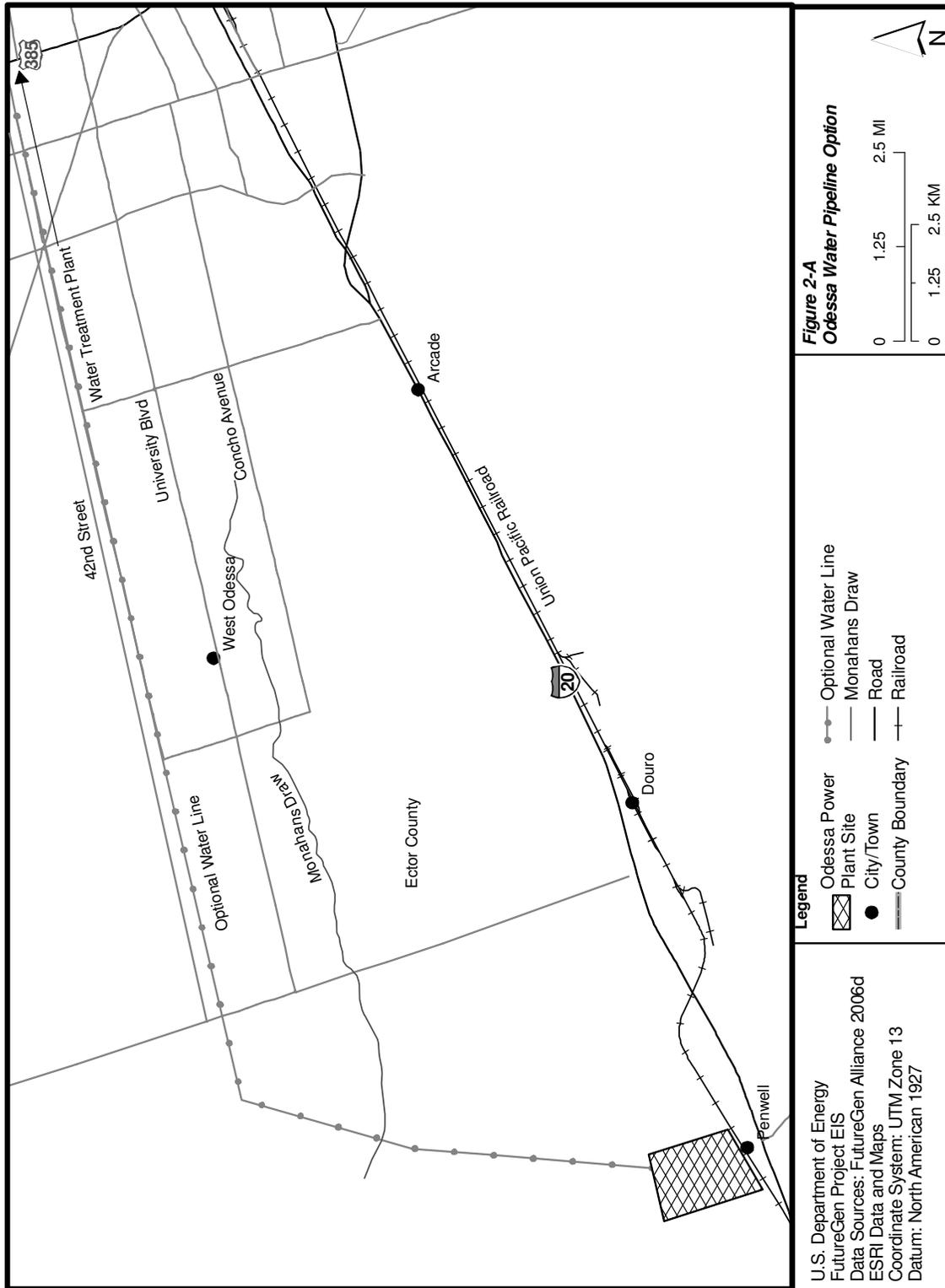
### **2.4.5.1 Mattoon Process Water Pipeline**

*After issuance of the Draft EIS, a slight modification of the 6.2-mile (10.0-kilometer) process water pipeline was submitted to the Alliance by the Site Proponent (see Table S-1). As described in the Draft EIS, a 6.2-mile (10.0-kilometer) process water pipeline would be constructed, with all but 1 mile (1.6 kilometers) within an existing public ROW located within the city boundary. The new 1-mile (1.6-kilometer) corridor requiring new ROW would be constructed along the south side of a road. To avoid a potential land use conflict, however, Mattoon has obtained an easement for one parcel of land along the north side of the road, such that the process water pipeline would cross underneath the road at that property line and continue along the north side of the road for approximately 0.5 mile (0.8 kilometer), crossing back underneath the road to continue along the south side of the road as originally proposed. This slight modification of the process water pipeline alignment would have the same types and magnitudes of impacts as those described in this EIS.*

### **2.4.5.2 Odessa Process Water Pipeline**

*Odessa has offered to provide raw or treated water from the City of Odessa's water treatment plant using a new, approximately 17-mile (27.4-kilometer), process water pipeline (see Figures S-A and 2-A). All but 1 mile (1.6 kilometers), approximately 5,000 feet (1,524 meters), of the distance of the new process water pipeline would either use existing public road ROWs (e.g., it would be installed under ground on the north side of 42<sup>nd</sup> Street) or be within the ROI analyzed in the Draft EIS for the Texland Great Plains water corridor. The new, less than 1-mile (1.6-kilometer) corridor requiring new ROW would traverse rangeland similar to that described for the Texland Great Plains water corridor.*

*The water supply would be from the City of Odessa which receives its raw water from the Colorado River Municipal Water District (CRMWD). The CRMWD is the legislatively created entity whose mission is to provide water to several communities in this region of Texas. The CRMWD currently owns and utilizes three reservoirs and four active well fields (the groundwater is typically used only during summer months to meet peak demands) (City of Odessa, 2007).*



*The CRMWD has sufficient excess supply to meet the FutureGen Project water demand. The CRMWD acquires surface water from three primary sources. The largest is the O.H. Ivie Reservoir in Concho County. Water from the O.H. Ivie Reservoir is delivered to the City of Odessa water treatment plant through a 60-inch (1.52-meter) diameter, approximately 157-mile (253-kilometer) pipeline (CRMWD, 2007). However, water from J.B. Thomas and E.V. Spence reservoirs can also be furnished to the City of Odessa water treatment plant.*

*The firm yield (maximum yield that can be delivered by the O.H. Ivie Reservoir even through a severe drought) is approximately 95,000 acre-feet per year (equivalent to 85 million gallons per day [MGD] or 320 million liters per day [MLD]). Major long-term contract users of this source include the City of Abilene, City of Midland, and City of San Angelo, whose combined contract amount is 45,000 acre-feet per year (equivalent to 40.1 MGD or 152 MLD) (TWDB, 2001a), which is less than half of the firm yield of the reservoir. The combined permitted diversion from the E.V. Spence and J.B. Thomas reservoirs is 3,000 acre-feet per year (equivalent to 2.7 MGD or 10 MLD) (TWDB, 2001b).*

*Groundwater is used in conjunction with CRMWD's surface reservoirs to meet customer demands during periods of low flow in surface waters. The CRMWD obtains groundwater from four active well fields: Ward County, Odessa, Snyder, and Martin. The largest well field is the Ward County field located near Monahans, about 25 miles (40 kilometers) west of the Odessa Site. This well field produces water from the Pecos aquifer, and consists of approximately 37 wells. Information on groundwater availability of the Pecos aquifer within Ector, Winkler, and Ward counties is provided in Section 7.6. This well field has a peak capacity of about 28 MGD (106 MLD). About 24 MGD (91 MLD) of this water can be delivered to the City of Odessa water treatment plant (CRMWD, 2007). The remaining three well fields are typically used as back-up or standby supplies.*

*The City of Odessa's water treatment plant has a peak capacity of approximately 50 MGD (189 MLD) for surface water and 20 MGD (76 MLD) for groundwater (City of Odessa, 2007). The City's peak daily demand is approximately 36.5 MGD (135 MLD). FutureGen would require 4.3 MGD (16.2 MLD), so that even during peak water demand, the City's water treatment plant would have adequate water and treatment capacity to supply water to the FutureGen Project (see Table 2-A and S-A).*

*Table 2-A. City of Odessa Water Supply and Treatment Capacity*

<i>Water Supply – O.H. Ivie Reservoir</i>	<i>40.1 MGD (152 MLD)</i>
<i>Water Supply – E.V. Spence and J.B. Thomas reservoirs</i>	<i>2.7 MGD (10.2 MLD)</i>
<i>Groundwater Supply – Ward County</i>	<i>24.0 MGD (91 MLD)</i>
<i>Total Available Water Supply</i>	<i>0 MGD (253 MLD)</i>
<i>Treatment Capacity</i>	<i>70.0 MGD (265 MLD)</i>
<i>Peak Daily Demand</i>	<i>36.5 MGD (135 MLD)</i>
<i>FutureGen Demand</i>	<i>4.3 MGD (16.2 MLD)</i>
<i>Peak Daily Demand with FutureGen</i>	<i>40.8 MGD (154 MLD)</i>

*Source: City of Odessa, 2007.*

*The original proposal and Section S.4.2.4, Table S-12, Sections S.10.3.3, 2.4.4, and 2.4.5, Table 3-3, and Chapter 7, stated that process water would be acquired by developing new well fields or from several existing well fields that draw water from different groundwater aquifers; up to 54 miles (86.9 kilometers) of new pipeline ROW would be required. The option to obtain process water from the City*

*of Odessa would require a shorter pipeline (of which about 60 percent would use existing ROW) and thus would likely have fewer impacts than the longer pipeline options that were described in the proposal (see Tables S-12 and 3-3). The new pipeline option would cross similar terrain as the pipeline options analyzed in the EIS for Odessa; therefore, impacts would be similar.*

### ***2.4.5.3 Odessa CO<sub>2</sub> Pipeline Options***

*The original proposal (and EIS sections identified in Sections S.4.2.4, 2.4.4, 2.4.5 and Chapter 7) stated that CO<sub>2</sub> would be transported (and co-mingled) in existing Kinder Morgan and PetroSource CO<sub>2</sub> pipelines leading to the injection site, with an approximately 2-mile (3.2-kilometer) CO<sub>2</sub> pipeline spur from the FutureGen plant to the existing Kinder Morgan CO<sub>2</sub> pipeline and 7- to 14-mile (11.3- to 22.5-kilometer) spurs from the existing PetroSource CO<sub>2</sub> pipelines to the injection well sites.*

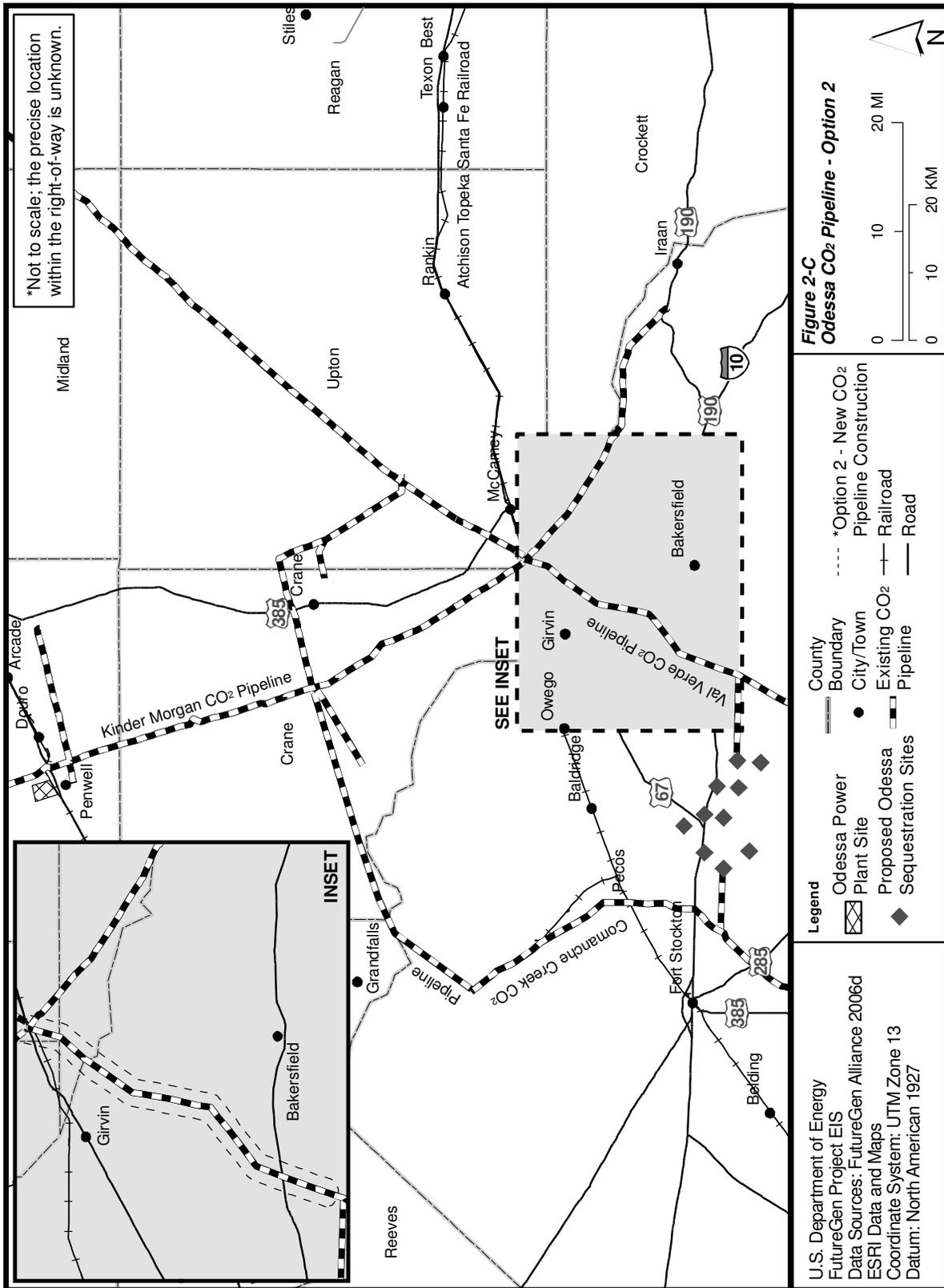
*Odessa also offered two additional CO<sub>2</sub> pipeline options (see Figures 2-B, 2-C, S-B and S-C):*

- Option 1 – Construction and operation of a new, approximately 90-mile (145-kilometer) dedicated pipeline from the FutureGen plant to the sequestration site along existing ROWs (Figures 2-B and S-B); and,*
- Option 2 – Use of the existing pipeline owned by Kinder Morgan CO<sub>2</sub> Company and the construction and operation of a new, approximately 30-mile (48-kilometer) dedicated pipeline (ranging from 6 to 12 inches [15.2 to 30.5 centimeters] in diameter) from the end of the Kinder Morgan line (near McCamey, Texas) to the injection well sites (Figures 2-C and S-C). Option 2 would require additional sulfur removal either at the FutureGen plant or in a separate sulfur removal plant operated by Kinder Morgan.*

*Odessa originally proposed an option for transporting CO<sub>2</sub> in the existing Kinder Morgan CO<sub>2</sub> pipeline along with PetroSource's existing Val Verde pipeline and PetroSource's existing (but not currently operating) Comanche Creek pipeline that runs to the east side and the west side, respectively, of the proposed sequestration site. However, the existing Val Verde CO<sub>2</sub> pipeline, which runs to the east of the proposed sequestration site, could not be used to transport FutureGen CO<sub>2</sub> to the proposed sequestration site. The Val Verde pipeline carries CO<sub>2</sub> northwards, rather than southwards as would be required for the original proposal. Given PetroSource's current use of the Val Verde pipeline to carry CO<sub>2</sub> northwards, it would be infeasible to use this line to transport FutureGen CO<sub>2</sub> southwards to the proposed injection site.*

*Use of the existing Comanche Creek pipeline would require upgrades such as repairing or replacing sections of the pipeline or pipeline components. In addition, normal pipeline safety analysis and leak testing, similar to that conducted for new pipelines, would be required and conducted along the length of the pipeline. DOE calculations show that the existing Comanche Creek 6-inch (15.2-centimeter) pipeline would be sufficient to transport a maximum of about 1.1 million tons (1 MMT) of CO<sub>2</sub> per year, although two booster pumps would need to be installed about 25 miles (40 kilometers) apart along the line to maintain pressure (FG Alliance, 2007a). Power for the pumps would be supplied from two existing 69-kV transmission lines that intersect the Comanche Creek pipeline and substations that are located near the pipeline. Up to 10 miles (16 kilometers) of distribution lines from the substations to the pumps may be required. The pumps would likely be housed in a small shed (similar to a backyard shed, approximately 150 square feet [14 square meters]) which would contain the pump, controller, and electrical switchgear. The pump shed would be fenced and placed within the existing pipeline ROW.*





**Figure 2-C**  
**Odessa CO<sub>2</sub> Pipeline - Option 2**

U.S. Department of Energy  
FutureGen Project EIS  
Data Sources: FutureGen Alliance 2006d  
ESRI Data and Maps  
Coordinate System: UTM Zone 13  
Datum: North American 1927

**Legend**

- County Boundary
- City/Town
- Odessa Power Plant Site
- Proposed Odessa CO<sub>2</sub> Pipeline
- Sequestration Sites
- \*Option 2 - New CO<sub>2</sub> Pipeline Construction
- Existing CO<sub>2</sub> Pipeline
- Railroad
- Road

*Any new CO<sub>2</sub> pipelines would be constructed and operated by either Kinder Morgan CO<sub>2</sub> Company, Occidental Petroleum Corporation, PetroSource, or Trinity CO<sub>2</sub> LLC and would follow existing ROWs (short CO<sub>2</sub> pipeline spurs from the power plant site to the existing Kinder Morgan pipeline and from existing PetroSource CO<sub>2</sub> pipelines to the sequestration site were addressed in the EIS). Obtaining new pipeline ROW is a common occurrence in West Texas. The construction and operation of new CO<sub>2</sub> pipelines is not expected to have environmental impacts of a different nature, in addition to what has already been forecasted in the EIS because construction would occur within existing ROW and would traverse similar terrain as was analyzed in the EIS for the original proposal.*

*To use the existing Kinder Morgan CO<sub>2</sub> pipeline for Option 2 and the original proposal, additional sulfur would need to be removed from the CO<sub>2</sub> stream. If this option were to be selected, it would be likely that the FutureGen plant would be designed to provide for an additional scrubbing column to the Acid Gas Removal Unit and to increase the recirculation rate of the scrubbing solvent. No additional water treatment chemicals would be required for this additional column; the volume of elemental sulfur created by this process would increase by less than 3 percent over that which was described in the original proposal. For these reasons, no additional environmental impacts would be expected beyond those described in Section 7.16. If Kinder Morgan were to construct and operate a sulfur removal plant at the FutureGen power plant site (i.e., not part of the FutureGen plant), it would likely use solid metal oxide adsorbents in fixed beds to remove the sulfur from the CO<sub>2</sub>.*

*For the removal of sulfur, there are a broad range of technologies available including guardbeds or molecular sieves. Byproduct generation and waste streams would likely be minimal and could be integrated with those from FutureGen operations and byproducts would be minimized. Potential byproducts include those similar to that from the FutureGen Claus plant (analyzed in this EIS) and perhaps zinc oxide if a guardbed is utilized. Where possible, adsorbent materials would be regenerated and byproducts and wastes minimized. Due to the relatively small amount of hydrogen sulfide in the feed stream (<100 parts per million [ppm]), waste quantities would be minimal compared to that in the power plant.*

*Odessa also proposed as an option “CO<sub>2</sub> swapping.” Through this option, CO<sub>2</sub> generated by a FutureGen plant located in Odessa would be directed into the CO<sub>2</sub> pipeline owned by Kinder Morgan CO<sub>2</sub> Company where it would be transported and sold for enhanced oil recovery (EOR). CO<sub>2</sub> separated by natural gas processing plants located south of the proposed Odessa injection site would be transported northwards through the PetroSource Val Verde CO<sub>2</sub> pipeline and injected at the proposed Odessa injection site. Thus, while the goal for injection and storage of the CO<sub>2</sub> could be met, no CO<sub>2</sub> from the FutureGen plant would reach the injection site under this option. Both DOE and the Alliance have determined that this option would not meet one of the key purposes of the FutureGen project, which is to demonstrate the integration of a coal-fueled power plant with CO<sub>2</sub> capture and sequestration. For this reason, DOE has determined that this option is unreasonable and has eliminated it from further consideration in this EIS.*

#### ***2.4.5.4 Potential Impacts of Proposed Odessa Pipeline Route Options***

*The affected environment and environmental impacts from construction of the new Odessa water and CO<sub>2</sub> pipeline options were assessed by evaluating several sources. These sources include review of aerial photographs (2005) and topographic maps (2005) for the area; the National Hydrology Dataset from the United States Geologic Survey (1999) for water bodies, streams/washes, and springs; the Texas Parks and Wildlife Department (2003) for vegetation; Soil Data Mart via the United States Department of Agriculture, Natural Resources Conservation Service for Soils (2007); National Wetland Inventory*

*(NWI) data for wetlands (2002); and ESRI Data and Maps (2005) for Census and traffic and transportation information.*

*The new Odessa water and CO<sub>2</sub> pipeline options would not require changes to sections of the EIS that address potential impacts to resources as there were no impacts from the construction or operations of the new pipelines options, under the following topical headings: Climate and Meteorology, Geology, Community Services, Socioeconomics, and Environmental Justice.*

*Table 2-B briefly describes the potential impacts associated with the new Odessa water and CO<sub>2</sub> pipeline options presented in the BAFO.*

***Table 2-B. Potential Impacts Associated with the New Odessa Process Water Pipeline and CO<sub>2</sub> Pipeline Options***

<i>Resource Area</i>	<i>Relevance to the Potential Environmental Impacts</i>
<b><i>New Odessa Water Pipeline Option</i></b>	
<i>Air Quality, Soils, Biological, Transportation and Traffic, and Noise and Vibration</i>	<p><i>Under the new water pipeline option, impacts associated with these resource areas would be temporary, occurring during the construction phase and reduced or mitigated through best management practices (BMPs) discussed in Section 3.4, Table 3-13, and Table 3-14.</i></p> <p><i>Under Air Quality, emissions of sulfur dioxide (SO<sub>2</sub>), nitrogen oxides (NO<sub>x</sub>), particulate matter (PM), carbon monoxide (CO), and volatile organic compounds (VOCs) from construction would be localized and temporary in nature and could cause minor to moderate short-term degradation of air quality in areas where pipeline construction is taking place.</i></p> <p><i>Soils would be temporarily disturbed during construction. No prime farmland soils were found in the vicinity of the proposed water pipeline.</i></p> <p><i>Wildlife species found along this corridor could be temporarily displaced during construction, but the land above the pipeline would be revegetated with native species after construction, maintaining wildlife habitat similar to current conditions.</i></p> <p><i>Minor disruptions to traffic could occur along one major and 47 minor roads during construction but would not create a substantial direct impact or long-term impact to traffic operations.</i></p> <p><i>Sensitive receptors in the vicinity of construction areas would temporarily experience elevated noise levels; however, such impacts would be minimal. Based on available data, 12 churches and 5 schools are located within a 1-mile (1.6-kilometer) ROI of the proposed water pipeline route.</i></p>
<i>Groundwater (Use)</i>	<p><i>Under this option, the CRMWD would supply water. The CRMWD currently owns and utilizes three reservoirs and four active well fields. Groundwater would only be used during the summer months to meet peak demands. Impacts to groundwater availability would be minimal as discussed in Section S.4.3.2.</i></p>
<i>Surface Water (Use)</i>	<p><i>Under this option, water would be required during construction for dust suppression and equipment washdown, and would most likely be trucked to areas where needed; no water would be withdrawn from local surface waters. Construction of the pipeline would disturb land along the water pipeline corridor, which could cause temporary indirect impacts to adjacent surface waters (for example, Monahans Draw) such as sedimentation and surface water turbidity from runoff. Impacts to surface water availability would be negligible as discussed in Section S.4.3.2.</i></p>

**Table 2-B. Potential Impacts Associated with the New Odessa Process Water Pipeline and CO<sub>2</sub> Pipeline Options**

<i>Resource Area</i>	<i>Relevance to the Potential Environmental Impacts</i>
<i>Wetlands and Floodplains</i>	<p>NWI mapping indicates that at least one intermittent palustrine wetland (less than 8 acres [3.2 hectares]) located along the proposed water pipeline may be impacted under this option. Field verification would be required to confirm NWI mapping and to determine if any additional wetlands are present, and if so, the value of any wetlands occurring along the corridor. Any impacts would be reduced or mitigated through BMPs discussed in Section 3.4, Table 3-13, and Table 3-14. The alignment of the water pipeline could be modified to avoid the wetland or construction could be modified to reduce potential impacts.</p> <p>Based on available floodplain information, floodplains are present along the Odessa water pipeline option. However, temporarily adding or excavating fill during construction within the floodplain would have no permanent impact on the lateral extent, depth, or duration of flooding in the floodplain areas traversed. Any temporary impacts would be reduced or mitigated through BMPs discussed in Section 3.4, Table 3-13, and Table 3-14.</p>
<i>Cultural Resources</i>	<p>Within the ROI for the Odessa Site, the potential exists for cultural resources to be present. A Phase I survey would be needed to identify if any cultural resources exist along the water pipeline route, after the exact position of the route has been identified.</p>
<i>Land Use</i>	<p>Under this option, construction of the approximately 17-mile (27.6-kilometer) proposed water pipeline would have temporary, minor effects on land use during construction due to trenching, equipment movement, and material laydown. The ability to use some lands for their existing uses would be temporarily lost during construction. However, where the pipeline would be constructed in the existing ROW, long-term land use would not change. Where new ROW would be acquired, it is not anticipated that long-term land use would change, because this land is used as range land. The new, less than 1-mile (1.6-kilometer) section of the corridor would be within the same land use type as that found in the Texland corridor ROI.</p>
<i>Materials and Waste Management</i>	<p>Clearing of vegetation and grading during construction may create land debris that would require removal from the site. Construction debris disposal capacity is available at area landfills.</p> <p>Construction equipment would require fuel, oils, lubricants, and coolants. Should any of these require disposal, they would be appropriately managed and disposed of by the construction contractor.</p> <p>During normal operation, the water pipeline would not require additional materials and would not generate waste, other than cleared vegetation, if necessary, that could be disposed of at a non-hazardous waste landfill.</p>
<i>Utility Systems</i>	<p>No current information on utilities was available for the proposed water pipeline option. However, there is a potential for temporary impacts to underground utilities during construction.</p>

**Table 2-B. Potential Impacts Associated with the New Odessa Process Water Pipeline and CO<sub>2</sub> Pipeline Options**

<i>Resource Area</i>	<i>Relevance to the Potential Environmental Impacts</i>
<b><i>New Odessa CO<sub>2</sub> Pipeline Options</i></b>	
<p><b><i>Air Quality, Soils, Biological, Transportation and Traffic, and Noise and Vibration</i></b></p>	<p>Under the new CO<sub>2</sub> pipeline Options 1 and 2, impacts associated with these resource areas would be temporary, occurring during the construction phase and reduced or mitigated through BMPs discussed in Section 3.4, Table 3-13, and Table 3-14.</p> <p>Under Air Quality, emissions of SO<sub>2</sub>, NO<sub>x</sub>, PM, CO, and VOCs from construction of Options 1 or 2 would be localized and temporary in nature and could cause minor to moderate short-term degradation of air quality in areas where construction is taking place.</p> <p>Soils would be temporarily disturbed during construction of pipeline Options 1 and 2. According to available data, no prime farmland soils were found in Crane, Crockett, or Ector counties. Prime farmland soils were found in Pecos County. However, it was not possible to determine if these soils are in the vicinity of the proposed new CO<sub>2</sub> pipelines based on available data.</p> <p>Wildlife species found along this corridor could be temporarily displaced during construction of pipeline Options 1 and 2. However, the land above the pipeline would be revegetated with native species after construction, maintaining wildlife habitat similar to current conditions.</p> <p>Minor disruptions to traffic could occur along up to 4 major and 119 minor roads during construction of pipeline Options 1 and 2, but would not create a substantial direct impact to traffic operations.</p> <p>Based on available data, no churches or schools were found adjacent to Options 1 and 2. Any additional sensitive receptors in the vicinity of construction areas would temporarily experience elevated noise levels; however, such impacts would be minimal.</p>
<p><b><i>Wetlands and Floodplains</i></b></p>	<p>An analysis of NWI maps indicates that 20 palustrine wetlands and 1 riverine wetland occur within the ROI near where the pipeline would cross the Pecos River for both Options 1 and 2. The palustrine wetlands range from 0.10 to 3.2 acres (0.04 to 1.3 hectares) in size, for a total of 15.9 acres (6.4 hectares). The size of the riverine wetland is not known, but potentially encompasses the whole length of the Pecos River segment within the ROI. These wetlands are directly associated with the Pecos River and nearby meander cutoffs formed by the river over time. After the precise pipeline location is determined, field verification would be required to determine if any jurisdictional wetlands are present and, if so, the value of the wetlands. Any impacts that could not be avoided by repositioning the pipeline location would be reduced or mitigated through BMPs discussed in Section 3.4, Table 3-13, and Table 3-14. If wetlands are present, the alignment of the pipeline could be modified to avoid the wetland or construction could be modified to reduce potential impacts.</p> <p>Based on available floodplain information, floodplains are present along the CO<sub>2</sub> pipeline for Options 1 and 2. However, temporarily adding or excavating fill during construction within the floodplain would have no permanent impact on the lateral extent, depth, or duration of flooding in the floodplain areas traversed. Any temporary impacts would be reduced or mitigated through BMPs discussed in Section 3.4, Table 3-13, and Table 3-14.</p>

**Table 2-B. Potential Impacts Associated with the New Odessa Process Water Pipeline and CO<sub>2</sub> Pipeline Options**

<i>Resource Area</i>	<i>Relevance to the Potential Environmental Impacts</i>
<i>Surface Water</i>	<i>In both Options 1 and 2, the pipeline would cross the upper Pecos River (Segment 2311) near where the western tip of Crockett County meets Crane and Pecos counties. This segment was listed as impaired in the 2006 Texas Commission on Environmental Quality (TCEQ) 303(d) list due to depressed oxygen levels. Sediment loading is another concern for the Pecos River. Careful planning would be needed to minimize sediment impacts to the Pecos River during construction activities. [Reference: Draft Watershed Protection Plan for the Pecos River in Texas, Texas State Soil and Water Conservation Board <a href="http://pecosbasin.tamu.edu/wpp.php">http://pecosbasin.tamu.edu/wpp.php</a>.</i>
<i>Cultural Resources</i>	<i>Within the ROI for the Odessa Site, the potential exists for cultural resources to be present. A Phase I survey would be needed to identify if any cultural resources exist along the proposed CO<sub>2</sub> pipeline for Options 1 and 2, after the exact position of the route has been identified.</i>
<i>Land Use</i>	<i>Under pipeline Options 1 and 2, construction of the CO<sub>2</sub> pipeline would have temporary, minor effects on land use during construction due to trenching, equipment movement, and material laydown. The ability to use some lands for their existing uses would be temporarily lost during construction. However, because the pipeline would be constructed in the existing ROW, long-term land use would not change.</i>
<i>Aesthetics</i>	<i>Under pipeline Option 2, the potential exists for visual impacts to receptors and travelers as a result of the sulfur removal plant at the FutureGen Power Plant or another location (currently unknown). Additionally, two booster pumps would be located somewhere along the CO<sub>2</sub> pipeline.</i>
<i>Utility Systems</i>	<i>No current information on utilities was available for the new CO<sub>2</sub> pipelines. However, there is a potential for temporary impacts to underground utilities during construction.</i>
<i>Materials and Waste Management</i>	<p><i>Clearing of vegetation and grading during construction may create land debris that would require removal from the site. Construction debris disposal capacity is available at area landfills.</i></p> <p><i>Construction equipment would require fuel, oils, lubricants, and coolants. Should any of these fluids require disposal, they would be appropriately managed and disposed of by the construction contractor.</i></p> <p><i>During normal operation, the CO<sub>2</sub> pipeline would not require additional materials and would not generate waste, other than cleared vegetation, if necessary, that could be disposed of at a non-hazardous waste landfill.</i></p> <p><i>For the removal of sulfur, there are a broad range of technologies available including guardbeds or molecular sieves. Byproduct generation and waste streams would likely be minimal and could be handled along with those from FutureGen operations. Potential byproducts include those similar to that from the Claus plant and perhaps zinc oxide if a guardbed is utilized. Where possible, adsorbent materials would be regenerated and byproducts/wastes minimized. Due to the relatively small amount of hydrogen sulfide in the feed stream (&lt;100 ppm), waste quantities would be minimal compared to that in the power plant.</i></p>

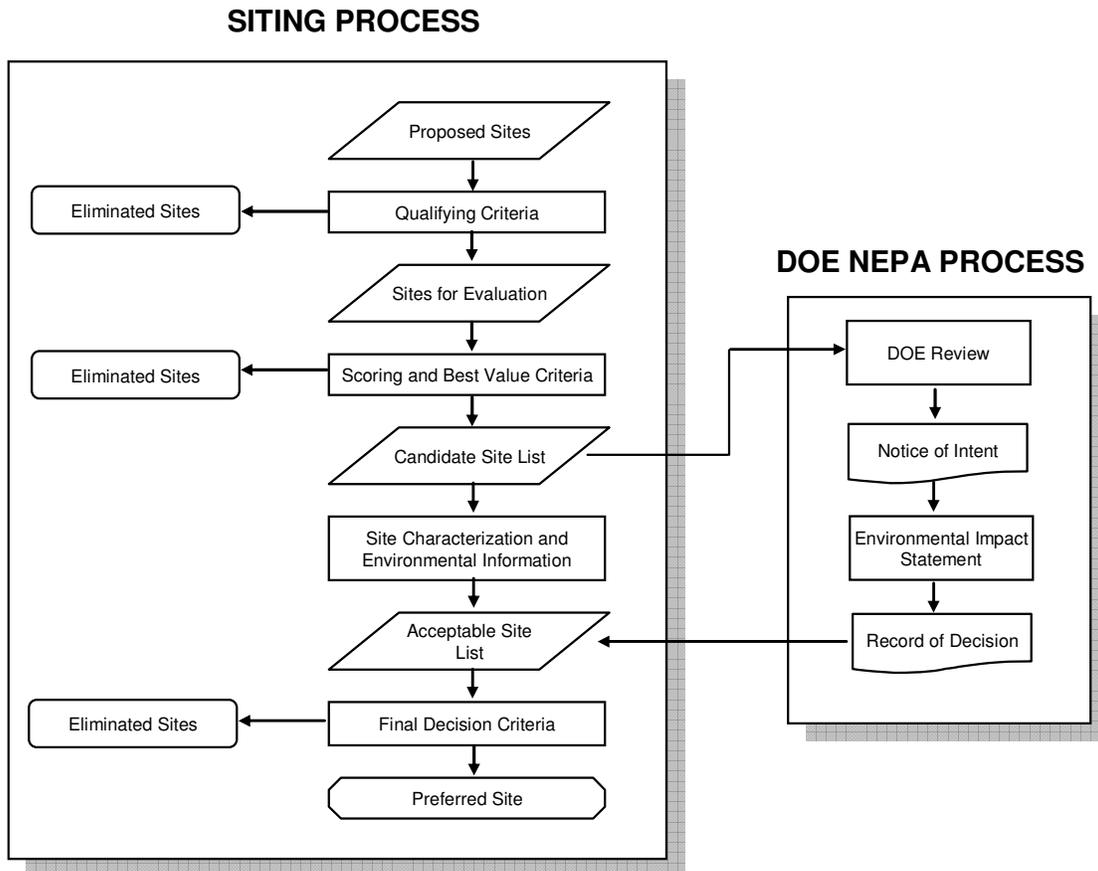
**Table 2-B. Potential Impacts Associated with the New Odessa Process Water Pipeline and CO<sub>2</sub> Pipeline Options**

<i>Resource Area</i>	<i>Relevance to the Potential Environmental Impacts</i>
<i>Health and Safety</i>	<p>Potential occupational health and safety risks during construction of the proposed new CO<sub>2</sub> pipelines are expected to be typical of the risks for this type of construction. Health and safety concerns include: the movement of heavy objects, including construction equipment; slips; trips; and falls; and the risk of fire or explosion from general construction activities. For the two options, the risks of construction accidents would be primarily a function pipeline length, assuming most other factors would be the same per unit length of pipeline for the two options. Option 1 (having three times greater new pipeline length than Option 2) presents about three times greater risks of construction accidents compared to Option 2. Both Options 1 and 2 would present several times greater risks than the construction of only the connector pipelines (from the power plant to the existing pipeline system and from the existing pipelines to the sequestration site) for the original option.</p> <p>The potential for an accidental release (i.e., puncture or rupture) to occur on a newly constructed CO<sub>2</sub> pipeline would be the same, per mile of pipeline, as that analyzed in the EIS and in the Risk Assessment. Assuming the spacing of emergency shut-off valves is the same for all options (5-mile [8-kilometer] spacing), the quantity of gas that could be released varies as a function of the inside diameter of the pipeline (ignoring small differences caused by small differences in pressure). If a new pipeline segment is built between McCamey station and the sequestration site, the use of a larger pipe diameter, such as 12 inches (30.5 centimeters) (e.g., Options 1 and 2) instead of 6 inches (15.2 centimeters) (e.g., original option, using the Comanche Creek pipeline), results in the potential release of a much larger quantity of gas (potentially 4 times as much) on this segment, compared to the original option using the Comanche Creek pipeline, unless the spacing of emergency shut-off valves is different.</p> <p>The Risk Assessment and this EIS present the analysis of a hypothetical 12.8 inch (32.5 centimeters) inside-diameter pipeline with a length of 61.5 miles (99 kilometers) located along a straight path from the proposed power plant site to the middle of the proposed sequestration site. This differs from Option 1 in that the pipeline length is about 30 percent less and in that the location is different. However, the terrain traversed (range land and arid lands) and the population densities within the region of potential effects (up to about 14,000 feet [4,267 meters] from the pipeline for adverse effects from hydrogen sulfide (H<sub>2</sub>S) exposure after a pipeline rupture) are approximately the same. Population density (receptors) in the area surrounding the hypothetical straight-line pipeline route was examined in the Risk Assessment, and the population density is very low, representing the fact that this route traverses remote arid areas where few people live and where livestock density and wildlife densities are low. The proposed pipeline options likewise traverse remote arid areas of low population densities. The nearest town, Girvin, is outside the region of potential effects (more than 14,000 feet [4,267 meters] from the proposed pipeline routes).</p> <p>Including the use of existing pipelines for Option 2 and for the original option, all three options have approximately the same level of risks and potential impacts. A notable difference is that where a new pipeline would be constructed parallel to an existing pipeline and within the ROW of the existing pipeline, there would be a small risk of both pipelines being punctured or ruptured in the same accident. This risk would be much smaller than the risk of a single pipeline puncture or rupture, as presented in the Risk Assessment. Given the conceptual level information provided in the BAFOs, the Risk Assessment adequately addresses the magnitude and types of risks and potential impacts associated with the proposed project, given any one of the new pipeline options. The risks would remain small under any of the options.</p>

## 2.4.6 ALTERNATIVES ELIMINATED FROM FURTHER CONSIDERATION

### 2.4.6.1 Site Selection Process

On December 2, 2005, the Alliance entered into a Limited Scope Cooperative Agreement with DOE for the Alliance to begin the site selection process and prepare a conceptual design for the proposed FutureGen Project. The Alliance developed siting criteria, issued a Request for Proposals (RFP), evaluated proposals received, and visited each proposed site. DOE reviewed Alliance activities at each step in the process to ensure fairness, openness, and technical accuracy. DOE also reviewed the process at each step to ensure that all reasonable alternative sites would be evaluated by DOE in the NEPA process. Figure 2-15 shows an overview of the siting process, which is discussed in detail below.



Source: Adapted from FG Alliance, 2006a

**Figure 2-15. Alliance Siting Process**

### 2.4.6.2 Siting Criteria

Beginning in December 2005, the Alliance Siting Team developed criteria to select sites that could be considered for the FutureGen Project. This Siting Team consisted of scientists, engineers, and others who are either employees of the Alliance member companies, consultants to the Alliance, members of Technical Committees, or employees of Battelle Memorial Institute, the primary support contractor for the Alliance. The Technical Committees are advisory groups of experts, such as distinguished industry consultants, members of academia, employees of national laboratories, and representatives of industry-related organizations. The criteria, which were reviewed and approved by DOE, focused on the goals and objectives for the FutureGen Project, including the need to expeditiously demonstrate a viable CO<sub>2</sub> capture and geologic storage process that would address an issue of national and international importance. In particular, the Siting Team drafted criteria to identify and avoid potential technical, engineering, and environmental challenges that could affect the schedule and success of the FutureGen Project.

Three types of criteria were established:

- Qualifying criteria – Criteria that each site would have to meet before being considered further - failure to meet any criterion resulted in disqualification;
- Scoring criteria – Criteria that would allow sites to be ranked based on the extent to which they possessed desirable features; and
- Best value criteria – Criteria that were not capable of being quantitatively scored, but that represented factors the Alliance would consider when choosing a site that could best fulfill the Project's mission.

The Alliance developed criteria for both the power plant (surface) and geologic storage (subsurface) components and later revised these criteria based on comments from subject-matter experts. The Alliance also sought, received, and considered input from outside stakeholders, including regulatory agencies and environmental groups, through selected interviews and comments received during the formal public comment period. DOE reviewed the rationale and participated in meetings to discuss each criterion before the Alliance published the draft RFP for public comment. The criteria are found in the FutureGen Alliance *Request for Proposals for the FutureGen Facility Host Site* ([http://www.futuregenalliance.org/news/futuregen\\_siting\\_final\\_rfp\\_3-07-2006.pdf](http://www.futuregenalliance.org/news/futuregen_siting_final_rfp_3-07-2006.pdf)) (FG Alliance, 2006a) and in the *Results of Site Offeror Proposal Evaluation* report ([http://www.futuregenalliance.org/publications/fg\\_proposal\\_evaluation\\_report.pdf](http://www.futuregenalliance.org/publications/fg_proposal_evaluation_report.pdf)) dated July 21, 2006 (FG Alliance, 2006a).

### 2.4.6.3 Request for Proposal

The qualifying, scoring, and best value criteria were included in a draft RFP that the Alliance posted to its website (FG Alliance, 2006f) on February 14, 2006, for public review and comment. The Alliance accepted comments regarding the draft RFP until February 28, 2006. Responses to the comments received were posted to the website. The final RFP, revised in accordance with comments received and other considerations, was posted to the Alliance website on March 7, 2006. The Alliance accepted clarifying questions regarding the final RFP until March 16, 2006. Responses to questions received were posted to the website and, in response to the clarifying questions, minor amendments to the final RFP were posted to the website on March 20 and 24, 2006. The final RFP stated that the deadline for proposal submittals was May 4, 2006.

### 2.4.6.4 Site Proposals Received

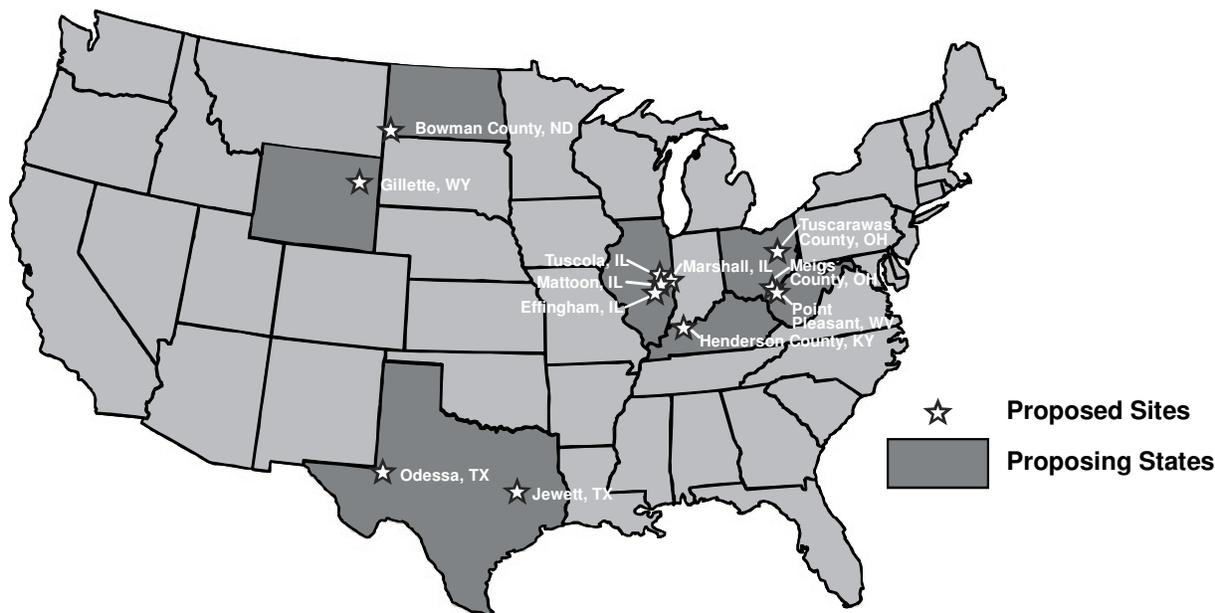
The Alliance received 12 proposals from seven states (see Figure 2-16). The proposals included<sup>1</sup>:

- Illinois – Effingham Site
- Illinois – Marshall Site
- Illinois – Mattoon Site
- Illinois – Tuscola Site
- Kentucky – Henderson County Site
- North Dakota – Bowman County Site
- Ohio – Meigs County Site
- Ohio – Tuscarawas County Site
- Texas – Jewett Site
- Texas – Odessa Site
- West Virginia – Point Pleasant Site
- Wyoming – Gillette Site

After an initial review of the 12 proposals, the Alliance visited each site to verify that the proposals fairly represented the condition at the site.

### 2.4.6.5 Proposal Evaluation

The Alliance Siting Team created two Proposal Evaluation Teams. One team evaluated the proposals based on criteria related to the power plant site, and the other team evaluated the proposals based on criteria related to geologic storage. Both Proposal Evaluation Teams included outside experts. Three outside experts from Sargent & Lundy, L.L.C. assisted with the evaluation of the power plant site proposals. Two outside experts from Lawrence Berkeley National Laboratory and Montana State University assisted with the evaluation of the geologic storage portion of the proposals (FG Alliance, 2006a).



Source: FG Alliance, 2006a

Figure 2-16. Map of Offered Sites

<sup>1</sup> Some site offerors submitted proposals under different titles than shown above. For example, the Jewett Site was submitted for consideration under the title “Heart of Brazos” because it is located within the jurisdiction of both the Heart of Texas and the Brazos Valley Councils of Government. In addition, the Illinois sites (Mattoon and Tuscola) included the landowner’s last name as part of the site name (i.e., Mattoon-Dole and Tuscola-Pflum). For consistency within this EIS, all alternative site locations will be referred to according to the name of the closest city.

### 2.4.6.6 Qualifying Criteria Review

The Evaluation Teams carefully examined each proposal to assess compliance with qualifying criteria. During this review, the Alliance generated clarifying questions for each of the site offerors. The questions were submitted to individual offerors on May 18, 2006, by e-mail. All offerors submitted their responses by the deadline of May 24, 2006 (the original deadline of May 23 was extended by one day at the request of one offeror). After review of the responses to questions, as well as the original proposals, the Evaluation Teams determined that four sites did not satisfy all of the qualifying criteria. The Alliance Board of Directors reviewed this conclusion during conference calls on May 24 and May 30, 2006. After thorough discussions, the Board concurred with the Evaluation Team's conclusions and voted to exclude the four sites from further consideration in the proposal evaluation process.

The four sites that did not meet all of the qualifying criteria were:

- North Dakota – Bowman County Site
- Ohio – Meigs County Site
- West Virginia – Point Pleasant Site
- Wyoming – Gillette Site

Some sites did not qualify based on more than one criterion. The reasons for excluding these four sites were:

- One site was located within 60 miles (96.6 kilometers) of the boundary of a Mandatory Class I Visibility Area. Minimizing or avoiding environmental impacts is a major mission of the FutureGen Project. The 60-mile (96.6-kilometer) distance was selected based on Prevention of Significant Deterioration (PSD) requirements that discourages siting a source of air pollutant emissions within 60 miles (96.6 kilometers) of a Class I visibility area, and the 60-mile (96.6-kilometer) buffer is based on standard industry practice.
- Two sites proposed CO<sub>2</sub> injection wells that would be less than 10 miles (16.1 kilometers) from public access areas (defined as a state park or national park or preserve, national monument, national seashore, national lakeshore, national wildlife refuge, designated wilderness area, designated wild and scenic river, or study area for any of the preceding designations) or sensitive features such as large dams, water reservoirs, hazardous materials storage facilities, and Class I injection wells. Based on the professional judgment of technical experts, the Alliance concluded that a 55-million-ton (50 MMT) CO<sub>2</sub> plume would have a very low probability of migrating 10 miles (16 kilometers) or more from the bottom hole of an injection well. Because this would be a first-of-a-kind demonstration project, 10 miles (16 kilometers) was selected as a conservative safe distance.
- One site had a public access road and a railroad traversing it and thus did not meet the minimum 200 contiguous-acres (81 contiguous-hectares) site requirement. The Alliance based this minimum acreage requirement on the area required for typical power plants, while taking into account the FutureGen Project's need for additional space for multiple coal piles, research facilities, and carbon capture facilities.
- The proposed sequestration reservoir for one site met the definition of an underground source of drinking water because it was specified as having fewer than 0.08 pound *per* gallon (10,000 milligrams *per* liter) total dissolved solids. This criterion was designed to protect current and future sources of drinking water.

### 2.4.6.7 Scoring Criteria Review

For the remaining eight sites that met all qualifying criteria (qualifying sites), each team member individually scored each proposal using the scoring criteria, scales and weights established in advance of

the receipt of the proposals. Each Evaluation Team then conferred and identified areas of difference for further discussion and resolution.

During the period of June 6 through 8, 2006, all Evaluation Team members, including the outside technical experts, met in Richland, Washington, for an internal workshop with members of the Alliance Technical Committee observing the meeting. During this meeting, the Evaluation Team developed and submitted a set of clarifying questions for one site offeror (Illinois-Marshall), and a response was received by the June 12, 2006, deadline set by the Alliance.

The scores for each site were tabulated and a final score was derived for each scoring criterion for each site. Ranked lists of sites for both the power plant and the geologic storage area were generated and combined to develop a ranked list of qualified sites. The summaries for this scoring process are found in the FutureGen Alliance report *Results of Site Offeror Proposal Evaluation* dated July 21, 2006 (FG Alliance, 2006a).

Site visits were conducted in late May 2006. A Site Visit Team made inquiries in the following areas regarding each proposed site during the site visit:

- Coal supply environment/delivery mode flexibility
- Road access
- Distance to rail/barge delivery
- Access to natural gas pipeline
- Cultural resources
- Air dispersion
- Grid proximity
- ROW
- Voltage
- Proximity to public access areas
- Proximity to Tribal lands
- Proximity to proposed target formation(s)
- Physical access to area above geologic storage (e.g., roads)
- Presence of mines, landfills, wells above geologic storage area
- Sensitive receptors over geologic storage area
- Background CO<sub>2</sub> sources

The Site Visit Team presented the results of the site visits to the Proposal Evaluation Teams and members of the Alliance Technical Committee during the Richland internal workshop. The site visits confirmed the information in the proposals, identified some additional information, and were used to inform the Alliance's consideration of the proposals.

#### 2.4.6.8 Best Value Criteria Review

The RFP asked site offerors to submit a narrative discussion regarding several best value criteria. These criteria relate to:

- Land cost
- Availability/quality of existing plant and target formation characterization data
- Land ownership
- Residences or sensitive receptors above target formation
- CO<sub>2</sub> title and indemnification
- Market for H<sub>2</sub>
- Waste recycling and disposal
- Clean Air Act compliance
- Expedited permitting
- Transmission interconnection
- Background CO<sub>2</sub> data
- Power sales
- Other considerations

The responses provided by the site offerors to the best value criteria were summarized and compared. The Alliance Board of Directors reviewed this material and used it, along with the scoring results, to develop the Candidate Site List.

### 2.4.6.9 Candidate Site List

The Alliance concluded that it was imperative for the success of the FutureGen Project that candidate sites offer: (1) an acceptable location for siting a power plant; (2) at least one acceptable geologic storage formation; and (3) minimal risks of schedule delays or project failure. Based on this assessment, the Alliance determined that four of the eight qualified sites met these three requirements. The reasons for screening out the other four qualified sites are discussed below.

Of the eight sites that met all of the qualifying criteria, three scored substantially lower than the others, taking into account the results of both the power plant site and the injection site scoring criteria. Overall, these three sites achieved relatively low scores in the following areas and were excluded from further consideration:

- Proximity to sensitive areas;
- Distance to transmission lines and to transportation for material and fuel delivery;
- Penetrations of secondary seals for the target formation;
- Target formation properties, especially the extent of the plume area and the number of wells needed to meet the injection target;
- Ability to meet monitoring, mitigation, and verification (MM&V) requirements (see Section 2.5.2.2); and
- Additional regulatory requirements that would be imposed.

The Alliance also determined that one of the remaining five top-scoring sites posed substantial problems for construction given its relatively small size and the configuration of the site. Experts in power plant siting concluded that it would be difficult to construct a rail loop for coal delivery at the proposed site. This site was also located close to residential areas, which raised land use compatibility concerns. The net effect of the best value criteria was to weaken the standing of this site after the initial scoring and it was subsequently eliminated from the Candidate Site List (FG Alliance, 2006a).

At the end of the process, the Alliance removed the following qualified sites from consideration based on the application of the scoring and best value criteria under the Alliance's evaluation system:

- Illinois – Effingham
- Illinois – Marshall
- Kentucky – Henderson
- Ohio – Tuscarawas

The remaining four sites made the Candidate Site List. These four sites met all of the qualification criteria and scored highly in the opinion of the Evaluation Team. Furthermore, considering all of the information submitted, including information submitted for the best value criteria and the findings of the Site Visit Team, the Alliance found that these sites offer: (1) an acceptable location for siting a power plant; (2) at least one acceptable geologic storage formation; and (3) minimal risks of schedule delays or project failure. Therefore, the Alliance concluded that 4 of the original 12 sites proposed could be acceptable to host the proposed FutureGen Project and that the sites appear reasonable from a technical, environmental, and economic perspective. Best value criteria would be applied again to information provided by the site offerors during the final selection of a host site, should DOE approve the Proposed Action and more than one alternative site.

At the conclusion of the review of proposals, the Alliance provided DOE with a report (FG Alliance, 2006a) that describes the screening process, the results of the screening process, and identifies the sites that the Alliance concludes are candidates.

DOE reviewed the Alliance's report on the selection process (FG Alliance, 2006a) for fairness, technical accuracy, and compliance with the established approach. DOE concluded that the process met these requirements and determined that the Alliance's Candidate Site List, including the four sites described in Section 2.4, is the appropriate list of reasonable alternative sites for detailed analysis in this EIS.

The reasonable alternative sites are (in no order of preference):

- Mattoon, Illinois
- Tuscola, Illinois
- Jewett, Texas
- Odessa, Texas

## 2.4.7 TECHNOLOGY OPTIONS ELIMINATED FROM FURTHER CONSIDERATION

Pursuant to the President's FutureGen Initiative, DOE determined that all project alternatives must use coal as fuel, produce electricity, produce H<sub>2</sub>, meet very low target emission rates, and capture and store emissions of greenhouse gases (GHGs). Therefore, DOE determined that reasonable alternatives would not include:

- Super-critical pulverized coal power plant technology – By using a single-step complete combustion process (unlike IGCC), these plants cannot produce significant quantities of H<sub>2</sub> without suffering an unreasonably large efficiency penalty when using the produced electricity to generate H<sub>2</sub> (e.g., by electrolysis).
- Integrated gasification fuel cell power plant technology – Project risk levels are too high given that fuel cells are not sufficiently developed at the size required for this project.
- Nuclear power plant technology – These plants do not use coal, which is a low-cost and abundant fuel resource. This option also does not allow an opportunity to demonstrate the capture and storage of GHG emissions.
- Renewable resource technologies (which do not use coal and do not allow an opportunity to demonstrate the capture and storage of GHG emissions including wind power, wave power, geothermal energy, solar energy, and biomass combustion). Other DOE programs and projects aim to further the development of renewable resource technologies as part of DOE's diverse portfolio of energy research, development, and demonstration efforts.
- Energy efficiency improvement technologies (e.g., through conservation and improvements in demand-side efficiency) which do not generate H<sub>2</sub> or electricity from coal. However, increasing energy efficiency does complement the goals of the FutureGen Project to help reduce emissions of CO<sub>2</sub> and other GHGs from coal-fueled energy production.

Many of the technologies eliminated from consideration are addressed by other programs and projects in DOE's diverse portfolio of energy research, development, and demonstration efforts. These technologies, along with increasing energy efficiency, complement the goals of the FutureGen Project to help reduce emissions of CO<sub>2</sub> and other GHGs from coal-fueled energy production.

Geologic sequestration was identified as a reasonable alternative for meeting the requirement of reduced GHG emission. Other sequestration alternatives considered, but eliminated, include:

- Deep ocean sequestration – Deep ocean sequestration is the deliberate injection of captured CO<sub>2</sub> into the ocean at great depths where it could potentially be isolated from the atmosphere for centuries (IPCC, 2005). This technology currently exists; however, the knowledge base is inadequate to determine what biological, physical, or chemical impacts might occur from interactions with the marine ecosystem.

- Terrestrial sequestration – Terrestrial sequestration is the process of atmospheric CO<sub>2</sub> absorption by trees, plants, and crops through photosynthesis and storage as carbon compounds in biomass (tree trunks, branches, foliage, and roots) and soils. While terrestrial sequestration may be an attractive and useful sequestration option, the uncertain long-term accountability and permanence of CO<sub>2</sub> storage and the inability to directly store the CO<sub>2</sub> captured from power plants makes this option unlikely to be implemented in the electrical power industry (NETL, 2007).
- Mineral sequestration – Mineral sequestration is the process of reacting CO<sub>2</sub> with metal oxide-bearing materials (typically minerals like forsterite or serpentine) to form insoluble stable carbonates, with calcium and magnesium being the most commonly used metals (IPCC, 2005). The main challenge for mineral sequestration is developing a commercial process for reaction of the naturally occurring minerals with CO<sub>2</sub> to form carbonates. Even though the reaction is thermodynamically favored, it is extremely slow in nature, and therefore, its economic viability is uncertain (Herzog, 2002).

DOE also considered, but eliminated the alternative of attaching CO<sub>2</sub> capture devices and sequestration facilities to an existing or planned commercial power plant. Such an approach could meet the FutureGen Project's objectives without the cost of planning, designing, and building a new power plant. However, this alternative was eliminated for the following reasons:

- Existing or planned non-IGCC power plants – Almost all non-IGCC power plants are not sufficiently pressurized to reduce the efficiency penalty associated with capture and compression of CO<sub>2</sub>. In addition, these plants cannot produce appreciable quantities of H<sub>2</sub> without suffering an unreasonably large efficiency penalty when using the produced electricity to generate H<sub>2</sub> (e.g., by electrolysis).
- Existing or planned IGCC power plants – Owners of these plants have not volunteered their existing or planned IGCC power plants for the FutureGen Project. Existing plants would not be able to accommodate equipment for pre-combustion capture of CO<sub>2</sub> from synthesis gas without extensive modification, and would not have the necessary features that create a research platform to meet the FutureGen Project's research, development, and demonstration objectives.

Owners of existing and planned power plants, including IGCC plants, would not accept the financial and operational risks associated with adding CO<sub>2</sub> capture devices and experimental geologic sequestration to their plants. Commercial ventures generally cannot accept the intensive testing and interruptions of power generation that would be associated with the research and development activities of the FutureGen Project. Commercial operators are bound by power purchase agreements that are unforgiving of delivery failures, and the power market does not offer much flexibility in negotiating the terms and conditions in these agreements. While the idea of "attaching" the FutureGen Project to an existing or planned IGCC power plant is technically feasible, it is unreasonable from a business perspective.

On April 21, 2003, DOE published a Request for Information in the *Federal Register* (68 FR 19521) openly inviting expressions of interest from organizations capable of implementing the FutureGen Project. Only one qualifying group (the Alliance) submitted an expression of interest. No existing or planned power plant operators offered to modify their plants to achieve the FutureGen Project goals.

To meet the FutureGen Project objectives, DOE requires advancements in the facility's design, experimentation in a near-laboratory setting (including experimentation in a test platform), and operational technology development (at a full-scale and at a reduced scale in available side streams and slip streams). These advancements would be more appropriate for a research platform, such as the FutureGen Project, rather than an existing commercial power plant.

### **2.4.8 PREFERRED ALTERNATIVE**

*DOE's preferred alternative is to provide financial assistance to the FutureGen Project, assuming that one or more sites would be found acceptable in the Record of Decision (ROD). DOE tentatively finds all four sites to be acceptable. If DOE ultimately selects the preferred alternative (to grant financial assistance to implement the FutureGen Project at any of the four sites), DOE would then determine for each site whether mitigation of specified potential impacts would be required. DOE is also free, however, to ultimately determine in the ROD that fewer than all four sites are acceptable, or to select no action.*

## **2.5 THE FUTUREGEN PROJECT**

This section describes specific FutureGen technologies and activities. The FutureGen Project is in the early stages of design and, although the major features of the project are known, many engineering and planning details are still in the developmental stage. The Alliance developed reference design information and bounding conditions for use in this EIS. Where appropriate, design uncertainties and bounding conditions used are indicated in this EIS. As the conceptual design work progresses, the Alliance would make decisions on the incorporation of specific technologies consistent with the overall project goals. Future activities that would be undertaken are described in Section 2.6.

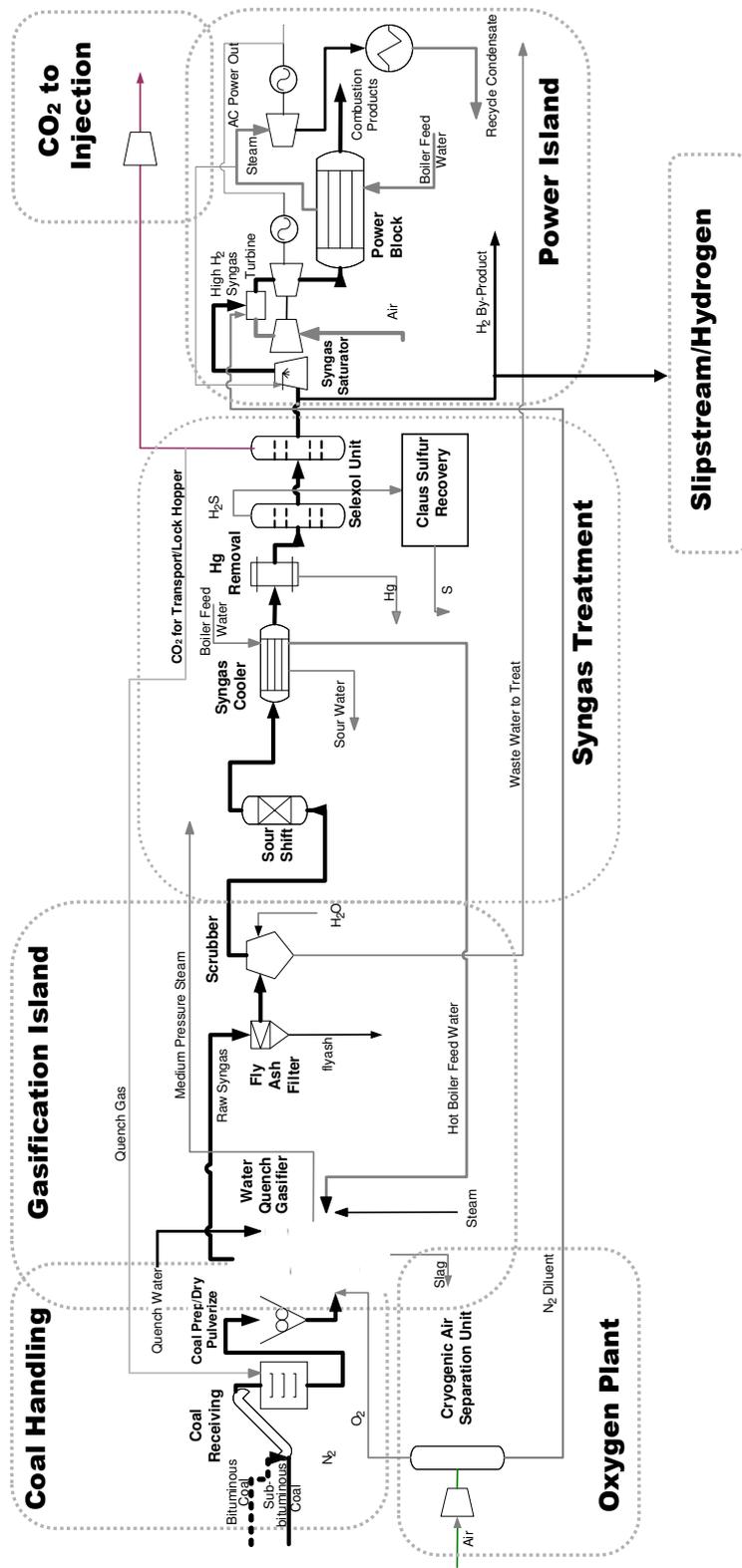
### **2.5.1 POWER PLANT AND RESEARCH FACILITY**

The FutureGen Power Plant would be a 275-MW output IGCC system. The major components of this system are illustrated in Figure 2-17 and an example plant layout is provided in Figure 2-18.

The following sections provide general descriptions of each feature including coal handling equipment, gasifier, syngas cooling, syngas conditioning, combined cycle power system, flare, cooling towers, and the zero liquid discharge (ZLD) system. Because the facility is in the early stages of design, the specific types, makes, and models of equipment have not been determined.

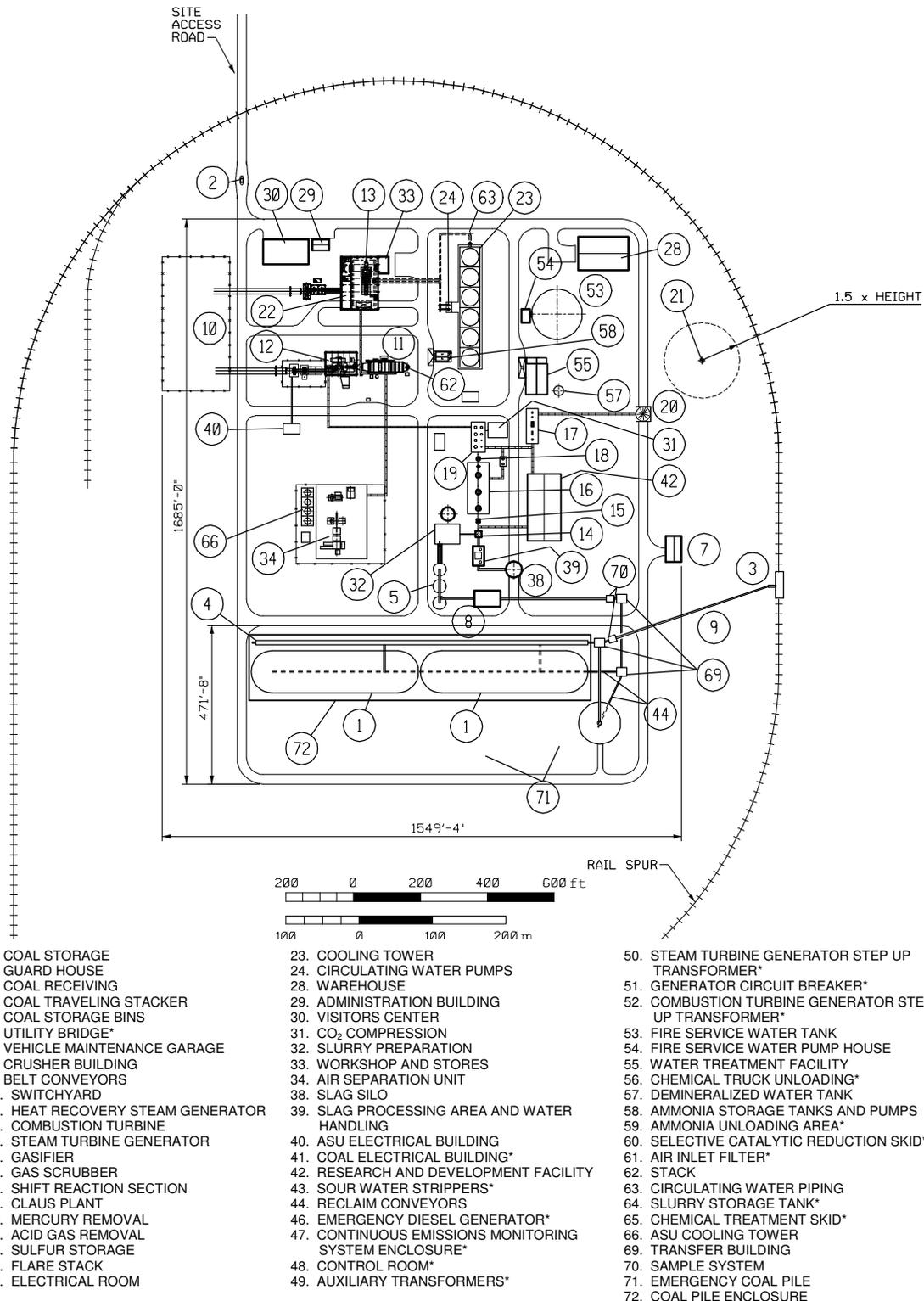
Planned research, development, and demonstration activities (see Figure 2-19) would use all elements of the facility, including the backbone power generation train, an optional side-stream power train (see discussion on Case 3B later in this section), a sub-scale test platform (or test bay), and the CO<sub>2</sub> sequestration facility located outside the power plant. In addition to research and development on power plant technologies, the FutureGen Project could serve as the premier platform for testing and deploying new technologies related to CO<sub>2</sub> storage, retention, and monitoring, and for developing a critical understanding of reservoir structure, chemistry, and performance.

The "backbone" refers to the equipment train necessary to fulfill the major objective of the FutureGen Project (i.e., commercial-scale, power generation with a minimum of 1.1 million tons [1 MMT] of CO<sub>2</sub> captured and stored per year). The facility's test platform and optional side-stream power train would enable full-scale module testing as well as sub-scale testing of new components and systems using syngas, H<sub>2</sub>, or other chemicals produced by the facility. While design and construction of the facilities required to allow such testing to occur are part of the Proposed Action, the use of the test platform would be funded outside the scope of the FutureGen Cooperative Agreement.



AC = Alternating current  
Source: Adapted from FG Alliance, 2007b

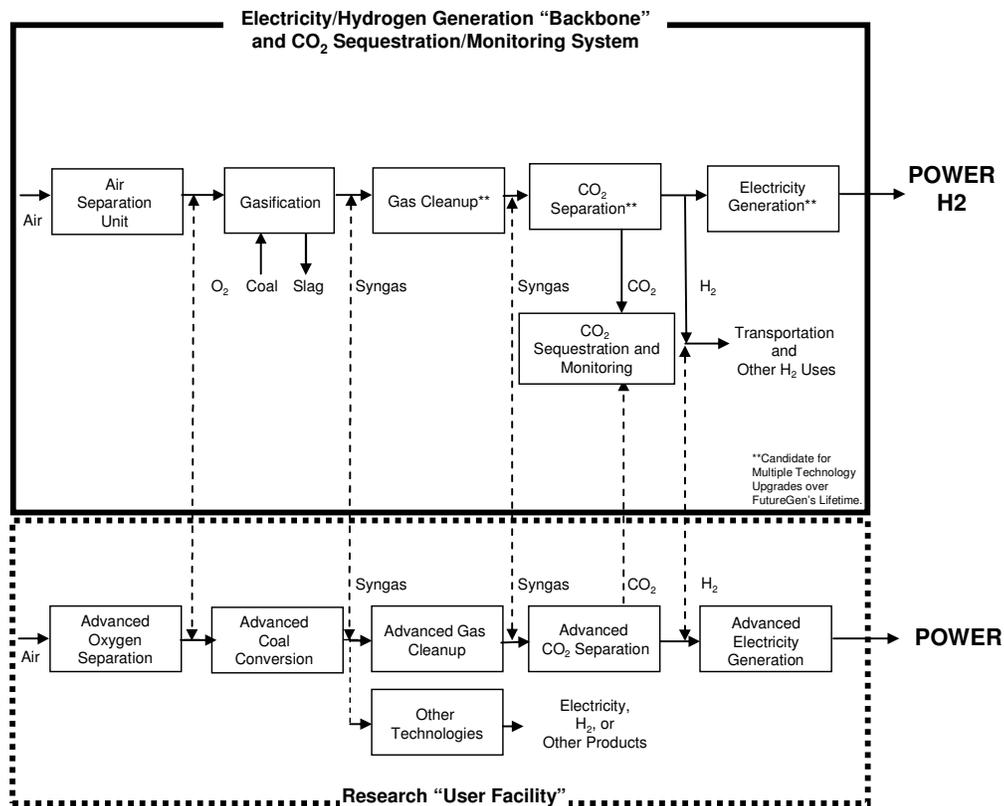
Figure 2-17. Block Diagram of and Example Design for the FutureGen Power Plant



\* = Not shown in figure

Note: Figure is an example of a typical power plant configuration; however, all components of the typical configuration would not be included in the proposed FutureGen facility. Consecutive numbers missing from the legend result from this difference.  
Source: FG Alliance, 2007b

**Figure 2-18. Example FutureGen Project Configuration**



Source: Adapted from FG Alliance, 2007b.

**Figure 2-19. FutureGen Power Plant Overview**

Prototype testing of advanced technologies would be considered in the following areas:

- Fuel Processing Power Plant – Electric power production, H<sub>2</sub> production and carbon capture
  - Coal feed – Tests of high pressure, continuous dry coal feed systems have the potential to reduce equipment cost and improve plant efficiency. Current dry feed systems use lock hoppers, which result in multiple vessels and cyclic operation to achieve continuous feed.
  - Oxygen supply (air separation) – Use of ceramic membrane technology for separating oxygen (O<sub>2</sub>) from air offers the opportunity to reduce capital cost and reduce auxiliary power consumption relative to conventional cryogenic air separation technology.
  - Syngas preconditioning – The syngas composition is shifted to maximize the CO<sub>2</sub> concentration for removal. Advanced technologies are proposed that would allow for shifting the syngas composition and separating the CO<sub>2</sub> in the same unit operation, thus simplifying the process.
  - Syngas cleaning – Particulate, sulfur, halides, alkali, ammonia (NH<sub>3</sub>), mercury (Hg), and other trace metal compounds are removed in the syngas cleaning sub-system. Cleaning can be achieved today with processes operating at low temperature. Advanced technologies are being developed to allow this cleaning to occur at an elevated temperature to retain the water content in the syngas. This results in increased plant efficiency. Lower capital cost also could be possible with these advanced technologies.
  - CO<sub>2</sub> removal/separation – There are many advanced concepts being developed that have the potential to reduce the cost of removing CO<sub>2</sub> from the shifted syngas stream. The CO<sub>2</sub> can be removed by separating CO<sub>2</sub> or H<sub>2</sub>. Advanced technologies include membranes (e.g., ceramic, polymer, metal), solid sorbent materials, and solvents. Technology that operates at elevated

- temperatures can be combined with the advanced syngas cleaning technology to realize benefits in overall plant efficiency.
- Power systems – The electric power is currently generated through the use of gas turbines and steam turbines. Advanced gas turbine technology would allow for increased plant efficiency using H<sub>2</sub> rich fuel and would also be designed to achieve reduced NO<sub>x</sub> emissions. Fuel cells (e.g., solid oxide fuel cells) are being developed that have the potential to increase plant efficiency by incorporating this technology with the turbine technology.
  - Water management – Advances in this area include advanced cooling technology, water recovery, and non-traditional water use for cooling. Examples of benefits include recovery and reuse of heat to improve plant efficiency; use of lower quality water and allowing the wastewater to be concentrated for zero water discharge; recovery of water lost in wet cooling tower plumes for reuse in the plant; and water management concepts to minimize the use of water.
  - Carbon Sequestration
    - Power plant/sequestration integration – The proposed FutureGen Project would allow for operating an integrated plant with power production, H<sub>2</sub> production, carbon capture, and CO<sub>2</sub> sequestration. Advances in process operation and control would be tested and would provide opportunities for advanced sub-system technology.
    - Monitoring and mitigation – The monitoring system is important to verify the injected CO<sub>2</sub> has been sequestered, to track the fate of CO<sub>2</sub> over time, to provide data to confirm predictive models, and to detect leakage of CO<sub>2</sub>. Technology is available to perform these tasks. Advanced technologies will provide opportunities to advance the automation of monitoring and to reduce the cost
    - Reservoir modeling and science – The FutureGen Project would collect extensive data on the fate of CO<sub>2</sub> and the environment containing the CO<sub>2</sub>. These data would enable advances in reservoir modeling and our understanding of the science associated with sequestration phenomena.
    - Sequestration of H<sub>2</sub>S gas with CO<sub>2</sub> co-sequestration – The ability to co-sequester CO<sub>2</sub> and H<sub>2</sub>S provides an opportunity to achieve greater improvements in plant efficiency and reduced capital cost. This facility allows for understanding the potential for this option through analysis and modeling that would determine design and operation requirements to meet project requirements and testing based on these analyses.

The FutureGen Project would also function as a platform for testing and deploying new concepts related to CO<sub>2</sub> storage, monitoring, and leak mitigation. The FutureGen Project would provide an opportunity to develop a critical understanding of reservoir structure, chemistry and performance. A preliminary monitoring scheme and descriptions of these monitoring techniques are discussed in Section 2.5.2.2. The research strategy would be designed to advance the science and engineering of geologic sequestration in the following areas:

- Processes of fluid flow and fluid momentum, conservation of mass, and energy fluxes in complex, heterogeneous porous rock and fractured rock, including large-scale connectivity and flow characteristics;
- Coupled thermal-hydraulic-mechanical-chemical processes and feedbacks;
- Transmission of stresses and impacts of stresses on CO<sub>2</sub> transport and containment;
- Projection of system response over large areas through remote sensing and monitoring, data integration, and reservoir modeling;
- Automated controls linking the power plant to the CO<sub>2</sub> storage reservoir to ensure safe and economical operations;
- Strategies to improve injection or CO<sub>2</sub> trapping; and
- Sequestration of CO<sub>2</sub> with other gases, such as H<sub>2</sub>S with CO<sub>2</sub>.

## Coal Handling Equipment

Coal handling equipment unloads, conveys, prepares, and stores coal delivered to a power plant. The equipment used for an IGCC plant is largely the same as that used at a conventional coal-fueled power plant. The coal is crushed or pulverized before feeding into the gasification system. Some systems dry feed the coal through lock hoppers, while others feed the fuel in a coal-water slurry (Rosenberg et al., 2005). The coal feed method for the FutureGen Project would depend upon the type of gasifier selected by the Alliance (see Table 2-5).

Coal would be transported to the facility by rail (see Section 2.5.5.1). The unloading would be done by a “rapid rail” type unloading system utilizing bottom dump railcars that travel continuously at a slow speed and unload the coal into two receiving hoppers below the rail. Coal would then be withdrawn from each hopper by a single belt feeder. The coal would then be discharged from the belt feeder onto a belt conveyor that includes a belt scale and an “as-received” sample system. The coal would then be conveyed to a transfer tower where it would be directed either to a main storage pile or onto an emergency storage pile (FG Alliance, 2007b). A detailed discussion of unloading and loading activities are discussed in Volume II for each site in Sections 4.14, 5.14, 6.14, and 7.14. Coal would be stored on site in two piles, each providing a 15-day supply, or as one long coal pile of similar size. The coal piles would be either covered or uncovered, depending on operational, environmental, and economic considerations. If covered, the conceptual design allows for the possibility of a Quonset hut-type building for on-site coal storage. Approximate dimensions would be 600 feet (182.9 meters) long by 50 feet (15.2 meters) wide by 75 feet (22.9 meters) high.

## Gasifier

The gasification process would combine coal, O<sub>2</sub>, and steam to produce a H<sub>2</sub>-rich synthesis gas or “syngas.” After exiting the gasifier, the composition of the syngas, predominantly H<sub>2</sub> and CO, would be “shifted” to produce additional H<sub>2</sub>. The product stream would consist mostly of H<sub>2</sub>, steam, and CO<sub>2</sub>. After separation of these three gas components, the H<sub>2</sub> would be used to generate electricity in a gas turbine or fuel cell. A slip stream of H<sub>2</sub> would also be available for use in on-site research and development activities. Steam from the process would be condensed, treated, and recycled into the gasifier or added to the plant’s process water circuit. The separated (i.e., captured) CO<sub>2</sub> would be permanently sequestered.

Gasifiers of the types envisioned for the FutureGen Project operate at high temperatures (2,000 to 3,000°F (1,093°C to 1,649°C) and elevated pressures (400 to 1,000 psi [2,758 to 6,895 kPa]) in the presence of O<sub>2</sub> gas and steam. While performance estimates developed under the conceptual design incorporate technologies that are considered commercial in nature, the actual selection of technologies would occur as a result of an open solicitation. Vendors would be encouraged to propose the most advanced design that fits the requirements and mission of the FutureGen Project.

**Table 2-5. Power Plant Technology Cases under Evaluation for the FutureGen Project**

Process or Component	Case 1	Case 2	Case 3	
			Unit A <sup>1</sup>	Unit B
Combustion Turbine	Frame 7FB	Frame 7FB	Frame 7FB	SGT6-3000
Gasifier Technology	Entrained Flow with Water Quench	Entrained Flow with Water Quench	Entrained Flow with Water Quench	Transport
Oxidant	95 mole percent Oxygen	95 mole percent Oxygen	95 mole percent Oxygen	TBD mole percent Oxygen

**Table 2-5. Power Plant Technology Cases under Evaluation for the FutureGen Project**

Process or Component	Case 1	Case 2	Case 3	
			Unit A <sup>1</sup>	Unit B
ASU	Cryogenic	Cryogenic	Cryogenic	Ion Transport Membrane
Coal	Pittsburgh Illinois PRB	Pittsburgh Illinois PRB	Pittsburgh Illinois PRB	Pittsburgh Illinois PRB
Coal Feed	Slurry	Dry	Slurry	Dry
H <sub>2</sub> S Separation	Physical Solvent 1 <sup>st</sup> Stage	Physical Solvent 1 <sup>st</sup> Stage	Physical Solvent 1 <sup>st</sup> Stage	Chemical Solvent
Sulfur Removal (minimum)	99 percent	99 percent	99 percent	99 percent
Sulfur Recovery	Claus Plant/ Elemental Sulfur			
CO <sub>2</sub> Separation	Physical Solvent 2 <sup>nd</sup> Stage			
CO <sub>2</sub> Capture (minimum)	1 million tpy (0.9 million mtpy), 90 percent	1 million tpy (0.9 million mtpy), 90 percent	1 million tpy (0.9 million mtpy), 90 percent	1 million tpy (0.9 million mtpy), 90 percent
CO <sub>2</sub> Sequestration	Plant Gate, 2200 psig (15,168 kPa)			
H <sub>2</sub> Production	835 lb/h (378.7 kg/h) at 100 percent purity	835 lb/h (378.7 kg/h) at 100 percent purity	835 lb/h (378.7 kg/h) at 100 percent purity	None

<sup>1</sup> Case 3A differs from Case 1 in that its gasifier and coal handling systems were sized for maximum coal feed rates. The larger feed rates would provide enough syngas production to fully load the combustion turbine regardless of the type of coal used.

ASU = air separation unit; TBD = To be determined; tpy = tons per year; mtpy = metric tons per year; psig = pounds per square inch gauge measurement;

kPa = kilopascal; lb/h = pounds per hour; kg/h = kilograms per hour.

Source: FG Alliance, 2007b.

Due to advantages in gas cleanup economics as well as combustion turbine requirements, it is expected that the FutureGen Project would be a high-pressure O<sub>2</sub>-blown facility. O<sub>2</sub>-blown gasification requires supplying a stream of compressed O<sub>2</sub> gas (rather than air) to the gasification reactor. Commercially available O<sub>2</sub> plants, commonly called an air separation unit, operate at very low temperatures (cryogenic). Cryogenic O<sub>2</sub> production is an established commercial process that is used extensively worldwide (Rosenberg et al., 2005). Recent advances in membrane air separation have shown promise, and the Ion Transfer Membrane O<sub>2</sub> system is one advanced technology that has shown merit for inclusion in some capacity at the FutureGen Project.

The FutureGen Project would generate up to 96,865 tons (87,875 metric tons) of slag and ash per year, of which 47,565 tons (43,151 metric tons) would be ash. Slag and ash are residues produced by the combustion of coal. Whether slag is formed depends on the type of gasifier. Gasifiers that operate at temperatures exceeding coal fusion temperature are termed “slagging.” The FutureGen Project is considering both slagging and

**Slag and ash** are residues produced by the combustion of coal. Slag is heat-fused material that accumulates on the sides and bottom of a gasifier and is removed periodically. Ash includes solids produced from the bottom of the gasifier (bottom ash) and solids entrained with the syngas (fly ash). The slag or ash would be recycled for beneficial use or disposed of according to environmental regulations.

non-slugging gasifier options. If a local market exists, the slag or ash would be transported off site to a recycling facility or manufacturer that could recycle it into a beneficial product. Alternatively, the slag or ash could be disposed of off site at a commercial landfill or at an on-site landfill, if one is constructed. The quantity of slag or ash would increase by 49 percent if Case 3B were implemented although this option is considered unlikely.

## Syngas Cooling

Coal gasification systems operate at high temperatures and produce raw, hot syngas. Typically, the syngas is cooled from around 2,000°F (1,093°C) to below 1,000°F (538°C), and the heat is recovered. Cooling is accomplished using a waste heat boiler or a direct quench process that injects either water or cool, recycled syngas into the raw syngas. When a waste heat boiler is used, steam produced in the boiler is typically routed to the heat recovery steam generator (HRSG) to augment steam turbine power generation (Rosenberg et al., 2005).

## Syngas Conditioning

The syngas conditioning process involves removing particulate matter, converting CO in syngas to CO<sub>2</sub> (shifting), and capturing sulfur, and nitrogen, and other chemical compounds from the syngas before it is input to the combustion turbine. Particulate removal is accomplished using either barrier filters or by water scrubbers located downstream of the cooling devices. The particulate matter, including char and fly ash, is typically recycled back to the gasifier. When filters are used, they are cleaned by periodically back-pulsing them with fuel gas to remove trapped material.

CO is shifted by adding steam and flowing the mixture through a selective catalytic reduction process, converting the CO to CO<sub>2</sub> and producing H<sub>2</sub>. Any carbonyl sulfide (COS) in the syngas would be converted to H<sub>2</sub>S and captured downstream. Once filtered and cooled, the syngas is treated in two-stages of cleanup (called acid gas removal [AGR]); the first stage separates H<sub>2</sub>S and mercury (Hg) and the second stage separates the CO<sub>2</sub> and produces a concentrated stream of H<sub>2</sub>. The H<sub>2</sub>S would be diverted to the sulfur recovery unit (SRU). Hg would likely be removed using activated carbon beds.

Current commercial AGR processes are chemical solvent-based processes or physical solvent-based processes. Chemical solvent-based processes use aqueous solutions of amines such as methyl diethanolamine (MDEA) and physical solvent-based processes (such as Selexol™) use dimethyl ethers of polyethylene glycol, or Rectisol™, which uses refrigerated methanol. Polyethylene glycol and methanol are chemically inert and can be regenerated (recycled) through depressurization in a “flash tank” (a unit that separates liquid and gas phases) although additional processing is necessary to remove the H<sub>2</sub>S absorbed by the solvent. Polyethylene glycol and methanol are chemically inert. Under all technology cases (see Table 2-5) except 3B, a physical solvent would be used. Case 3B would use an amine solution.

Sulfur recovery processes recover sulfur in the form of either sulfuric acid or elemental sulfur. The most common removal system for sulfur recovery is the Claus process, which produces marketable elemental sulfur from the H<sub>2</sub>S in the syngas (Rosenberg et al., 2005). The preliminary concept for the FutureGen Project assumes use of a Claus process.

The **Claus process** recovers elemental sulfur from gaseous H<sub>2</sub>S. It is a multi-step thermal and catalytic process where the final step involves oxidation of H<sub>2</sub>S. The main reaction equation is:  
$$2\text{H}_2\text{S} + \text{O}_2 \rightarrow 2\text{S} + 2\text{H}_2\text{O}$$

## Combined Cycle Power System

After cleanup, the concentrated H<sub>2</sub> stream flows to the combined cycle power system. In a combined cycle system, the first cycle involves the combustion of the primary fuel, H<sub>2</sub>, in the case of the FutureGen

Project, in a combustion turbine. The combustion turbine powers an electric generator. It also may compress air for the ASU or gasifier. Hot exhaust gases are captured and directed to an HRSG, which produces steam. For the second cycle, the steam drives a steam turbine to produce additional electricity. The two electricity generation systems, one with a combustion turbine and the other with a steam turbine, constitute the combined cycle power system and generate more electricity than the older conventional systems that only use a steam turbine.

## Flare

The FutureGen Project would be equipped with a flare to combust syngas during normal startups resulting in unplanned restart emissions and during plant upsets (also called unplanned outages). The flare would have a single stack and a single flame. The stack height would be up to 250 feet (76.2 meters) high, and the flare would be designed for a minimum 99 percent destruction efficiency of CO and H<sub>2</sub>S.

**Plant upset** is a serious malfunction of any part of the IGCC process train and usually results in a sudden shutdown of the combined-cycle unit's gas turbine and other plant components.

## Cooling Towers

The FutureGen Project would likely include a hybrid cooling system to reduce water usage, consisting of a mechanical draft cooling tower combined with a convective heat removal system. Most of the water appropriated for the power plant would be consumed by evaporative cooling. The amount of water required would be influenced by many factors including: ambient weather conditions; the cycles of concentration in the cooling towers; and the quality of the make-up water source. In general, if the source water is relatively low in total dissolved solids, the cycles of concentration in the cooling towers can be increased, resulting in less water consumption.

## Zero Liquid Discharge System

The FutureGen Project would use a ZLD system to eliminate industrial wastewater discharges. Cooling tower blowdown (i.e., water removed from the cooling system) *and other process water streams* would be routed to the ZLD system to remove solids and dissolved constituents before reuse in the cooling tower. The ZLD process would first remove suspended solids in a clarifier, concentrate the dissolved solids using a reverse osmosis system, and then remove water from the dissolved solids through heating and vaporization. The ZLD process results in a solid filter cake material, which would be collected and transported off site for proper disposal. Based on the conceptual design estimates, up to 1,545 tons (1,402 metric tons) of clarifier sludge and 5,558 tons (5,043 metric tons) of solids (filter cake) would be generated by the ZLD system per year of operation.

**ZLD system** is a process involving the separation of solids and dissolved constituents from the plant wastewater and allowing the treated water to be recycled or reused in the industrial process, resulting in no discharge of process wastewater to the environment.

### 2.5.1.1 Technology Options and Bounding Conditions

To support this EIS, the Alliance in consultation with DOE developed an initial conceptual design, which includes reference information for use in the impact analyses of this EIS. To develop bounding conditions, a range of outputs was developed based on the three technology cases summarized in Table 2-5. To provide a conservative assessment of impacts, the assumptions and quantities (particularly air emissions, other waste streams, and land impacts) relate to the upper bound of the range of possible impacts. For example, the upper bound for air emissions was derived by assuming facility operations would result in the highest emission rate of individual pollutant species (e.g., NO<sub>x</sub>) selected from among

all three cases. Therefore, while used to develop the performance boundary, the aggregate upper bound is worse than any single technology case under consideration.

An important part of the FutureGen Project is to incorporate the latest technologies ready for full-scale or sub-scale testing or commercial deployment. To identify technology options, the Alliance started with a list of major components and subsystems of the power plant facility and created a matrix of potential configurations of equipment. After presentations by various technology vendors and with assistance from numerous power plant experts, the matrix of potential configurations was narrowed to three to support the conceptual design. While the final technology selections have not yet been made, the IGCC processes would be generically similar, regardless of specific technologies.

The Alliance is evaluating three potential technology cases. These cases share many components and processes in common, with the primary difference being the type of gasifier technology used. Table 2-5 summarizes the technology cases and their components. Cases 1, 2, and 3A are stand-alone alternatives that are capable of meeting the design requirements of the project. Case 3B is a smaller, side-stream power train that would enable more research and development activities than the main train of the power plant (Cases 1, 2, and 3A). Case 3B, if implemented, would be paired with Cases 1 and 2, and 3A. Case 3A is similar to Case 1, except the gasifier output is greater.

One goal of the FutureGen Project is to demonstrate gasification technology over a range of different coal types. Therefore, the facility would be designed to use bituminous, sub-bituminous, and *possibly* lignite coals. For developing the performance boundary, the Alliance assumed technology cases and operation of the plant using three coal types: PRB sub-bituminous, Illinois Basin bituminous, and Northern Appalachia Pittsburgh bituminous.

The Alliance estimated the operating parameters for a bounding combination of the technologies and coal types. Emissions of air pollutants, quantities of coal and process chemicals, and waste generation were calculated *as* the maximum possible under Cases 1, 2, and 3A for the three coal types, plus the maximum possible under Case 3B for the three coal types. This resulted in conservative estimates of possible air emissions and impacts related to use of process materials, waste management, and the associated transportation.

***The FutureGen plant may not be designed optimally for any fuel type to either maximize efficiency in energy conversion or minimize pollutant emissions. Furthermore, because the plant would be designed to accommodate a variety of research and development (R&D) applications that may be proposed in the future, plant components would be integrated loosely such that the power plant as a whole may not perform optimally from an energy conversion perspective.***

The FutureGen Project would have a sophisticated control system to safely manage normal operations as well as planned and unplanned restarts. Unplanned events include situations where a specific component or system has a performance problem and actions are required to restore normal operations or shut down the plant. Unplanned events may involve such actions as venting syngas to a flare for a short period (hours). Air emissions during startups and unplanned events (upset conditions) tend to be very high in pollutants emitted relative to normal operations, but occur for short durations (minutes to hours). For purposes of estimating the upper bound of air emissions, the air emissions profile used in this EIS includes an estimated number of unplanned restarts. Therefore, the air emissions profile would be greater than anticipated from steady-state operation of the project. Details on the air emissions estimates and assumptions are provided in Section 2.5.6.1. Even with including all unplanned restarts, the FutureGen Project is still expected to have low air emission levels when compared to traditional coal combustion power plants. As is the case with any new technology, the anticipated number of unplanned restarts usually declines with experience.

The FutureGen Project would also conduct research on additional technologies, which were described in Section 2.5.1. After the 4-year initial testing and research phase, it is likely that the power plant could still be used for additional research activities and would gradually over time be operated as a commercial power plant. Additionally, the Alliance could undertake various activities that would help offset the cost of operation. These activities include selling some or all of the CO<sub>2</sub> for enhanced oil recovery (EOR) or enhanced coalbed methane recovery, removing the Claus plant and co-sequestering H<sub>2</sub>S with the CO<sub>2</sub>, and possibly selling a portion of the H<sub>2</sub>. These other operating scenarios are discussed in Section 3.3.

## 2.5.2 CARBON SEQUESTRATION

### 2.5.2.1 Overview of CO<sub>2</sub> Capture and Geologic Sequestration

A key component of the FutureGen Project is the geologic sequestration of CO<sub>2</sub> to help achieve near-zero emissions. Geologic sequestration is the storage of CO<sub>2</sub> in a suitable subsurface formation with the capability to contain it permanently. The injection of gases underground is not a new concept and has been performed successfully for decades, including natural gas storage projects around the world and acid gas injection at EOR projects.

Geologic storage of anthropogenic (man-made) CO<sub>2</sub> as a GHG mitigation option was first proposed in the 1970s, but little research was done until the early 1990s. In a little over a decade, geologic storage of CO<sub>2</sub> has grown from a concept of limited interest to one that is quite widely regarded as a potentially important mitigation option. Technologies that have been developed for and applied by the oil and gas industry can be used for the injection of CO<sub>2</sub> in deep geologic formations. Well-drilling technology, injection technology, computer simulation of reservoir dynamics, and monitoring methods can potentially be adapted from existing applications to meet the needs of geologic storage (IPCC, 2005).

Types of geologic formations capable of storing CO<sub>2</sub> include oil and gas bearing formations, saline formations, basalts, deep coal seams, and oil- or gas-rich shales. Not all geologic formations are suitable for CO<sub>2</sub> storage; some are too shallow and others have low permeability (the ability of rock to transmit fluids through pore spaces) or poor confining characteristics. Formations suitable for CO<sub>2</sub> storage have specific characteristics such as thick accumulations of sediments or rock layers, permeable layers saturated with saline water (saline formations), extensive covers of low permeability sediments or rocks acting as seals, (caprock), structural simplicity, and lack of transmissive faults (IPCC, 2005). **DOE recommends that interested readers on this topic also see the Carbon Sequestration Atlas of the United States and Canada at [http://www.netl.doe.gov/publications/carbon\\_seq/refshelf/atlas/index.html](http://www.netl.doe.gov/publications/carbon_seq/refshelf/atlas/index.html).**

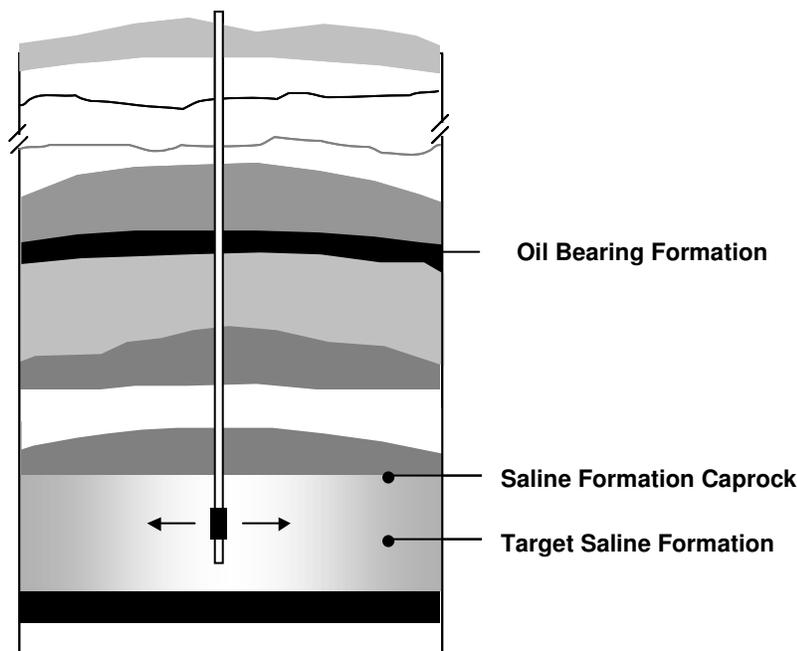
**Geologic Sequestration** is the placement of CO<sub>2</sub> or other GHGs into subsurface porous and permeable rocks in such a way that they remain permanently stored.

**Deep Saline Formation** is an underground rock formation, generally more than 0.45 mile (731 meters) beneath the ground surface, composed of permeable materials and containing highly saline water.

Under the FutureGen Project, CO<sub>2</sub> from the power plant would be captured, transported by pipeline (if necessary), and injected into a deep saline formation (see Figure 2-20). The deep saline formation would be overlain by several other formations, including one or more low permeability caprock layers. Deep saline formations are the focus of the FutureGen Project because they are believed to have the largest capacity for CO<sub>2</sub> storage and are much more widespread geographically than other geologic sequestration options.

Improving the fundamental understanding of the transportation and geologic sequestration of large quantities of CO<sub>2</sub> is critical to advancing the commercial feasibility of this technology. This understanding is also important to public acceptance of this technology. The FutureGen Project would

conduct subsurface research related to geologic storage of CO<sub>2</sub>, and would function as a platform for testing and deploying new technologies related to CO<sub>2</sub> storage, monitoring, and, perhaps, leak mitigation. The project would help to develop a critical understanding for planners, engineers, and scientists to understand CO<sub>2</sub> sequestration in the context of formation structure, chemistry, and performance.



**Figure 2-20. Geologic Sequestration in a Deep Saline Aquifer**

Depending on the choice of monitoring technologies versus the length and costs for the pipelines, monitoring could be the most costly single component of the CO<sub>2</sub> storage effort because of the infrastructure required (e.g., deep monitoring wells) as a research and development project. The FutureGen Project would represent a first-of-a-kind environment in which to evaluate combinations of existing and new monitoring techniques and to determine the efficacy and cost of providing quantitative data on the location of the CO<sub>2</sub> plume, seal integrity, and early warning of CO<sub>2</sub> seepage. It is envisioned that the FutureGen Project would identify and validate less expensive and less invasive geologic sequestration technologies that could be used in future commercial applications (FG Alliance, 2007b).

## CO<sub>2</sub> Capture

CO<sub>2</sub> capture from an IGCC power plant is generally less costly than capture from a conventional coal-fueled power plant because the CO<sub>2</sub> is relatively concentrated (50 volume percent) and at high pressure. The FutureGen Project would capture and remove CO<sub>2</sub> during the second stage of syngas cleanup using a physical solvent, before the syngas is mixed with air and burned in a combustion turbine.

## CO<sub>2</sub> Compression and Transport

A CO<sub>2</sub> pipeline would transport the gas to one or more injection wells at the sequestration site. For three of the four alternative sites, injection wells would be miles away from the power plant site, requiring the construction of varying lengths of CO<sub>2</sub> pipeline. Depending upon the site selected, the Alliance would

contract with a pipeline company or operator to use an existing CO<sub>2</sub> pipeline or to construct a new pipeline.

To deliver the captured CO<sub>2</sub> to the injection site, the gas would be compressed into a supercritical state (i.e., exhibiting properties of both a liquid and a gas) to make it more efficient to transport. CO<sub>2</sub> compression uses the same equipment as natural gas compression, with some modifications to suit the properties of CO<sub>2</sub>. Avoiding corrosion and hydrate formation are the main pipeline operational issues with CO<sub>2</sub>. Multi-stage centrifugal compressors are preferred for large volume, high-pressure applications because of their ability to handle large flow rates (several hundred thousands cubic feet per minute).

The water content in the CO<sub>2</sub> stream must be strictly limited to prevent corrosion. A glycol dehydrator can be used for this purpose. To avoid potential heat exchanger problems, stainless steel can be used throughout the compressor piping if H<sub>2</sub>S is present in the CO<sub>2</sub> stream. Special sealing materials and gaskets are used to avoid hardening of some petroleum-based and synthetic lubricants in compressors and pipelines. Other impurities in the captured CO<sub>2</sub> streams (*e.g., argon, H<sub>2</sub>O, nitrogen, and O<sub>2</sub>*) may also affect the compressor and pipeline operations. Their impact is currently being researched (Wong, 2005). Once compressed, the CO<sub>2</sub> would be conveyed by pipeline to the sequestration site.

Approximately 1,500 miles (2,500 kilometers) of CO<sub>2</sub> pipelines exist in the United States. CO<sub>2</sub> pipelines are regulated as hazardous liquids pipelines. The U.S. Department of Transportation's CO<sub>2</sub> Pipeline and Hazardous Materials Safety Administration has responsibility for safe and secure movement of hazardous materials to industry and consumers by all transportation modes, including the Nation's pipelines. Ordinarily, federal approval is not required for development of a new hazardous liquids pipeline unless it would cross federal lands. Generally, state and local laws regulate construction of new hazardous liquids pipelines. However, under federal and state regulations, pipeline operators are responsible for ensuring the safe operation of their pipelines. Operators must use qualified materials and sound construction practices; thoroughly inspect, test, maintain, and repair their pipelines; ensure their workers are trained and qualified; implement BMPs to prevent damage to pipelines; and develop adequate risk management and emergency response plans. A Computational Pipeline Monitoring System is required by federal regulation (49 CFR Section 195.444) for leak detection in CO<sub>2</sub> pipelines. This type of leak detection system automatically alerts the operator when a leak occurs so that appropriate actions can be taken to minimize the release.

Most pipelines for hazardous liquids are located or buried within ROWs. A ROW consists of consecutive property easements acquired by, or granted to, the pipeline company. The ROW provides sufficient space to perform pipeline maintenance and inspections, as well as a clear zone where encroachments can be monitored and prevented. If an existing utility ROW is not available or suitable for the proposed CO<sub>2</sub> pipeline for the FutureGen Project, either the Site Proponents or the Alliance would obtain a new ROW.

The diameter of the pipeline would depend on many factors, particularly the length of the pipeline and transport pressure. For the FutureGen Project, the pipeline would be buried at least 3 feet (0.9 meter) below the surface except where it is necessary to come to the surface for valves and metering. Although valve spacing has not been determined at this time, a typical distance between metering stations is 5 miles (8 kilometers). These features may be aboveground or could be located below ground in concrete vaults. The pipeline would require protection from above ground loading at road crossings, either by increased wall thickness or by casing the pipe. In cold climates, transporting warm CO<sub>2</sub> could increase the ground temperature, which may affect ground frost and freeze in the winter. To avoid problems with icing at road crossings, the pipeline depth or pipe insulation thickness may be increased or the pipe can be armored.

## CO<sub>2</sub> Injection and Storage

An objective of the FutureGen Project is to inject between 1.1 and 2.8 million tons (1 and 2.5 MMT) per year of CO<sub>2</sub> into a deep saline reservoir, providing permanent storage of the CO<sub>2</sub> underground. Most likely, all captured CO<sub>2</sub> would be stored in deep saline reservoirs; however, the goal is to sequester at least 1.1 million tons (1 MMT) of CO<sub>2</sub> per year in deep saline reservoirs. It is possible that CO<sub>2</sub> captured in excess of 1.1 million tons (1 MMT) per year would be sold for use in EOR or coalbed methane recovery. If any excess CO<sub>2</sub> is sold, DOE anticipates that the Alliance would restrict the uses of the CO<sub>2</sub> as a condition of the sales agreement so that the sequestration is permanent.

Assuming a 1.1 million ton (1 MMT) per year CO<sub>2</sub> injection rate and a 50-year power plant life span, the target formation could receive up to 55 million tons (50 MMT) of CO<sub>2</sub>. The CO<sub>2</sub> gas would be injected at a pressure of approximately 2,200 psig (15,168 kPa). The number of injection wells required to meet the injection goal would vary, depending on the characteristics of the target formation. In addition, the Alliance may install one or more backup injection wells to accommodate periods of time for routine maintenance and inspection of the primary injection well(s). Where necessary, one or more extraction wells would be installed to remove formation water and thereby decrease the risk of over-pressurization caused by the injection of CO<sub>2</sub>.

The alternative sites identified by the Alliance met stringent screening criteria with regard to their proposed injection sites. The Alliance, working in coordination with nationally recognized scientists and engineers, developed screening criteria that ensure that proposed formations provided not only adequate storage capacity but also exhibited features that would secure lasting, safe storage of CO<sub>2</sub>. Some of these criteria are:

- The proposed target formation must have a primary seal (caprock) capable of long-term containment of the injected CO<sub>2</sub>. Although “long-term” was not defined, the Alliance believed the criteria would provide secure and lasting storage of CO<sub>2</sub>. Figure 2-20 shows an illustration of geologic sequestration depicting layers of caprock.
- The primary seal must have sufficient thickness (greater than 20 feet [6 meters]), be regionally extensive, and be continuous over the entire projected CO<sub>2</sub> plume area after injection of 55 million tons (50 MMT) of CO<sub>2</sub>.
- The primary seal must also have sufficiently low vertical permeability and have sufficiently high capillary entry pressure to provide a barrier to the migration of CO<sub>2</sub> out of the target formation.
- The proposed target formation(s) must not be an underground source of drinking water.
- The offeror must own or have a demonstrated ability to obtain, purchase, or obtain a waiver of subsurface mineral rights within and immediately adjacent to proposed target formation(s) to accommodate an injection capacity of 55 million tons (50 MMT) of CO<sub>2</sub>.
- In addition to the required total storage capacity of the site, the proposed target formation(s) also must support a minimum CO<sub>2</sub> injection rate goal of 1.1 million tons (1 MMT) of CO<sub>2</sub> per year for up to 50 years.
- The proposed target formation(s) must not intersect marine shorelines or other major surface bodies of water. The bottomhole location of any injection well must be no closer than 10 miles (16 kilometers) to marine shorelines and major surface water bodies.
- Land above the proposed target formation(s) must not intersect large dams, water reservoirs, hazardous materials storage facilities, Class 1 injection wells, or other sensitive features. The bottomhole location of any injection well must be no closer than 10 miles (16 kilometers) to any sensitive feature.
- The primary seal must not be intersected by any known historically active or hydraulically transmissive faults.
- The proposed power plant site must have low risk from significant seismic events.

- The land above the proposed target formation(s) must not be on a public access area. The bottomhole location of any injection well must be no closer than 10 miles (16 kilometers) from any public access area (FG Alliance, 2006a).

The underground injection of CO<sub>2</sub> would be regulated under the U.S. Environmental Protection Agency's (EPA's) Underground Injection Control (UIC) Program. The UIC Program works with state and local governments to oversee underground injection of waste in an effort to prevent contamination of drinking water resources. All injection wells require authorization under general rules or specific permits. Many states, including Illinois and Texas, have primary enforcement responsibility (primacy) for the UIC Program. It is likely that the FutureGen Project CO<sub>2</sub> injection wells would be treated as Class V (experimental) wells under the UIC Program. *Additionally, extracted salt water (brine) would be reinjected underground through Class I disposal wells, unless the brine is used in association with oil or natural gas production where Class II wells could be used.*

## Fate and Transport of Injected CO<sub>2</sub>

Injection of CO<sub>2</sub> in its supercritical state into a deep geologic formation would be achieved by pumping the CO<sub>2</sub> down an injection well. The injected CO<sub>2</sub> would displace the existing saline water occupying the formation's pore space. Without this displacement, CO<sub>2</sub> could only be injected by increasing the formation's fluid pressure, which could result in formation fracturing. If a formation's fluid pressure is too high, the sequestration process may require installation of extraction wells that remove water from the formation.

To increase the storage potential, CO<sub>2</sub> would be injected into deep formations where it could maintain its dense supercritical state. The fate and transport of CO<sub>2</sub> in the formation would be influenced by the injection pressure, dissolution in the formation water, and upward migration due to CO<sub>2</sub>'s buoyancy.

Injection would raise the fluid pressure near the well allowing CO<sub>2</sub> to enter the pore spaces initially occupied by the saline water within the formation. Once injected, the spread of CO<sub>2</sub> would be governed by the following primary flow, transport and trapping mechanisms:

- Fluid flow (migration) in response to pressure gradients created by the injection process;
- Fluid flow (migration) in response to natural groundwater flow;
- Buoyancy caused by the density differences between CO<sub>2</sub> and the groundwater;
- Diffusion;
- Dispersion and fingering (localized channeling) caused by formation heterogeneities and mobility contrast between CO<sub>2</sub> and the groundwater;
- Dissolution into the formation groundwater or brine;
- Mineralization;
- Pore space trapping; and
- Adsorption of CO<sub>2</sub> onto organic material.

**Dissolution** is the process of a liquid dissolving into another liquid.

**Miscible** refers to the property of liquids that allows them to be mixed together and form a single homogeneous phase.

The magnitude of the buoyancy forces that drive vertical flow depends on the type of fluid in the formation. When CO<sub>2</sub> is injected into a deep saline formation in a liquid or liquid-like supercritical dense phase, it is only somewhat miscible in water. Because supercritical CO<sub>2</sub> is much less viscous than water (by an order of magnitude or more), it would be more mobile and could migrate at a faster rate than the saline groundwater. In saline formations, the comparatively large density difference (30 to 50 percent) creates strong buoyancy forces that could drive CO<sub>2</sub> upwards.

To provide secure storage (e.g., structural trapping), a low permeability layer (caprock) would act as a barrier and cause the buoyant CO<sub>2</sub> to spread laterally, filling any stratigraphic or structural trap it encounters. As CO<sub>2</sub> migrates through the formation, it would slowly dissolve in the formation water. In systems with slowly flowing water, reservoir-scale numerical simulations show that, over tens of years, up to 30 percent of the injected CO<sub>2</sub> would dissolve in formation water. Larger basin-scale simulations suggest that, over centuries, the entire CO<sub>2</sub> plume would dissolve in formation water. Once CO<sub>2</sub> is dissolved in the formation water, it would no longer exist as a separate phase (thereby eliminating the buoyant forces that drive it upwards), and it would be expected to migrate along with the regional groundwater flow.

As migration through a formation occurs, some of the CO<sub>2</sub> would likely be retained in the pore space, commonly referred to as “residual CO<sub>2</sub> trapping.” Residual trapping could immobilize large amounts of the CO<sub>2</sub>. While this effect is formation-specific, researchers estimate that 15 to 25 percent of injected CO<sub>2</sub> could be trapped in pore spaces, although over time much of the trapped CO<sub>2</sub> dissolves in the formation water (referred to as “dissolution trapping”). The dissolved CO<sub>2</sub> would make the formation water more acidic, with pH dropping as low as 3.5, which would be expected to dissolve some mineral grains and mineral cements in the rock, accompanied by a rise in the pH of the formation water. At that point, some fraction of the CO<sub>2</sub> may be converted to stable carbonate minerals (mineral trapping), the most permanent form of geologic storage. Mineral trapping is believed to be comparatively slow, taking hundreds or thousands of years to occur (IPCC, 2005).

**Supercritical CO<sub>2</sub> - CO<sub>2</sub>** usually behaves as a gas in air or as a solid in dry ice. If the temperature and pressure are both increased (above its supercritical temperature of 88°F [31.1°C] and 73 atmospheres [1,073 psi]), it can adopt properties midway between a gas and a liquid, such that it expands to fill its container like a gas, but has a density like that of a liquid.

To ensure the safe storage of sequestered CO<sub>2</sub>, a monitoring and mitigation strategy would be implemented. The purposes of monitoring include assessing the integrity of plugged or abandoned wells in the region; calibrating and confirming performance assessment models; establishing baseline parameters for the storage site to ensure that CO<sub>2</sub>-induced changes are recognized; detecting microseismicity associated with the storage project; measuring surface fluxes of CO<sub>2</sub>; and designing and monitoring remediation activities. During the DOE-sponsored activities, a suite of monitoring approaches would be used to verify the safe containment of the CO<sub>2</sub> in the formation. Potential monitoring methods are described in Section 2.5.2.2.

## Potential Leakage Pathways

A leading concern regarding geologic sequestration is the potential leakage of sequestered CO<sub>2</sub> from underground formations into the atmosphere or into an ***underground source of drinking water***. The mechanisms for leakage are highly dependent on the storage formation’s geologic conditions. Pathways and mechanisms for leakage can include:

- Failure of seals near the borehole (due to corrosion of the formation rock, the casing, or the cement between the casing and the formation);
- Leakage through abandoned boreholes and wells;
- Migration of CO<sub>2</sub> through the caprock formation due to its innate permeability;
- Failure of the caprock by formation stress and fluid pressure changes from injection; and
- Failure of the caprock by external forces such as tectonic movement, stress caused by subsidence, or earthquakes.

Overall, the main risks of leakage of geologically sequestered CO<sub>2</sub> are due to well borehole leakage and caprock failure. Under the Proposed Action, ***perhaps in connection with the Area of Review requirements for a UIC permit***, the Alliance would identify, plug and abandon (***as indicated by the State***

or **Federal UIC Director**) existing unused wells and boreholes that penetrate the primary seals of the injection reservoir. The Alliance conducted a search for such wells at each of the sites and their presence relative to the storage formation was addressed in the Risk Assessment (TetraTech, 2007) that was prepared in support of this EIS. Risks associated with other leakage pathways, such as migration through caprock and failures caused by external forces are expected to be small because the alternative sites have met the geologic and seismic criteria developed for the FutureGen Project.

Pathways that could be created through the execution of the project, such as failures of the injection well casing or caprock failure due to injection pressure, could be avoided or minimized through preparatory and operational measures (see Section 2.5.2.2). The risk assessment prepared for this EIS considers potential leakage scenarios from the subsurface and estimates the risks to groundwater quality, biota, and humans (see Section 2.5.4).

## Reservoir Modeling of Injected CO<sub>2</sub>

Predictions of the distribution of CO<sub>2</sub> injected into the saline formations at the alternative sites were made using numerical simulation performed at DOE's Pacific Northwest National Laboratory (PNNL). This simulation involves the solution of mathematical equations that describe the migration and properties of CO<sub>2</sub> as it is injected into the subsurface. The flow and transport equations address parameters such as viscosity, solubility, relative permeability, and density. For numerical simulations performed for the proposed injection of CO<sub>2</sub>, the Alliance used a model called Subsurface Transport Over Multiple Phases (STOMP), which was developed at PNNL. The model is a general-purpose tool for simulating subsurface flow and transport and addresses a variety of subsurface environments and flow mechanisms. Since its creation, the STOMP program has been validated by comparing its results against laboratory-scale experiments and field-scale demonstrations. PNNL used the STOMP-CO<sub>2</sub> version of the model to simulate the CO<sub>2</sub> injection and dispersion at the sites.

Each alternative Site Proponent provided PNNL and the Alliance a data package containing detailed information on the geological, geochemical, hydrological, tectonic, and other physical properties of the planned injection site's subsurface environment. Where information from a third-party source was used, the source was documented to ensure traceability. Much of the subsurface data for the sites were provided by state or university sources (e.g., Bureau of Economic Geology [University of Texas], Illinois State Geologic Survey).

An important component of executing a numerical simulator is documenting the sources of inputs and cataloging the results. PNNL created a FutureGen Application Log to maintain these records to allow external reviewers to understand the data path from the site-specific data to the simulator inputs and allow the simulations to be replicated in the future.

Two scenarios were considered as representing reasonable bounds on the expected CO<sub>2</sub> output and sequestration operations for the FutureGen Project. Although CO<sub>2</sub> output depends on many factors, such as the coal type being gasified, the probable upper bound would be 7,551 tons (6,850 metric tons) per day, which results in an annual injection rate of 2.8 million tons (2.5 MMT) per year (assuming 100 percent

**Viscosity** is a material's resistance to flow.

**Solubility** is the ability or tendency of one substance to dissolve into another at a given temperature and pressure.

**Permeability** indicates the rate at which fluids would flow through the subsurface and reflects the degree to which pore space is connected.

**Density** is the ratio of the weight of a substance relative to its volume.

**STOMP** model documentation and information can be found at:

- [http://www.netl.doe.gov/publications/proceedings/01/carbon\\_seq/p36.pdf](http://www.netl.doe.gov/publications/proceedings/01/carbon_seq/p36.pdf)
- <http://www.princeton.edu/~cmi/events/Workshop%20Summary%202005.pdf>

operation over an entire year). Therefore, the first scenario modeled assumed this maximum injection case. A second case analyzed a constant injection rate of 1.1 million tons (1 MMT) per year, corresponding to the minimum rate of sequestration to be met over the first 4-year operating period. For both scenarios, a total of 55 million tons (50 MMT) of CO<sub>2</sub> would be injected into the target formation. This maximum quantity is based on the requirement set forth in the RFP for candidate sites.

To achieve an injection target of 55 million tons (50 MMT) of CO<sub>2</sub>, an injection period of 20 years was used for the 2.8 million tons (2.5 MMT) per year scenario, and an injection period of 50 years was used for the 1.1 million tons (1 MMT) per year scenario. However, the reservoir model was run for 50 years in both cases. For all the sites except Jewett, the largest plume radius predicted by the numerical modeling was associated with the injection of 1 MMT for 50 years. As a result of the modeling, it is estimated that the largest plume radius at Jewett would be associated with the injection of 2.8 million tons (2.5 MMT) for 20 years, followed by 30 years of gradual plume spreading. These differences in plume size are due to site-specific geologic conditions.

DOE assessed impacts to environmental resources based on the plume footprint at each site. Predicted plume radii for each site are provided as part of the site descriptions in Section 2.4. The plume radius is defined as the radius within which 95 percent of the gas-phase CO<sub>2</sub> mass occurs.

Computer simulations of plume behavior were based on the best available data, which would be supplemented with additional data collection at the chosen site, should the project proceed. For purposes of analysis in this EIS, plume radii were calculated by defining the radius as the radial distance from the injection well within which 95 percent of the CO<sub>2</sub> mass would be contained. The 95 percent cutoff was used to ensure that the reported plume radii represented the bulk of the injected CO<sub>2</sub>. The model results showed thin layers “stringer layers” of CO<sub>2</sub> that advanced ahead of the main plume due to high-permeability zones interpreted from well log data. These “stringers” account for a very small fraction of the injected CO<sub>2</sub>; neither the existence or extent of such high-permeability zones at each site is known. Hence, use of the 95 percent cutoff prevented these stringers from unrealistically inflating the plume radius calculations in a way that would not be justified by the available reservoir data. Because permeability values for different horizontal directions or at different locations in the area were available, the reservoir model resulted in a circular plume based on the assumption that permeability values were constant horizontally. However, under real-world conditions, there are various factors that would cause the injected plume of CO<sub>2</sub> to be non-circular in shape (plan view or footprint) or larger or smaller than has been predicted here. If the permeability of the rock differs as a function of direction (e.g., less in an east-west direction than in a north-south direction), the plume would have an elliptical (oval) shape instead of a circular shape. Variations in the permeability of the rock over short distances within the formation may also cause the plume to take an irregular shape. Similarly, if the formation has a network of moderately to poorly connected fractures, the plume could follow these fractures, resulting in irregular flow paths.

Although limited data on directional permeability can be obtained through a single well core, three or more nearby wells would be required to estimate directional permeability. Drilling and testing such deep wells would be exorbitantly expensive if done for all four sites and it is unlikely to be essential to site selection.

The size and shape of the plume would also be a function of pressure forces between the formation and injected CO<sub>2</sub>. While real-world injections require the regulation of fluid pressure buildup to prevent fracturing of the overlying caprock or seals, the computer simulations did not explicitly account for pressure-induced effects on the target formation or overlying caprock (i.e., geomechanical modeling was not included in the simulations). Most likely, failure to include geomechanical effects causes small errors in the simulation results that would not affect site selection.

While dissolution and buoyancy effects were considered in the plume model, natural flow of the native fluids in the reservoirs was not considered. Natural flow rates are usually extremely slow and in most situations would not be a concern. Dip (or inclination) of the strata is low (generally a few degrees) at each of the four sites and was not considered in the simulations as an influence on plume migration under buoyant forces. Furthermore, the size of the plume would be a function of various chemical reactions with the reservoir rock and native fluids, such as mineralization which occurs over hundreds of years. Geochemical effects, other than salt precipitation, were not considered in the calculations of the plume radii used in this EIS.

### 2.5.2.2 Monitoring, Mitigation, and Verification

The Alliance would rigorously monitor the sequestration efforts, including conditions in the proposed target formation as well as conditions in overlying strata, soil, groundwater supplies, and air. The comprehensive monitoring program would likely include installation of monitoring wells in strategic locations around the injection site in addition to atmospheric and shallow subsurface monitoring stations.

MM&V encompasses the process for ensuring the safe and permanent storage of sequestered gases. Injection of CO<sub>2</sub> into the subsurface would be regulated under EPA's UIC program. Monitoring would help to satisfy the protection requirements under the UIC program and would be used for a number of purposes, including but not limited to:

- Tracking the location of the plume of injected CO<sub>2</sub>;
- Ensuring that the injection well and any monitoring wells or abandoned wells in the area are not leaking; and
- Verifying the quantity of CO<sub>2</sub> that had been injected.

MM&V relevant to geologic sequestration can be divided into three broad categories of subsurface, soils, and the overlying air. Subsurface MM&V would involve tracking the fate of the injected CO<sub>2</sub> within the geologic formation and possible migration or leakage to the surface. Soil MM&V would involve detecting CO<sub>2</sub> in the first several feet of topsoil and tracking potential leakage pathways into the atmosphere. Methods to track CO<sub>2</sub> leaking to the atmosphere are challenging due to the difficulty in detecting small changes in CO<sub>2</sub> concentration above background concentrations that already exist in the atmosphere. However, tracers could be added to injected CO<sub>2</sub> to aid the monitoring process. These tracer chemicals can easily be measured at monitoring wells, are not commonly found in nature, do not rapidly degrade or interact with compounds in the formation, and exhibit low toxicity to biota.

The Alliance would monitor the injected CO<sub>2</sub> with methods that continuously measure or record data as well as methods that are conducted periodically. In general, the sampling and measurement frequency would be higher during the active injection period and would decrease afterwards. Baseline data would be collected during the year preceding injection. In terms of DOE's research program, the total monitoring timeline *includes* 1 year of baseline data collection, 4 years of active injection, and 2 years of post-injection monitoring. The monitoring scheme would be tailored to the characteristics of the site. If the CO<sub>2</sub> injection operation continues past the research phase, the Alliance or its successor would continue basic monitoring until sometime after the injection stops in accordance with UIC regulations and applicable permit conditions.

A preliminary schedule of monitoring during the first 6 years is provided in Table 2-6. Full descriptions of these techniques are found in the site Environmental Information Volumes (EIVs) (FG Alliance, 2006b, c, d, e). The Alliance may change the types and frequencies of monitoring activities after the initial research and testing phase of the project. As part of the Cooperative Agreement, at the end

**MM&V** is the capability to measure the amount of CO<sub>2</sub> stored at a specific sequestration site, to monitor the site and mitigate the potential for leaks or other deterioration of storage integrity over time, and to verify that the CO<sub>2</sub> is being stored and is not harmful to the host ecosystem.

of the 4-year operating period, the Alliance would be obligated to prepare a plan, which is mutually acceptable to DOE, to address the extent of continued monitoring of the sequestered CO<sub>2</sub>. On March 23, 2007, the Full Scope Cooperative Agreement was signed by both parties. Because the FutureGen Project is a research project, the Alliance may use some new and experimental monitoring methods, in addition to those listed in Table 2-6, to determine the fate and transport of the injected CO<sub>2</sub>.

**Table 2-6. Preliminary Schedule of Possible FutureGen Project CO<sub>2</sub> Plume Monitoring Activities**

Time (Years)	Baseline	Active Injection				Post Injection	
	-1	1	2	3	4	5	6
<b>Injection System Monitoring</b>							
Supervisory Control and Data Acquisition (SCADA) Monitoring of Injection Wells (Pressure, Temperature, Flow Rate)	n/a	<b>CONTINUOUS</b>					
<b>Remote Sensing</b>							
Light Detection and Ranging (LiDAR) Survey	X	X	X	X	X		X
<b>Atmospheric Monitoring</b>							
Eddy Covariance	<b>CONTINUOUS</b>						
<b>Near Surface Monitoring</b>							
Soil Gas Monitoring	XX	X	X	X	X		X
Surface Flux Emissions	XX	X	X	X	X		X
Vehicle Mounted CO <sub>2</sub> Leak Detection System	X	XXXX	XXXX	XXXX	XXXX	X	X
CO <sub>2</sub> Surface Well Monitoring	<b>CONTINUOUS</b>						
Borehole Tiltmeters	<b>CONTINUOUS</b>						
<b>Subsurface Monitoring</b>							
In-Situ Pressure/Temperature Monitoring (Injection Reservoir)	<b>CONTINUOUS</b>						
Fluid Sampling–Drinking Aquifer Monitoring Wells	X	XX	XX	XX	XX	X	X
Fluid Sampling–Primary Seal Monitoring Wells	X	XX	XX	XX	XX		X
Fluid Sampling–Injection Reservoir Monitoring Wells	X	XX	XX	XX	XX		X
Crosswell Seismic	X	X	X	X	X		X
Wireline Logging/Coring	X	X	X	X	X		X
Downhole Microseismic	<b>CONTINUOUS</b>						
Surface Seismic (2D,3D)	X	X	X		X		X

X = single monitoring event per year; XX = semi-annual monitoring; XXXX = quarterly monitoring; n/a = not applicable.  
Source: FG Alliance, 2007b.

Although the classification of UIC wells would be determined at the time of permitting, there is an overall standard of protection under the UIC Program that prohibits the movement of fluids into underground sources of drinking water. The citation below (from 40 CFR Part 144) provides the standard that all injection wells must be measured, including Class V (shallow and other) wells. This standard is currently in effect:

*§ 144.12 Prohibition of movement of fluid into underground sources of drinking water:*

*(a) No owner or operator shall construct, operate, maintain, convert, plug, abandon, or conduct any other injection activity in a manner that allows the movement of fluid containing any contaminant into underground sources of drinking water, if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 CFR Part 142 or may otherwise adversely affect the health of persons. The applicant for a permit shall have the burden of showing that the requirements of this paragraph are met.*

Furthermore, if any water quality monitoring of underground sources of drinking water indicates the movement of any contaminant into the water source, the state or EPA would require corrective action, operation, monitoring, or reporting as necessary to prevent such movement. The injection permit would be modified to reflect these additional requirements or the permit may be terminated. Appropriate enforcement action can be taken if a permit is violated.

### ***Continuous Monitoring Methods***

*A Supervisory Control and Data Acquisition (SCADA) system would continuously monitor and transmit flow rate, pressure, and temperature information from the injection wells to a central data collection point. An Eddy Covariance tower(s) would measure atmospheric CO<sub>2</sub> concentrations over a large area using an infrared gas analyzer and measure local meteorological variables such as wind velocity, relative humidity, and temperature. Using detectors installed at the wellheads, continuous CO<sub>2</sub> monitoring would also be conducted at existing wells that are within a predicted five-year plume footprint and that penetrate into the injection reservoir. An array of borehole micro-tiltmeters would be installed in shallow (25 foot [7.6 meter]) boreholes arranged in transects extending away from each injection well to the edge of the five-year plume footprint. The micro-tiltmeters would continuously record measurable changes in surface tilt from the CO<sub>2</sub> plume. Monitoring wells would be installed that contain instrumentation for continuously monitoring and recording fluid pressure and temperature in or above the injection reservoir. Additional monitoring wells would be drilled to the top of the primary seal and would house a permanent microseismic array for monitoring faint earth tremors (microseisms).*

### **Quarterly Monitoring Methods**

On a quarterly basis (see Table 2-6), the Alliance would use a vehicle-mounted CO<sub>2</sub> leak detection system equipped with a global positioning system. This system would monitor atmospheric concentrations overlying the area of the plume and allow real-time leak detection and mapping over broad areas.

### **Semi-Annual Monitoring Methods**

Fluid sampling from various monitoring wells would occur twice each year during the 4-year active injection period (research and development phase of the project). Fluid would be sampled from above the primary seal and in the reservoir. Fluid samples would be submitted to a laboratory for the following analyses: anions; carbonate and total alkalinity; metals; gases (methane, ethane, CO<sub>2</sub>, CO, nitrogen gas); salinity; and stable isotopes.

### **Annual Monitoring Methods**

A Light Detection and Ranging (LiDAR) survey would be conducted annually during the period that DOE would sponsor the FutureGen Project. LiDAR is an aerial technique that uses *laser* pulse travel times from an aircraft to the land surface to obtain high resolution topography data. The data would be

used to detect changes in surface elevation that could occur due to subsurface CO<sub>2</sub> injection and movement. Additionally, soil gas probes would be installed annually along transects extending away from the injection well(s) and would be analyzed for CO<sub>2</sub>, perfluorocarbon tracers, and stable carbon and O<sub>2</sub> isotopes. These soil gas probes help to detect leaks from the storage reservoir. Surface flux measurements would be conducted in a similar array as the soil gas probes and would aid in distinguishing a release of CO<sub>2</sub> from the injection reservoir from background CO<sub>2</sub>.

The Alliance would annually conduct crosswell seismic imaging, which is a geophysical technique that creates a two-dimensional (2D) image in a vertical plane through the CO<sub>2</sub> plume between pairs of wells. Sources and receivers are placed in wells completed in the injection reservoir to allow the best measurement of changes in rock properties (such as the velocity of seismic signals) that are affected by the presence of CO<sub>2</sub>. Similarly, wireline logging would be conducted whereby various sensors are lowered and raised inside a well to collect information about CO<sub>2</sub> saturation in rock surrounding the well. Other devices can be lowered into a well to collect rock-core samples for geochemical and geomechanical analyses. This technique can yield information about the mechanical integrity of the well bores and can verify the interpretation of data from wireline logging.

The Alliance would also conduct seismic imaging to create 2D or three-dimensional (3D) images of the CO<sub>2</sub> plume by measuring changes in rock properties such as seismic velocity that are affected by the presence of CO<sub>2</sub>. Seismic imaging uses either large vibroseis trucks weighing up to 56,000 pounds (25,401 kilograms), with heavy steel vibrators on them, or small explosives (often detonated in shallow boreholes) to produce seismic signals. This is done along potentially hundreds of “shot” points along lines that are surveyed across the study area. The vibrations caused at the surface travel downward and reflect from geologic layers and features, which cause echoes or reflections that travel back up to the land surface. Electromagnetic transducers, or geophones, detect the echoes and convert them into electrical signals. These signals are then processed into images of the subsurface.

Although leakage would not be expected, operators of the injection site(s) would need to be prepared to address a leak if one occurs. Active or abandoned wells (including the injection wells themselves) are potential pathways, and identifying options for remediating leakage of CO<sub>2</sub> from these pathways is especially important.

Similar to occurrences in oil and gas extraction wells, a blow-out could occur at the injection wellhead. Stopping blow-outs or leaks from injection wells or abandoned wells could be accomplished using standard oil field techniques (one such method is to inject a heavy mud into the well casing). If access to the well head is not safe or possible, heavy mud could still be introduced into the well by drilling a new well that would intercept the casing below the ground surface, and then mud would be pumped through this interception well and into the injection well. After control of the well is re-established, the well could either be repaired or abandoned.

Leaking injection wells could be repaired by replacing the injection tubing and packers. If the annular space behind the casing was leaking, the casing could be perforated to allow injection of cement behind the casing until the leak was stopped. If the well could not be repaired, it would be sealed and abandoned using established methods. Table 2-7 provides an overview of remediation options for typical leakage scenarios.

**Table 2-7. Remediation Options for Geological CO<sub>2</sub> Storage Projects**

Scenario	Remediation Options
Leakage up faults, fractures, and spill points	<ul style="list-style-type: none"> <li>• Lower injection pressure by injecting at a lower rate or through a larger number of wells.</li> <li>• Lower reservoir pressure by removing water or other fluids from the storage structure.</li> <li>• Intersect the leakage with extraction wells in the vicinity of the leak.</li> <li>• Create a hydraulic barrier by increasing the reservoir pressure upstream of the leak.</li> <li>• Lower the reservoir pressure by creating a pathway to access new compartments in the storage reservoir.</li> <li>• Stop injection to stabilize the project.</li> <li>• Stop injection, produce the CO<sub>2</sub> from the storage reservoir, and reinject it back into a more suitable storage structure.</li> </ul>
Leakage through active or abandoned wells	<ul style="list-style-type: none"> <li>• Repair leaking injection wells with standard well re-completion techniques such as replacing the injection tubing and packers.</li> <li>• Repair leaking injection wells by squeezing cement behind the well casing to plug leaks behind the casing.</li> <li>• Plug and abandon injection wells that cannot be repaired by the methods listed above.</li> <li>• Stop blow-outs from injection or abandoned wells with standard techniques to 'kill' a well such as injecting a heavy mud into the well casing. After control of the well is re-established, the recompletion or abandonment practices described above can be used. If the wellhead is not accessible, a nearby well can be drilled to intercept the casing below the ground surface and 'kill' the well by pumping mud down the interception well.</li> </ul>
Accumulation of CO <sub>2</sub> in the vadose zone and soil gas	<ul style="list-style-type: none"> <li>• Accumulations of gaseous CO<sub>2</sub> in groundwater can be removed or at least made immobile, by drilling wells that intersect the accumulations and extracting the CO<sub>2</sub>. The extracted CO<sub>2</sub> could be vented to the atmosphere or reinjected back into a suitable storage site.</li> <li>• Residual CO<sub>2</sub> that is trapped as an immobile gas phase can be removed by dissolving it in water and extracting it as a dissolved phase through a groundwater extraction well.</li> <li>• CO<sub>2</sub> that has dissolved in the shallow groundwater could be removed, if needed, by pumping to the surface and aerating it to remove the CO<sub>2</sub>. The groundwater could then either be used directly or reinjected back into the groundwater.</li> <li>• If metals or other trace contaminants have been mobilized by acidification of the groundwater, 'pump-and-treat' methods can be used to remove them. Alternatively, hydraulic barriers can be created to immobilize and contain the contaminants by appropriately placed injection and extraction wells. In addition to these active methods of remediation, passive methods that rely on natural biogeochemical processes may also be used.</li> </ul>
Leakage into the vadose zone and accumulation in soil gas	<ul style="list-style-type: none"> <li>• CO<sub>2</sub> can be extracted from the vadose zone and soil gas by standard vapor extraction techniques from horizontal or vertical wells.</li> <li>• Fluxes from the vadose zone to the ground surface could be decreased or stopped by caps or gas vapor barriers. Pumping below the cap or vapor barrier could be used to deplete the accumulation of CO<sub>2</sub> in the vadose zone.</li> <li>• Because CO<sub>2</sub> is a dense gas, it could be collected in subsurface trenches. Accumulated gas could be pumped from the trenches and released to the atmosphere or reinjected back underground.</li> <li>• Passive remediation techniques that rely only on diffusion and 'barometric pumping' could be used to slowly deplete one-time releases of CO<sub>2</sub> into the vadose zone. This method would not be effective for managing ongoing releases because it is relatively slow.</li> <li>• Acidification of the soils from contact with CO<sub>2</sub> could be remediated by irrigation and drainage. Alternatively, agricultural supplements such as lime could be used to neutralize the soil.</li> </ul>

**Table 2-7. Remediation Options for Geological CO<sub>2</sub> Storage Projects**

Scenario	Remediation Options
Large releases of CO <sub>2</sub> to the atmosphere	<ul style="list-style-type: none"> <li>• For releases inside a building or confined space, large fans could be used to rapidly dilute CO<sub>2</sub> to safe levels.</li> <li>• For large releases spread out over a large area, dilution from natural atmospheric mixing (wind) would be the only practical method for diluting the CO<sub>2</sub>.</li> <li>• For ongoing leakage in established areas, risks of exposure to high concentrations of CO<sub>2</sub> in confined spaces (e.g., cellar around a wellhead) or during periods of very low wind, fans could be used to keep the rate of air circulation high enough to ensure adequate dilution.</li> </ul>
Accumulation of CO <sub>2</sub> in indoor environments with chronic low-level leakage	<ul style="list-style-type: none"> <li>• Slow releases into structures can be eliminated by using techniques that have been developed for controlling release of radon and volatile organic compounds (VOCs) into buildings. The two primary methods for managing indoor releases are basement/substructure venting or pressurization. Both would have the effect of moving soil gases away from the indoor environment.</li> </ul>
Accumulation in surface water	<ul style="list-style-type: none"> <li>• Shallow surface water bodies that have significant turnover (shallow lakes) or turbulence (streams) will quickly release dissolved CO<sub>2</sub> back into the atmosphere.</li> <li>• For deep, stably stratified lakes, active systems for venting gas accumulations have been developed and applied at Lake Nyos and Monoun in Cameroon.</li> </ul>

Source: IPCC, 2005.

### 2.5.3 RISK ASSESSMENT OF LEAKAGE OF CAPTURED GASES BEFORE GEOLOGIC SEQUESTRATION

One of the distinguishing aspects of the FutureGen Project is the capture of CO<sub>2</sub> (and other gases) from the gasification process. While there are existing power plants that capture CO<sub>2</sub>, a FutureGen Project goal is to demonstrate the integration of CO<sub>2</sub> capture with a state-of-the-art IGCC power plant. The FutureGen Project would also provide a test bed for newer capture technologies, such as membranes that can separate H<sub>2</sub> from other gases, including CO<sub>2</sub>. Because CO<sub>2</sub> capture technologies do pose some risks not commonly found in power plants, DOE assessed the risks and hazards of alternative capture technologies and pipeline transmission of captured gases. DOE worked with nationally recognized experts in relevant fields (e.g., natural gas transmission engineering, pipeline design, and EOR) to develop and apply its risk assessment methodology (see Appendix D). The results of this risk assessment are incorporated in this EIS.

### 2.5.4 RISK ASSESSMENT OF LEAKAGE OF SEQUESTERED GASES FROM GEOLOGIC RESERVOIRS

A key objective of the FutureGen Project is to verify the effectiveness, safety, and permanence of CO<sub>2</sub> stored in geologic formations. Because geologic sequestration of CO<sub>2</sub> in deep saline formations is a relatively new endeavor in the U.S. and abroad, it is important to advance the understanding of the pathways and associated risks of potential leaks of CO<sub>2</sub> from geologic formations.

In general, standardized, well-accepted methods of assessing risks and impacts of the sequestered gases (CO<sub>2</sub> and any other captured gases) do not exist. To assess the potential environmental impacts of CO<sub>2</sub> sequestration, DOE developed a protocol and methods to assess the risks of both slow leaks (including contamination of groundwater supplies and surface water supplies by sequestered gases and by displaced native fluids) and catastrophic rapid releases of sequestered gases (e.g., a well blow out). Subsequently, DOE asked nationally recognized experts in relevant fields (e.g., reservoir simulation, EOR, natural gas storage field management, geochemistry, geophysics, and reservoir engineering) to review and provide input on the risk assessment methodology (see Appendix D). While the risk assessment has been performed as part of this EIS, it should be noted that after selection of the host site, the Alliance would undertake a more comprehensive evaluation of the sequestration site and target reservoirs. At that point, the Alliance would drill one or more exploratory wells and conduct more characterization of the risks and potential impacts. DOE then would evaluate the resulting information as part of its preparation of a Supplement Analysis to determine whether a Supplemental EIS would be required. The Risk Assessment Report is posted on the NETL website (<http://www.netl.doe.gov/technologies/EIS>) and is available on the *Final* EIS distribution CD.

### 2.5.5 RESOURCE REQUIREMENTS

#### 2.5.5.1 Coal Requirements

The Alliance plans to test a variety of coal types during the DOE-sponsored 4-year operating period. While specific coal types and properties have yet to be selected, the conceptual design was developed based on representative properties for three common coal types: Northern Appalachia Pittsburgh coal, Illinois Basin coal, and PRB coal. These three coal types are broadly representative of eastern bituminous, mid-western bituminous, and western low-rank *sub-bituminous* coals, *respectively*. Because the FutureGen Project is a research and development effort of nation-wide (and world-wide) significance, it is desirable for the facility to incorporate a degree of fuel flexibility that would not necessarily be included in the design of a conventional power plant. After the 4-year operating period, the Alliance or its

successor may choose a different type of coal or fuel type based on economic factors or continuing research needs.

The power plant would require up to 1.89 million tons (1.7 MMT) of coal per year. DOE assumed that coal would be delivered by rail to all the candidate sites because it is the most economically feasible option. For the purposes of analysis within this EIS, this assumption was used. Based on the type of coal, rail shipments would average five trains per week, with each train consisting of approximately 100 railcars.

### **2.5.5.2 Infrastructure Requirements**

Alternative sites were selected based on a number of factors, including proximity to utilities such as electricity transmission, natural gas, water, and sewer lines. The FutureGen Project requires the ability to connect to the local electric grid, a potable water source (unless an on-site potable water treatment plant is constructed), a process water source, a natural gas supply, and a sanitary sewer (or construction of a packaged system on site). The Alliance may construct a holding pond or reservoir on site to store process water to meet water requirements. Connection to the electric grid may require the construction of additional transmission lines, installation of new electrical substations, or upgrades to existing substations. Furthermore, electricity would be needed at the CO<sub>2</sub> injection sites to power pumps, compressors, and monitoring equipment. New utility lines may require new easements and ROWs or the expansion of existing ROWs. The utilities available and method of interconnection would be dependent on the characteristics of the site location.

The FutureGen Project would include the construction and operation of a research and development facility to be co-located on the power plant site. The scope of activities that would occur at this facility has not yet been determined. The plant may also include an on-site Visitor Center, where the public and invited guests could learn about the plant and its technologies through displays and possibly interactive exhibits.

### **2.5.5.3 Natural Gas Requirements**

During gasifier unplanned restart, natural gas-fired burners would heat the gasifier to a temperature sufficiently high to initiate coal feed and gasification. Exhaust gas from the natural gas-fired burners would be vented to the flare stack. The frequency of restarts would depend upon the research and development needs, the rate of plant upsets, and how often coal types are changed. During a restart event, natural gas would be used at a rate of up to 1.8 million cubic feet per hour (50,970 cubic meters per hour). During restarts, natural gas would primarily be required for warming up the gasifier (up to 4 hours) and the combustion turbine (up to 2 hours).

### **2.5.5.4 Process Water Requirements**

The plant would consume up to 3,000 gallons (11,356 liters) per minute of water. The cooling tower system would account for most of this water requirement. Other uses of water at the power plant would include coal handling (slurry preparation and dust suppression) and replacement of HRSG blowdown water.

Water would be required at the sequestration sites during construction to support the drilling of injection and monitoring wells. As this is a short-duration activity, DOE assumes that water would be trucked to the site for this purpose. Water would also be required for integrity testing of the new CO<sub>2</sub> pipelines before the start of sequestration activities. This testing would occur before the operational

phase. The water could be supplied from the power plant site's proposed process water source or it could be supplied by tanker truck.

### 2.5.5.5 Transportation Requirements

All the sites are bordered by existing freight railroad lines. Rail transportation would be used for coal and other shipments to the site. A rail loop and siding on the property would be constructed to allow trains with approximately 100 railcars to exit the mainline and load and unload shipments within the plant boundary (see Figure 2-18). In addition, all of the candidate sites would be accessible by roads and highways to allow for other deliveries of products and materials to and from the plant site, as well as to facilitate commuting for workers.

### 2.5.5.6 Land Area Requirements

To allow adequate land area for the FutureGen Power Plant, coal storage, potential rail loop and siding, employee parking, potential research and development activity, possible on-site storage of slag, and other supporting structures, the Alliance estimates up to 200 acres (81 hectares) of land would be required. Easements and ROWs would also be required for new or expansions of existing utility, road, and rail corridors.

Land or easements would also be needed for injection wells, monitoring wells, and other supporting infrastructure at the sequestration site. The amount needed would depend on the geologic attributes of the sequestration reservoir, and for MM&V purposes, the projected size of the plume. However, it is expected that the disturbance footprint for these corridors would be up to than 10 acres (4 hectares) (either contiguous or noncontiguous).

## 2.5.6 DISCHARGES, WASTE, AND PRODUCTS

### 2.5.6.1 Air Emissions

IGCC power plants that are currently in operation have achieved the lowest levels of criteria air pollutant, Hg and other hazardous air pollutants (HAPs) emissions of any coal-fueled power plant technologies (DOE, 2002). The six criteria air pollutants are sulfur dioxide (SO<sub>2</sub>), CO, ozone, nitrogen dioxide (NO<sub>2</sub>), lead (Pb), and inhalable particulates, which are also known as respirable particulate matter (PM). The PM<sub>10</sub> standard covers particles with diameters of 10 micrometers or less and the PM<sub>2.5</sub> standard covers particulates with diameters of 2.5 micrometers or less. Ozone is not emitted directly from a combustion source. It is formed from photochemical reactions involving emitted VOCs and NO<sub>x</sub>. Table 2-8 provides FutureGen Project performance targets for air emissions compared with DOE's Fossil Energy Clean Coal Power Initiative (CCPI) targets.

**Table 2-8. FutureGen Project Performance Targets**

Pollutant	FutureGen Performance Targets (by 2016) <sup>1</sup>	DOE's Fossil Energy CCPI Targets (by 2020)
SO	>99 percent sulfur removal <sup>2</sup> (0.032 lb [0.015 kg]/10 <sup>6</sup> Btu) <sup>3,4</sup>	>99 percent sulfur removal
NO <sub>x</sub>	<0.05 lb [0.02 kg]/10 <sup>6</sup> Btu	<0.01 lb (0.005 kg)/10 <sup>6</sup> Btu
PM <sub>10</sub>	<0.005 lb [0.002 kg]/10 <sup>6</sup> Btu	<0.002 lb (0.001 kg)/10 <sup>6</sup> Btu
Hg	> 90 percent Hg removal (≤0.611 lb [0.277 kg]/10 <sup>12</sup> Btu) <sup>4</sup>	95 percent Hg removal
CO	n/a <sup>5,6</sup>	n/a <sup>6</sup>

**Table 2-8. FutureGen Project Performance Targets**

<b>Pollutant</b>	<b>FutureGen Performance Targets (by 2016)<sup>1</sup></b>	<b>DOE's Fossil Energy CCPI Targets (by 2020)</b>
VOC	n/a <sup>6</sup>	n/a <sup>6</sup>
Pb	n/a <sup>5,6</sup>	n/a <sup>6</sup>
CO <sub>2</sub>	>90 percent capture and sequestration	n/a <sup>6</sup>

<sup>1</sup> FutureGen facility operating at full load under steady-state conditions. **Performance targets based on project goals identified in 2004 report to Congress (DOE, 2004).**

<sup>2</sup> Sulfur removal from feed coal.

<sup>3</sup> Based on the FutureGen Project performance target and calculated with AP-42 (Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources) emissions factors.

<sup>4</sup> Mass emission rates are based on conceptual design coal properties and performance estimates. See Table 2-9 for tons per year estimates.

<sup>5</sup> No FutureGen Project Performance Target for Pb and CO; however, existing IGCC power plants have demonstrated CO emission levels of <0.033 lb (0.015 kg)/10<sup>6</sup> Btu and Pb emissions ranging from trace amounts to 2.9 lb (1.3 kg)/10<sup>12</sup> Btu. Trace amounts means the pollutant is present in levels no greater than 1,000 ppm or <0.1 percent by weight.

<sup>6</sup> n/a = No performance target or no CCPI target.

Btu = British thermal unit; kg = kilogram.

Sources: DOE, 2002; DOE, 2006a; DOE, 2006b.

Geologic CO<sub>2</sub> sequestration would be a unique component of the FutureGen Project that would help significantly lower air emissions of CO<sub>2</sub>. However, this project's feature adds to the capital cost of the plant and consumes some of the power plant's energy output, resulting in an overall decrease in the net efficiency of the power plant. Although the FutureGen Project is being developed to be the first near-zero-emissions coal power plant, low levels of air emissions would be generated by process units such as the gasifier, combustion turbines, and the cooling towers.

When switching between coals, performing certain tests, or experiencing a malfunction, the facility would need to be brought down to a reduced state of operations or perhaps be shut down completely. Upon restart, facility emissions would be higher than steady-state operations as process units are brought online and ramped up to optimum performance. In addition, due to the complexity of integrating advanced technologies, unexpected shutdowns are likely to occur. Associated with such unplanned restarts are short-term increases to facility emissions due to the need to flare process gases for a short period, as well as to restart the facility (i.e., unplanned restarts). The types of unplanned restarts and the frequencies of their occurrence are uncertain. Therefore, estimates for unplanned restarts over the life of the project were developed based on experience at existing IGCC facilities. DOE expects that, over time, learning and experience would reduce the frequency and types of unplanned restarts reflected in estimates shown in Table 2-9. DOE and the Alliance estimate that the first year of the research and development period would have the greatest number of unplanned restarts with 29 occurrences. Years 2, 3, and 4 are estimated to have 18, 14, and 13 unplanned occurrences, respectively.

The Alliance provided the FutureGen Project's estimate of maximum air emissions that would be expected from the facility. DOE has reviewed and verified that this estimate of maximum air emissions provides a reasonable upper bound for air emissions considered in the EIS. However, given the early stages of plant design, there is some uncertainty with these data. Table 2-9 compares the FutureGen Project's estimate of maximum air emissions (based on the predicted number of startups during the first year) with the performance target emission rates for the FutureGen Project. Because emissions of criteria pollutants are projected to exceed 100 tons per year, the FutureGen Project would be classified as a major source under Clean Air Act regulations.

**Table 2-9. FutureGen Project Potential Air Emissions:  
FutureGen Project Estimated Maximum Air Emissions vs. Performance Target**

Air Emissions	Initial Startup Emissions(2012) <sup>1</sup> (tpy [mtpy])	Planned Performance Target Emissions (2016 and beyond) <sup>2</sup> (tpy [mtpy])
SO <sub>2</sub>	543 (493)	<b>100 (90.7)</b>
NO <sub>2</sub> <sup>3</sup>	758 (688)	326 (296)
PM <sub>10</sub>	111 (101)	33 (30)
Hg	1.1x10 <sup>-2</sup> (1.0x10 <sup>-2</sup> )	0.4x10 <sup>-2</sup> (0.36x10 <sup>-2</sup> )
CO	611 (554)	n/a <sup>4</sup>
VOC	30 (27)	n/a <sup>4</sup>
CO <sub>2</sub> <sup>5</sup>	0.18 x 10 <sup>6</sup> (0.17 x 10 <sup>6</sup> ) up to 0.45 x 10 <sup>6</sup> (0.41 x 10 <sup>6</sup> )	0.12 x 10 <sup>6</sup> (0.11 x 10 <sup>6</sup> ) up to 0.28 x 10 <sup>6</sup> (0.25 x 10 <sup>6</sup> )

<sup>1</sup> Maximum emissions for the first year of operations and includes steady-state at 85 percent availability of facility plus unplanned restart emissions. First year of operations is estimated to have 29 unplanned outage events, the most of the 4-year research and development period. Year 2 would have 18; Year 3 would have 14; Year 4 would have 13.

<sup>2</sup> NO<sub>2</sub>, PM<sub>10</sub>, and Hg were calculated based upon **FutureGen Project Performance Targets** (see Table 2-8). **Final technology configuration and design will dictate actual emissions. SO<sub>2</sub> was based on reduced unplanned outage events at the end of the 4-year research and development period (see Appendix E).** Calculated at 85 percent availability of facility. Parameters are for "average" coal and average annual heat input rate of 1,754 million Btu/hour obtained from similar plants. Heat input at 70°F. "Average coal" estimates are based on the parameters averaged out for the three proposed coal types: PRB, Illinois Basin, and the Northern Appalachia Pittsburgh.

<sup>3</sup> **NO<sub>x</sub> emissions from coal combustions are primarily nitric oxide (NO); however, for the purpose of the air dispersion modeling it was assumed that all NO<sub>x</sub> emissions are NO<sub>2</sub>. One of the technologies being considered for the FutureGen Project is post-combustion selective catalytic reduction (SCR), which would reduce the annual NO<sub>2</sub> emissions in this base case to 252 tons per year (228.6 metric tpy).**

<sup>4</sup> n/a indicates that emission targets for these pollutants have not been established.

<sup>5</sup> Calculated based on maximum emissions of up to 2.5 MMT/year for 100 percent availability of facility and 1.0 MMT/year for less than 100 percent availability. The FutureGen Project's initial startup emissions assumes 85 percent capture and 15 percent release to the atmosphere. The FutureGen Project performance target emissions assumes 90 percent capture and 10 percent release to the air. **Based on the worst case scenarios for coals, at startup in 2012, this equals between 114 lbs/MW hr to 243 lbs/MW hr of CO<sub>2</sub> emitted, and 647.20 lbs/MW hr to 1,377.77 lbs/MW hr of CO<sub>2</sub> captured, depending on plant availability and less than 90 percent CO<sub>2</sub> capture. For 2016, when the R&D of the projects ends, it is assumed 90 percent capture and 10 percent emitted into the atmosphere; therefore from 76.14 lbs/MW hr to 162.09 lbs/MW hr of CO<sub>2</sub> emitted depending on plant availability. Conversely, at 90 percent capture, this results in 685.3 lbs/MW hr to 1,458.9 lb/MW hr CO<sub>2</sub> captured.**

tpy = tons per year; mtpy = metric tons per year.

Source: FG Alliance, 2006g.

A key goal of the FutureGen Project is to improve power plant technology and reduce emission levels. Table 2-10 provides baseline emissions to show the differences in air emissions between the FutureGen Project performance targets for air emissions and existing IGCC power plants and non-IGCC state-of-the-art (SOTA) conventional pulverized coal-fueled power plants. Figure 2-21 illustrates how advancements in technology have reduced major criteria pollutants from power plants over time.

**Table 2-10. Comparison of FutureGen Project Performance Target to Other IGCC and SOTA Power Plant Technologies (tpy [mtpy])**

<b>Air Emissions</b>	<b>2016 FutureGen Project<sup>1</sup> (275 MW)</b>	<b>2007 Orlando<sup>2,3</sup> (275 MW)</b>	<b>1996 Polk<sup>2,4</sup> (275 MW)</b>	<b>2000 SOTA<sup>2,5</sup> (275 MW)</b>	<b>1990 SOTA<sup>2,6</sup> (275 MW)</b>
SO <sub>2</sub>	<b>100 (90.7)</b>	155 (140)	821 (744)	2,891 (2,622)	18,013 (16,341)
NO <sub>2</sub>	326 (296)	611 (554)	620 (562)	6,537 (5,930)	7,747 (7,028)
PM	33 (30)	159 (144)	75 (68.0)	653 (592.4)	758 (687.7)
Hg	0.004 (0.0036)	0.015 (0.0136)	0.017 (0.0154)	0.112 (0.1016)	0.103 (0.0934)
CO <sub>2</sub> (MMT/yr)	0.11 (0.10) to 0.28 (0.25)	1.80 (1.6)	1.37 (1.243)	4.47 (4.055)	6.22 (5.643)

<sup>1</sup> SO<sub>2</sub> emissions are calculated based on the reduced unplanned outage events after year 4. Unplanned outage events would result in higher SO<sub>2</sub> emissions at restart. NO<sub>2</sub>, PM<sub>10</sub>, and Hg emissions calculated from FutureGen Project Performance Target as presented in the Report to Congress using "average" coal with a heat input rate of 1,754 MMBtu/hr at 70°F (DOE, 2004). CO<sub>2</sub> calculated based on 90 percent capture and sequestration goal (FG Alliance, 2006g).

<sup>2</sup> Orlando Gasification Project (Orlando) and Tampa Electric Company Polk Power Station (Polk) planned and operating IGCC power plants, respectively, and the SOTA are conventional coal-fueled power plants.

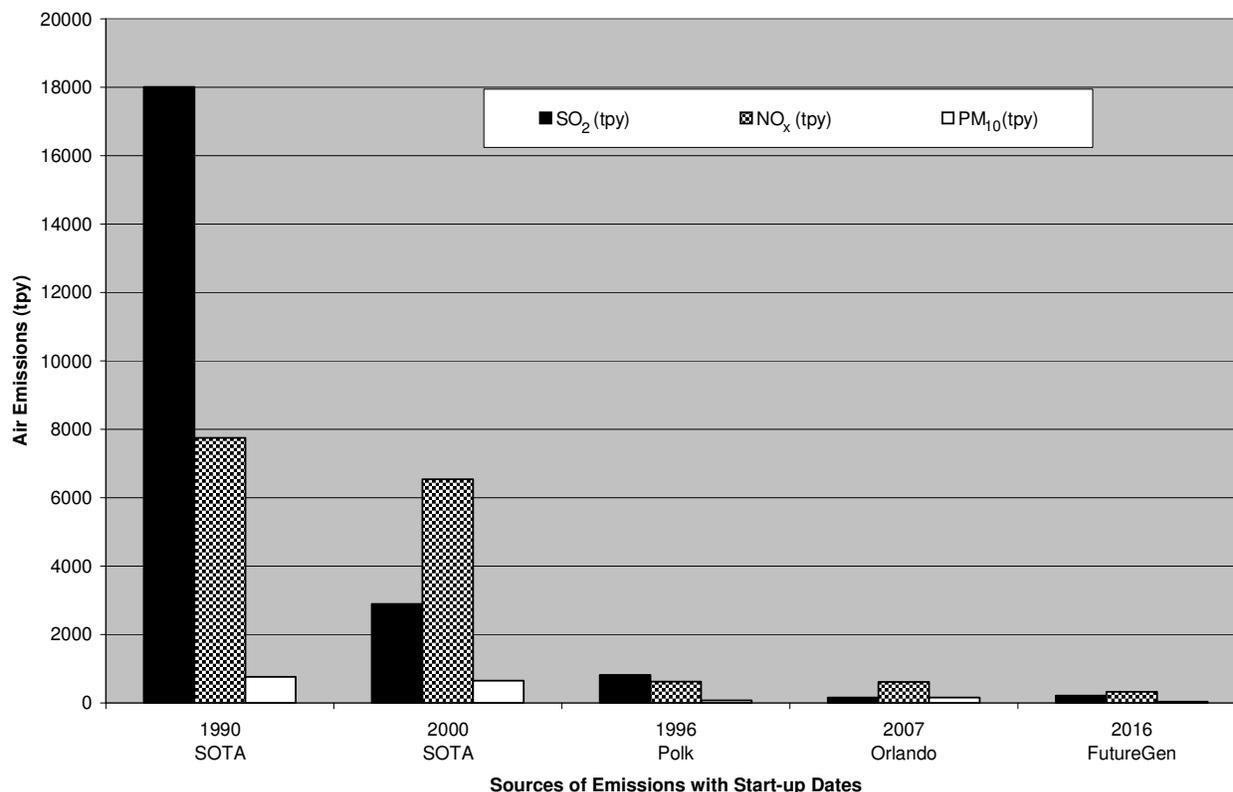
<sup>3</sup> SO<sub>2</sub>, NO<sub>2</sub>, and Hg are based on emission limiting conditions in the Final PSD Permit (FLDEP, 2007a). PM<sub>10</sub> emissions based on potential emissions from the combustion turbine/HRSG as reported in PSD Permit Application (FLDEP, 2007b). CO<sub>2</sub> emissions are projected based on estimates reported in Orlando Gasification Project Final EIS (DOE, 2007).

<sup>4</sup> SO<sub>2</sub> and CO<sub>2</sub> emissions are actuals reported for Acid Rain Program (EPA, 2007a). Hg emissions from limiting conditions in Title V permit (FLDEP, 2007c). NO<sub>2</sub> and PM emissions from limiting conditions in Title V permit modification (FLDEP, 2007d).

<sup>5</sup> SO<sub>2</sub> and CO<sub>2</sub> emissions are actuals reported for Acid Rain Program from Hayden, Routt, CO facility. NO<sub>x</sub> are actuals reported for Acid Rain Program from E.D. Edwards, Peoria, IL facility. PM emissions calculated from rates obtained from DOE database for Hayden, Routt, CO facility. Hg emission factors and heat value as reported in EPA's *Locating and Estimating Air Emissions from Sources of Mercury and Mercury Compounds* (EPA, 1997).

<sup>6</sup> SO<sub>2</sub> and NO<sub>2</sub> emissions are actuals reported for Acid Rain Program from Meramac, St. Louis, MO facility. CO<sub>2</sub> emissions are actuals reported for Acid Rain Program from C G Allen, Gaston, NC facility. Hg emissions for 2005 as reported in EPA Envirofacts website from Cholla, Navajo, AZ facility. PM emissions calculated from rates obtained from DOE database for C G Allen, Gaston, NC facility (275 MW) that made modification in 1996.

MMT/yr = million metric tons per year; MW = megawatt.



tpy = tons per year.

**Figure 2-21. Comparison of FutureGen Project Performance Target to Other IGCC and SOTA Power Plant Technologies**

Emissions from the FutureGen Project would be lower than emissions from other IGCC power plants and SOTA coal plants. SO<sub>2</sub> emissions rates from the Orlando Gasification Project (Orlando) *are comparable to FutureGen Project because* this facility uses low sulfur PRB sub-bituminous coal. As a research platform, the FutureGen Project would use various types of coal with varying sulfur content.

*The conceptual design of FutureGen, as presented in the Initial Conceptual Design Report (ICDR), does consider the application of SCR to achieve NO<sub>x</sub> emission levels of approximately 0.02 lb/MMBtu. Other techniques for NO<sub>x</sub> reductions are also under consideration, such as using nitrogen gas as a diluent in the combustion gas turbine to adjust the firing temperature and thereby minimize the thermal formation of NO<sub>x</sub>.*

*At the present time, the conceptual design includes the use of one carbon bed filter to capture Hg from cooled syngas in or near the acid gas removal unit (see Section 2.5.1, the subsection for “Syngas Conditioning”). A single filter is expected to achieve 90 to 95 percent capture efficiency. FutureGen is expected to serve as a test bed for future Hg removal technologies.*

*Because FutureGen would be designed to gasify a variety of coal types (including some high sulfur coals), the plant may not be optimized to a single fuel type for either efficiency in energy conversion or pollutant minimization, so the optimal minimization of NO<sub>x</sub> and other pollutant emissions may not be achieved. Furthermore, because the plant would be designed to accommodate a variety of R&D applications that may be proposed in the future, plant components would be integrated loosely such that the power plant as a whole may not perform optimally from an energy conversion perspective.*

### **2.5.6.2 Solid Waste**

The primary solid waste stream produced by the power plant would be slag and ash. It is estimated that 96,865 tons (87,874 metric tons) and 47,565 tons (43,150 metric tons) of slag and ash would be generated each year, respectfully. If technology Case 3B is not implemented, only slag would be generated (96,865 tons [87,874 metric tons]). If a beneficial reuse could not be found for the slag or ash, it could be disposed of on the power plant site in accordance with state regulations. The ZLD would also generate solids on the order of 5,558 tons (5,042 metric tons) per year and sludge at a rate of up to 1,545 tons (1,402 metric tons) of solid waste per year. The sludge and ZLD solids could be disposed of at a sanitary landfill if they do not exhibit hazardous waste characteristics. Elemental sulfur would be disposed of as a waste if there were no market. Carbon filters for Hg removal would probably be returned to the vendor for reactivation or recycling. The power plant would also generate regular trash (non-hazardous solid waste) that would be sent to a sanitary (municipal) landfill. As a BMP, the Alliance would institute a comprehensive pollution prevention and recycling program to minimize waste.

### **2.5.6.3 Marketable Products**

As previously stated, the FutureGen Project would produce salable quantities of elemental sulfur or sulfuric acid. Most of the sulfur or sulfuric acid sold in the U.S. is used in the manufacture of fertilizer. Sulfuric acid is also used in oil refining, wastewater processing, and chemical synthesis. The Alliance would attempt to negotiate a contract to sell its sulfur, most likely to a fertilizer manufacturer.

The FutureGen Project would also generate 96,865 tons (87,874 metric tons) of slag and 47,565 tons (43,150 metric tons) of ash per year. If economical, the slag or ash would be transported off site to a recycling facility or manufacturer that could recycle it into a beneficial product. Slag is often recycled into blasting grit or roofing material, or it can be incorporated into hot-mix asphalt (Kalyoncu, 2002). It can also be used in railroad track ballast, fertilizer, and seawalls. Ash is often included in concrete products to enhance strength and durability. It is also used in structural fills, as feed material for cement clinker, and for road base construction. The method of slag or ash disposal would depend on the site selected to host the FutureGen Project and its local or regional markets for these products. Off-site transportation of the slag or ash could be achieved by rail or truck, which would be determined after site selection based on the location of delivery points and economic factors.

Potential markets for products and likely purchasers may be identified during the best and final offers by Site Proponents or as part of the ultimate selection of the host site. Potential environmental impacts from the use or fate of these products and impacts from the transport of products away from the power plant site would be addressed by a Supplement Analysis that would be conducted after further site characterization and site-specific design work at the host site.

### **2.5.6.4 Toxic and Hazardous Materials**

The FutureGen Project would use a variety of process chemicals, primarily used in the treatment of process water and maintenance of the cooling towers. The selective catalytic reduction process would use approximately 1,333 tons (1,209 metric tons) per year of aqueous ammonia. If the plant generates sulfur waste in the form of sulfuric acid instead of elemental sulfur, it is possible that some sulfuric acid could be recycled for use in water processing at the plant, although some pre-treatment may be required. Table 2-11 lists the estimated quantities and uses of chemicals required to operate the FutureGen Power Plant.

**Table 2-11. Estimated Quantities and Uses of Chemicals for FutureGen Plant Operation**

Process	Chemical Type	Estimated Annual Quantity <sup>1</sup> (tpy [mtpy])	Estimated Storage On Site (gallons [liters])
H <sub>2</sub> S and CO <sub>2</sub> Separation (1 <sup>st</sup> and 2 <sup>nd</sup> Stage)	Physical Solvent	11,300 gallons (42,775 liters)	940 (3,558)
SCR for NO <sub>x</sub> removal	Aqueous Ammonia	1,333 (1,209)	28,700 (108,641)
Cooling Tower Operation and Maintenance	Sulfuric Acid	8,685 (7,879)	94,200 (356,585)
	Antiscalant	0.47 (0.43)	8 (30.3)
	Sodium Hypochlorite	1,684 (1,527)	32,900 (124,540)
Water Make-Up Demineralizer	Sodium Bisulfite	7 (6.4)	88 (333)
	Sulfuric Acid	21 (19.1)	225 (851)
	Liquid Antiscalant and Stabilizer	17 (15.4)	281 (1,064)
Wastewater Treatment Demineralization	Sodium Bisulfite	5.0 (4.5)	67 (253.6)
	Sulfuric Acid	85 (77.1)	921 (3,486)
	Liquid Antiscalant and Stabilizer	10 (8.7)	163 (617.0)
Clarifier Water Treatment Chemicals	Lime	1,237 (1,122)	7,380 (27,936)
	Polymer	295 (268)	5,020 (19,002)

<sup>1</sup> Expressed in tpy (mtpy) unless otherwise indicated.  
tpy = tons per year; mtpy = metric tons per year.

### 2.5.6.5 Pollution Prevention, Recycling, and Reuse

The FutureGen Project would be designed to minimize process-related discharges to the environment. A plan for pollution prevention and recycling would be developed during the site-specific design and permitting steps and would be put into practice after the power plant becomes operational. Table 2-12 lists some measures that may be employed as part of that plan.

**Table 2-12. Possible Pollution Prevention, Recycling, and Reuse Features**

Spill Control Plan	The Spill Control Plan would specify measures to take in the event of a spill, thereby protecting environmental media from the effect of accidental releases. All aboveground chemical storage tank containment areas would be lined or paved, curbed/diked, and have sufficient volume to meet regulatory requirements. A site drainage plan would also be developed to prevent routine, process-related operations from affecting the surrounding environment.
Feed Material Handling	The coal storage area may be outdoors or covered. Measures would be taken to reduce releases of coal dust and contamination of stormwater runoff.
Coal Grinding and Slurry Preparation	The coal grinding equipment would be enclosed and any vents would be routed to the tank vent auxiliary boiler. The water used to prepare the coal

**Table 2-12. Possible Pollution Prevention, Recycling, and Reuse Features**

	slurry would be stripped process condensate (recycled).
Gasification, High Temperature Heat Recovery, Dry Char Removal and Slag Grinding	The char produced in gasification would be removed and returned to the first stage of the gasifier (recycled). This improves the carbon conversion in the gasifier and reduces the amount of carbon contained in the gasifier slag.
Slag Handling	The slag dewatering system would generate some flash gas that contains H <sub>2</sub> S. The flash gas would be recycled back to the gasifier via the syngas recycle compressor. Water that is entrained with the slag would be collected and sent to the sour water stripper for recycle.
Sour Water System	Sour water would be collected from slag dewatering and the low temperature heat recovery system, and the NH <sub>3</sub> and H <sub>2</sub> S would be stripped out and sent to the SRU. The stripped condensate would be used to prepare coal slurry. Surplus stripped condensate would be sent to the ZLD unit.
ZLD Unit	The ZLD unit would concentrate and evaporate the process condensate. The ZLD unit would produce high purity water for reuse and a solid filter cake for disposal off site. The ZLD would concentrate and dispose of heavy metals and other constituents in the process condensate. The ZLD would also be a recycle unit because the recovered water could be reused, reducing the total plant water consumption.
Hg Removal Features	The Hg removal unit would use specially formulated activated carbon to capture trace quantities of Hg in the syngas. Hg in the sour water handling system would be captured via activated carbon filters placed upstream of potential release points.
AGR	The AGR system would remove H <sub>2</sub> S and CO <sub>2</sub> from the raw syngas and produce a H <sub>2</sub> -rich synthetic fuel (synfuel) for use in the combined cycle power system. The AGR would produce concentrated H <sub>2</sub> S feed for the SRU and concentrated CO <sub>2</sub> for drying, compression, and sequestration. For co-sequestration activities, a mixed stream of H <sub>2</sub> S and CO <sub>2</sub> would be compressed and dried for sequestration.
SRU	The SRU would convert the H <sub>2</sub> S to elemental sulfur that would be marketed for use as a fertilizer additive or for production of sulfuric acid. The tail gas from the SRU would be recycled back to the gasifier.
Boiler Blowdown and Steam Condensate Recovery	Boiler blowdown and steam condensate would be recovered from the combined cycle power system and gasification facilities, and would be reused as cooling tower makeup water.
Training and Leadership	All corporate and plant personnel would be trained on continuous improvement in environmental performance, especially as such training and programs apply to 1) setting, measuring, evaluating and achieving waste reduction goals; and 2) reporting the results of such programs in annual reports made available to the public.

## 2.5.7 CONSTRUCTION PLANS

### 2.5.7.1 Construction Staging and Schedule

The FutureGen Project facilities would be constructed over the course of up to 44 months, including the installation of utility lines and connections, sequestration site wells and equipment, and supporting structures. Before construction, environmentally sensitive areas at the selected site would be identified so that impacts could be minimized. A Stormwater Pollution Prevention Plan (SWPPP) would be developed to identify BMPs for erosion prevention and sediment control during construction. The plan would include a description of construction activities and address the following:

- Potential for discharge of sediment or pollutants from the site.
- Location and type of temporary and permanent erosion prevention and sediment control BMPs, along with procedures to be used to establish additional temporary BMPs as necessary for the site conditions during construction.

- Site map with existing and final grades, including dividing lines and direction of flow for all pre- and post-construction stormwater runoff drainage areas located within the project limits. The site map must also include impervious surfaces and soil types.
- Location of areas not to be disturbed.
- Location of areas where construction would be phased to minimize duration of exposed soil.
- Identify surface waters and wetlands, either on site or within 0.5 mile (0.8 kilometer) of the site boundaries, which could be affected by stormwater runoff from the construction site during or after construction.
- Methods to be used for final stabilization of all exposed soil areas.

Initial site preparation activities may include, depending on the site selected, building access roads, clearing brush and trees, leveling and grading the site, connecting to utilities, and dewatering activities. Construction of temporary parking, offices, and material storage areas would involve the use of large earthmoving machines to clear and prepare the site. Trucks would bring fill material for roadways and the power plant site, remove harvested timber, remove debris from the site, and temporarily stockpile materials. Construction crews would spread gravel and road base for the temporary roads, material storage areas, and parking areas.

During construction, worker vehicles, heavy construction vehicles, diesel generators, and other machinery and tools would generate emissions. Fugitive dust would result from excavation, soil storage, and earthwork. Construction-related emissions and noise would be minimized by running electricity to the site from the local utility provider to reduce reliance on diesel generators and by wetting soil to reduce dust during earthwork.

### **2.5.7.2 Construction Materials and Suppliers**

Construction material would be delivered to the site by truck and rail. An access road to the power plant site would be developed for construction traffic and completion of the rail spur at the start of construction activities would allow some plant equipment to be delivered by rail. An estimated 20 trucks, and approximately two trains per week would deliver material to the site on a daily basis.

During construction, temporary utilities would be extended to construction offices, worker trailers, lay down areas, and construction areas. The local electricity service would provide temporary construction power. Temporary generators could also be used until the temporary power system would be completed. Construction crews would position temporary lighting for safety and security. Local telecommunication lines would be installed for phone and electronic communications.

Water would be required during construction for various purposes, including personal consumption and sanitation, concrete formulation, preparation of other mixtures needed to construct the facilities, equipment washdown, general cleaning, dust suppression, and fire protection (DOE, 2007).

### **2.5.7.3 Construction Labor**

Based on other coal-fueled power plant construction projects, it is estimated that an average of 350 construction workers would be employed throughout the project; however, during peak construction the projected number of employees could be as many as 600 to 700 workers on site (DOE, 2007). The Alliance expects that labor would be supplied through the local building trades. It is estimated that construction workers would work a 50-hour work week and that construction activity would not always be restricted to daytime hours.

#### **2.5.7.4 Construction Safety Policies and Programs**

Emergency services during construction would be coordinated with the local fire departments, police departments, paramedics, and hospitals. A first-aid office would be located on site for minor first-aid incidents. Trained and certified health, safety, and environmental personnel would be on site to respond to and coordinate emergency response. All temporary facilities would have fire extinguishers, and fire protection would be provided in work areas where welding work would be performed.

The natural gas and CO<sub>2</sub> pipeline facilities would be designed, constructed, tested, and operated in accordance with applicable requirements included in the Department of Transportation regulations in 49 CFR Part 192, Transportation of Natural and Other Gas by Pipeline: Minimum Federal Safety Standards, and other applicable federal and state regulations, including U.S. Department of Labor Occupational Safety and Health Administration requirements. These regulations provide for adequate protection for the public and workers and prevention of natural gas pipeline accidents and failures. Among other design standards, 49 CFR Part 192 specifies pipeline materials and qualifications, minimum design requirements, and protection from internal, external, and atmospheric corrosion.

#### **2.5.7.5 Construction Waste**

Construction of the FutureGen Project would generate certain amounts of waste. The predominant waste streams during construction would include vegetation, soils, and debris from site clearing; scrap metal; hydrostatic pressure test (hydrotest) water; used oil; surplus materials; pallets and other packaging materials; and empty containers.

Surplus and waste materials would be recycled or reused to the extent practical. If feasible, removed site vegetation would be salvaged for pulp and paper production, or recycled for mulch. Construction water use would be heaviest during the CO<sub>2</sub> pipeline testing phase. Hydrotest water would be reused for subsequent pressure tests if practical. Spent hydrotest water would be tested to determine if it exhibits hazardous characteristics (e.g., traces of pipe oil or grease). If hazardous, the hydrotest water would be sent off site for treatment; if non-hazardous, it would be routed to the detention basin for discharge to local surface waters (in accordance with the National Pollutant Discharge Elimination System [NPDES] permit). Potential scrap and surplus materials, and used lubricant oils would be recycled or reused to the maximum extent practical.

The Alliance would ultimately be responsible for the proper handling and disposal of construction waste. However, construction management, contractors, and their employees would be responsible for minimizing the amount of waste produced by construction activities. They would also be expected to adhere to all project procedures and regulatory requirements for waste minimization and proper handling, storage, and disposal of hazardous and non-hazardous waste. Each construction contractor would be required to include waste management in their overall project health, safety, and environmental site plans. Typical construction waste management activities may include:

- Dedicated areas and a system for waste management and segregation of incompatible waste. Waste segregation should occur at time of generation.
- A waste control plan detailing waste collection and removal from the site. The plan would identify where waste of different categories would be collected in separate stockpiles, bins, etc. and clear, appropriate signage would be required to identify the category of each collection stockpile, bin, etc.
- Storage of hazardous waste, as defined by the applicable regulations, separately from non-hazardous waste (and other, non-compatible hazardous waste) in accordance with applicable regulations, project-specific requirements, and good waste management practices.

- Periodic inspections to verify that waste are properly stored and covered to prevent accidental spills and to prevent waste from being blown away.
- Appropriately labeled waste disposal containers.
- Good housekeeping procedures. Work areas would be left in a clean and orderly condition at the end of each working day, with surplus materials and waste transferred to the waste management area.

### **2.5.8 OPERATION PLANS**

As stated in Section 2.2, DOE-sponsored activities under the FutureGen Project would include 1 year of startup (scheduled to begin in 2012); 3 years of plant operation, testing, and research; followed by 2 years of additional geologic monitoring of the sequestered CO<sub>2</sub>. Section 2.2 describes expected research activities. However, it is generally expected that the plant would continue to operate for at least 20 to 30 years and possibly up to 50 years. After the DOE-sponsored research activities conclude, the Alliance and DOE would develop a disposition plan that addresses the future management and operation of the power plant.

#### **2.5.8.1 Operational Labor**

Operator hiring and training would begin about 1 year before the commencement of startup. Gasification area personnel would need extensive training in plant operations, reactive chemicals, and safety, industrial hygiene, and environmental compliance similar to that of operators in refineries and chemical plants. Process simulators would be used as part of the training program. Generally, the staff would consist of management and engineers, shift supervision and operations management, and shift operating personnel. The operations staff would be integrated into the commissioning team so that they would have hands-on experience with the power plant when each system becomes operational after construction.

In addition to operations and management personnel, the FutureGen Project would require qualified staffing in the following areas: power production planning; equipment maintenance; procurement; research and development; health, safety, and environmental protection; administrative support; benefits/human relations; and other necessary functions. The Alliance estimates that the plant would employ approximately 200 full-time workers (FG Alliance, 2006g).

#### **2.5.8.2 Health and Safety Policies and Programs**

Facility design features and management programs would be established to address hazardous materials storage locations, emergency response procedures, employee training requirements, hazard recognition, fire control procedures, hazard communications training, personal protective equipment training, and reporting requirements. For accidental releases, significance criteria would be determined based on federal, state, and local guidelines, and on performance standards and thresholds adopted by responsible agencies.

Basic approaches to prevent spills to the environment include comprehensive containment and worker safety programs. The comprehensive containment program would ensure the use of appropriate tanks and containers, as well as proper secondary containment using walls, dikes, berms, curbs, etc. Worker safety programs would ensure that workers are aware of, and trained in, spill containment procedures and related health, safety and environmental protection policies.

## **2.5.9 POST-OPERATION ACTIVITIES**

### **2.5.9.1 Post-Injection Monitoring**

One goal of the FutureGen Project is to prove the safe and effective storage of CO<sub>2</sub> in a deep saline formation. At a minimum, post-injection monitoring activities would be conducted in accordance with applicable UIC regulations and permit conditions. The UIC program is evolving to specifically address geologic sequestration and its long-term safety. At this time, it is difficult to precisely predict the types and frequency of post-operational monitoring and testing that may be required under the UIC program.

However, it is likely that seismic and atmospheric monitoring surveys would occur periodically after closure of the injection site. Some subset of monitoring equipment and structures installed during the period of injection may be kept in place to assess long-term, post-closure changes in surface deformation, soil gas, or atmospheric fluxes in CO<sub>2</sub> (FG Alliance, 2006g).

Both the Alliance and DOE acknowledge the need for continued monitoring of the sequestered CO<sub>2</sub> during the period of continued plume expansion or migration following cessation of injection. During the co-funded period of the project, the Alliance would apply a variety of monitoring techniques in an effort to identify those that provide the most useful and practical means of determining movement of CO<sub>2</sub> and storage integrity of the formation of the CO<sub>2</sub>.

As part of the Full Scope Cooperative Agreement activities, DOE and the Alliance will develop a plan for continued monitoring of the sequestered CO<sub>2</sub> after completion of the project.

### **2.5.9.2 Final Closure Phase Provisions**

The planned life of the FutureGen Project would be 20 to 30 years. However, if the facility is still economically viable, it could be operated up to 50 years. A closure plan would be developed at the time that the power plant was to be permanently closed. The removal of the facility from service, or decommissioning, may range from “mothballing” to the removal of all equipment and facilities, depending on conditions at the time. The closure plan would be provided to state and local authorities as required.

Upon completion of CO<sub>2</sub> injection, all surface facilities would be decommissioned, including connections between the power plant and injection wells. All exposed pipes, along with other surface facilities, would be decommissioned and removed during site closure. All wells drilled for injection or monitoring, and that intercept the target formation, would be plugged and abandoned in accordance with state and federal regulations. However, some monitoring wells could remain in place, to monitor the long-term integrity of the caprock and to test for potential leakage into aquifers above the CO<sub>2</sub> reservoir.

## **2.6 FUTURE ACTIVITIES**

### **2.6.1 FOLLOW-ON DECISIONS AND PLANNING**

No sooner than 30 days after EPA publishes a Notice of Availability (NOA) of the Final EIS, DOE will publish a Record of Decision (ROD) in the *Federal Register* that explains the agency’s decision on whether to fund the FutureGen Project and, if so, which of the alternative sites, if any, would be acceptable to host the FutureGen Project.

### 2.6.1.1 Design Development and Refinement

The design of the power plant and CO<sub>2</sub> injection process would continue to be refined until commencement of construction. Some of the assumptions made in this EIS may be modified as the design progresses. The site selected for the project would primarily affect the design elements related to supporting utilities and transportation systems. Additional utility interconnection studies of road and rail designs may be conducted.

### 2.6.1.2 Additional Site Characterization Activities

At the selected site, the Alliance would undertake more detailed site-characterization, which would support site-specific design work. For the power plant site, these activities could include detailed surveys and elevation measurements, soil tests to support foundation design, biological surveys if warranted, and local traffic studies. For the sequestration site, these activities could include installation of exploratory wells, seismic imaging of the target reservoir, small-scale injection tests, and additional computer simulation and modeling of plume fate and transport.

Additional site-specific information would be needed to better determine the injectivity and storage capacity of the target reservoirs as well as the integrity of the caprock. The Alliance would gather this information by drilling one or more exploratory wells into the target formation and undertaking various tests and sampling. While drilling, core samples would be taken from the target formation, the primary seal and portions of the overlying zones to determine the bulk permeability and other geologic characteristics of the rock. Well testing could include pressure and temperature readings or fluid testing as described in Section 2.5.2.2.

Well drilling activities would include the creation of a temporary or permanent access road (paved or unpaved) to the well site and installing a temporary catch basin to store produced saline water and drill cuttings. Because these wells would be thousands of feet deep, a single well could require 3 to 5 weeks of drilling depending on the well depth, diameter and formation properties.

The Alliance may also conduct seismic surveys (see Section 2.5.2.2) which are generally conducted over a very large area (larger than the predicted plume radius). The Alliance would secure permission prior to conducting these surveys from affected land owners to gain access, run geophone lines and possibly dig shot-holes. While these surveys use either very small amounts of explosives or heavy steel vibrators to produce sound waves that would be reflected by the subsurface rock layers to varying degrees, vibrations are rarely felt at the surface because the energy levels are small.

### 2.6.1.3 Future NEPA Activities

Based on the results of the additional site-characterization and site-specific preliminary design, DOE will complete a Supplement Analysis to determine whether a Supplemental EIS must be prepared. A Supplemental EIS would be required if there are substantial changes to the Proposed Action or significant new circumstances or information relevant to environmental concerns. If DOE completes a Supplement Analysis or Supplemental EIS, DOE would determine whether to revise *the* ROD.

## 3. SUMMARY OF ENVIRONMENTAL CONSEQUENCES

### 3.1 COMPARISON OF IMPACTS OF ALTERNATIVES

#### 3.1.1 INTRODUCTION

This chapter provides a comparison of the potential environmental impacts to physical, natural, cultural, and socioeconomic resources for all four site alternatives for the FutureGen Project. *The Best and Final Offer (BAFO) information for the Mattoon and Odessa sites, and their potential impacts, have been addressed in Sections S.4.2.4, S.4.3, 2.4.4, 2.4.5, and Tables S-12 and 3-3, and therefore are not reflected in the text of this section.*

Many of the differences in potential impacts described in this chapter relate to project features that are dependent upon the alternative site. Although the FutureGen Power Plant would be very similar regardless of the location that hosts the facility, there are notable differences in the approaches for the supporting infrastructure at the different sites. Table 3-1 highlights these differences to provide the reader with some context when examining potential impacts. The major differences among the alternatives from a siting perspective relate to the extent and need for utility corridors (e.g., process water pipeline, potable water pipeline, sanitary wastewater pipeline, natural gas pipeline, electrical transmission line, and carbon dioxide [CO<sub>2</sub>] pipeline) and whether these lines would need new right-of ways (ROWs) or could be constructed in existing ROWs. Other differences include the approach to supply process water to the site: Mattoon proposes to use wastewater effluent from local wastewater treatment plants (WWTPs); Tuscola proposes to use primarily Kaskaskia River water pumped from an industrial neighbor's reservoir; and Jewett and Odessa propose to use groundwater sources.

#### 3.1.2 AIR QUALITY

DOE reviewed public data and studies performed by the FutureGen Alliance, Inc. (the Alliance) to determine the potential for impacts based on air pollutant emissions from the construction and operation of the FutureGen Project. The FutureGen Project emissions of criteria air pollutants were modeled to determine potential changes to ambient air quality in relation to the national ambient air quality standards (NAAQS). Additionally, hazardous air pollutant (HAP) and mercury (Hg) emissions were estimated. Impacts related to visibility, regional haze, and nitrogen and sulfur deposition in Class I areas were also considered. DOE also reviewed the applicability of air regulations and regional air quality plans and the potential for impacts from vapor plumes and odors.

DOE used conservative emissions estimates for the Environmental Impact Statement (EIS) analysis that the Alliance developed using the highest pollutant emission rates for various technology options being considered for the FutureGen Project, as described in Section 2.5.1.1. The FutureGen Project's maximum emissions (including steady-state emissions and unplanned restart emissions) of air pollutants are estimated to be:

- Sulfur dioxide (SO<sub>2</sub>) – 543 tons (493 metric tons) per year;
- Nitrogen dioxides (NO<sub>2</sub>) – 758 tons (688 metric tons) per year;
- Particulate matter with a diameter of 10 micrometers or less (PM<sub>10</sub>) – 111 tons (101 metric tons) per year;
- Carbon monoxide (CO) – 611 tons (554 metric tons) per year;
- Volatile organic compounds (VOCs) – 30 tons (27 metric tons); and
- Hg – 0.011 ton (0.010 metric ton) per year.

Table 3-1. Project Features for Alternative Sites

ROW	Mattoon		Tuscola		Jewett		Odessa	
<b>Estimated Lengths of Potable Water Pipeline (miles [kilometers])</b>								
New ROW	—		<1 (<1.6) <sup>1</sup>		<1 (<1.6) <sup>2</sup>		— <sup>3</sup>	
Existing ROW	1 (1.6)		—		—		— <sup>3</sup>	
Total	1 (1.6)		<1 (<1.6)		<1 (<1.6)		— <sup>3</sup>	
<b>Estimated Lengths of Process Water Pipeline (miles [kilometers])</b>								
	Mattoon <sup>4</sup>	Charleston <sup>4</sup>						
New ROW	2 (3.2)	—	1.5 (2.4)		<1 (<1.6) <sup>2</sup>		24 – 54 (38.6 – 86.9)	
Existing ROW	4.2 (6.8)	8.1 (13.0)	—		—		—	
Total	6.2 (10)	8.1 (13.0)	1.5 (2.4)		<1 (<1.6)		24 – 54 (38.6 – 86.9)	
<b>Estimated Lengths of Sanitary Wastewater Pipeline (miles [kilometers])</b>								
	Mattoon WWTP		On-site Option	WWTP Option <sup>5</sup>	On-Site		On-site	
New ROW	—		—	0.9 (1.4)	—		—	
Existing ROW	1.25 (2.0)		—	—	—		—	
Total	1.25 (2.0)		—	0.9 (1.4)	—		—	
<b>Estimated Lengths of Electrical Grid Interconnection Power Line (miles [kilometers])</b>								
	Option 1 (138-kV)	Option 2 (345-kV)	Option 1 (138-kV)	Option 2 (345-kV)	Option 1 <sup>6</sup> (345-kV)	Option 2 (138-kV)	N Option (138-kV)	S Option (138-kV)
New ROW	0.5 (0.8)	16 (25.7)	0.5 (0.8)	3 (4.8)	—	2 (3.2)	0.7 (1.1)	—
Existing ROW	0 – 2 (3.2)	—	—	14 (22.5)	—	—	—	1.8 (2.9)
Total	0.5 (0.8) – 2.5 (4)	16 (25.7)	0.5 (0.8)	17(27.4)	—	2 (3.2)	0.7 (1.1)	1.8 (2.9)
<b>Estimated Lengths of Natural Gas Supply Pipeline (miles [kilometers])</b>								
New ROW	0.25 (0.4) <sup>7</sup>		— <sup>8</sup>		— <sup>8</sup>		— <sup>8</sup>	
Existing ROW	—		— <sup>8</sup>		— <sup>8</sup>		— <sup>8</sup>	
Total	0.25 (0.4)		— <sup>8</sup>		— <sup>8</sup>		— <sup>8</sup>	
<b>Estimated Lengths of CO<sub>2</sub> Pipeline (miles [kilometers])</b>								
	On-site CO <sub>2</sub> pipeline		Crossing existing ROWs where applicable <sup>9</sup>		Using A-H Segment <sup>10</sup>	Using B-H Segment <sup>10</sup>		
New ROW	—		11 (17.7)		9 (14.5)	6 (9.7)	2 (3.2) to 14 (22.5) <sup>11</sup>	
Existing ROW	—		Not determined		43 (69.2)	53 (85.3)	58 (93.3) <sup>12</sup>	
Total	—		11 (17.7)		52 (83.7) <sup>13</sup>	59 (95.0) <sup>13</sup>	72 <sup>13</sup> (111)	

<sup>1</sup> Potable water supply would tap into an existing line operated by the Illinois American Water Company.<sup>2</sup> Wells would be located either on or near the plant site.<sup>3</sup> Potable water would be obtained through the same pipeline as the process water supply.<sup>4</sup> Mattoon would obtain process water from the combined effluents of the municipal WWTP for the cities of Mattoon and Charleston via separate pipelines.<sup>5</sup> Discharge to Lyondell-Equistar Chemical Company WWTP.<sup>6</sup> Would connect to a 345-kilovolt (kV) line bordering the site.<sup>7</sup> The Site Proponent has obtained an option for additional land for the pipeline ROW that would give flexibility to connect to a natural gas mainline located 0.25 mile (0.4 kilometer) east of the proposed site.<sup>8</sup> Existing natural gas pipeline traverses site or borders site boundary.<sup>9</sup> Pipeline would be constructed parallel to Country Road (CR) 750E and 700E; cross existing state, county, and municipal ROWs; and occupy new ROW where needed.<sup>10</sup> Corridor would be the same except for initial alignments (A-C or B-C) connecting to plant site.<sup>11</sup> If existing Kinder Morgan pipeline cannot be used, new pipeline would be constructed (assumes new ROW).<sup>12</sup> If existing Kinder Morgan pipeline can be used.<sup>13</sup> Total ROW is not actual distance between the power plant site and the sequestration site.

Intermittent increases in emissions over steady-state facility emissions rates would be expected during plant upsets because of the need to flare process gases (syngas) for a short period of time (i.e., minutes or hours), resulting in unplanned restart emissions. These unplanned restart emissions are included in the FutureGen Project's estimates of maximum annual air emissions. The annual maximum emissions of SO<sub>2</sub>, NO<sub>2</sub>, PM<sub>10</sub>, and CO estimated for the FutureGen Project would exceed the Prevention of Significant Deterioration (PSD) major source thresholds of 100 tons (91 metric tons) per year. The estimated annual HAP and Hg emissions would be below the PSD major source threshold of 10 tons (9.1 metric tons) per year. Because the power plant features would be the same at each alternative site, estimated source emissions of criteria air pollutants, HAPs, and CO<sub>2</sub> would be the same. However, the potential impacts of these emissions would be dependent on the existing ambient air quality at each site.

Construction of the proposed power plant and sequestration facilities, utility corridors, and transportation corridors would result in localized increases in ambient concentrations of SO<sub>2</sub>, NO<sub>x</sub>, CO, VOCs, PM<sub>10</sub>, and particulate matter with diameter of 2.5 micrometers or less (PM<sub>2.5</sub>). These emissions would occur as a result of the use of construction equipment and vehicles, including trucks, bulldozers, excavators, backhoes, loaders, dump trucks, forklifts, pumps, and generators, as well as earth moving activities. For all sites, impacts on local air quality would be short-term (i.e., during the construction phase).

Air modeling was conducted to assess the potential for impacts to ambient air quality conditions at each site from operating the proposed power plant. Because local air quality monitoring data were not available for any of the alternative sites, monitoring data from the closest attainment area to each site were used as a surrogate data for the local background ambient air quality. There are no local or regional air quality management plans for the area of any of the alternative sites. However, the regions of influence (ROIs) for the proposed locations are considered to be in attainment of the NAAQS. Table 3-2 presents the predicted concentration increases for criteria air pollutants that would result from FutureGen Project emissions and the resulting ambient concentrations.

The FutureGen Project would not result in an exceedance of the NAAQS at any of the alternative sites. However, because of high ambient concentrations of PM<sub>2.5</sub>, several of the sites would approach the PM<sub>2.5</sub> 24-hour standard, with Mattoon being the closest at 93 percent of the standard. Tuscola would be at 92 percent of the standard, Jewett would be at 86 percent, and Odessa would be at 59 percent. For the annual PM<sub>2.5</sub> standard, Jewett would be at 92 percent of this standard, while Mattoon and Tuscola would be at 84 percent, each. Odessa would be at 52 percent of the annual PM<sub>2.5</sub> standard.

For areas that are already in compliance with the NAAQS, the PSD requirements provide maximum allowable increases in concentrations of pollutants, which are expressed as increments. During plant upset scenarios, the unplanned restart emissions are higher than steady-state (i.e., from normal plant operations) emissions, especially SO<sub>2</sub> emissions. This could result in exceedances of short-term 3-hour SO<sub>2</sub> Class II PSD increments at the Mattoon, Tuscola, Jewett, and Odessa sites and short-term 24-hour SO<sub>2</sub> Class II PSD increments at the Jewett Site. However, the probabilities of such exceedances are very low. For the 3-hour SO<sub>2</sub> PSD increment, the probability of exceedance during upset conditions would be 0.23 percent at the Mattoon Site and the maximum distance of impact would be 0.67 mile (1.1 kilometers); 0.22 percent at the Tuscola Site and the maximum distance of impact would be 2.55 miles (4.1 kilometers); 1.66 percent at the Jewett Site and the maximum distance of impact would be 0.58 mile (0.9 kilometer); and 0.09 percent at the Odessa Site and the maximum distance of impact would be 0.79 mile (1.3 kilometers). At the Jewett Site, the probability of exceeding the 24-hour SO<sub>2</sub> PSD increment during unplanned restart would be 0.2 percent and the maximum distance of impact would be 0.6 mile (0.9 kilometer). During normal plant operation, the FutureGen Project would consume a maximum of 1.75 percent (24-hr PM<sub>10</sub>) at the Mattoon Site, 1.31 percent (24-hr PM<sub>10</sub>) at the Tuscola Site, 2.76 percent (24-hr PM<sub>10</sub>) at the Jewett Site, and 1.38 percent (annual NO<sub>2</sub>) at the Odessa Site.

**Table 3-2. Predicted Maximum Concentrations and Resulting Ambient Concentrations**

Pollutant	NAAQS <sup>1</sup>	Mattoon		Tuscola		Jewett		Odessa	
		FG <sup>2</sup>	FG+A <sup>3</sup>						
<b>Concentrations During Normal Plant Operation (Steady-State)<sup>4</sup></b>									
SO <sub>2</sub> , 3-hr	1,300	0.717	123.75	0.536	123.57	0.820	34.85	0.542	52.89
SO <sub>2</sub> , 24-hr	365	0.262	70.93	0.197	70.87	0.415	13.51	0.188	13.28
SO <sub>2</sub> , Annual	80	0.184	10.65	0.048	10.52	0.483	3.10	0.248	5.49
NO <sub>2</sub> , Annual	100	0.256	30.35	0.067	30.09	0.674	27.01	0.346	15.40
PM <sub>10</sub> , 24-hr	150	0.524	57.86	0.393	57.73	0.829	55.83	0.376	51.71
PM <sub>10</sub> , Annual	50	0.038	26.04	0.010	26.01	0.099	26.10	0.051	18.05
PM <sub>2.5</sub> , 24-hr	35	0.524	32.46	0.393	32.33	0.829	30.16	0.376	20.71
PM <sub>2.5</sub> , Annual	15	0.038	12.54	0.010	12.51	0.099	13.80	0.051	7.75
CO, 1-hr	40,000	11.333	5,622.76	9.470	5,620.90	10.447	4,018.62	8.418	7,234.37
CO, 8-hr	10,000	5.005	3,462.94	4.729	3,462.66	7.879	1,954.70	4.855	3,906.86
<b>Concentrations During Plant Upset Events (Unplanned Restart)<sup>5</sup></b>									
SO <sub>2</sub> , 3-hr <sup>6</sup>	1,300	511.819	634.85	511.958	634.99	511.913	545.94	511.979	564.33
SO <sub>2</sub> , 24-hr <sup>6</sup>	365	88.000	158.67	67.000	137.67	89.500	102.59	73.000	86.09

<sup>1</sup> NAAQS expressed in micrograms per meter cubed ( $\mu\text{g}/\text{m}^3$ )

<sup>2</sup> FG = Potential concentration increase from FutureGen emissions expressed in  $\mu\text{g}/\text{m}^3$

<sup>3</sup> FG+A = Resulting ambient concentrations expressed in  $\mu\text{g}/\text{m}^3$ . Include FutureGen plus existing ambient concentrations.

<sup>4</sup> The normal operating scenario is based on steady-state emissions and is a period when the plant is operating without flaring, sudden restarts, or other upset conditions.

<sup>5</sup> Unplanned restart emissions of PM<sub>10</sub> and PM<sub>2.5</sub> do not occur during plant upset events. Unplanned restart emissions of NO<sub>2</sub> and CO would be lower than steady-state emissions (i.e., <2 percent and <0.2 percent, respectively), therefore impacts would be lower than normal plant operations. Impacts of plant upset event is based on unplanned restart emissions and is a period when a serious malfunction of any part of the IGCC process train usually results in a sudden shutdown of the combined cycle units gas turbine and other plant components.

Class I Areas, those areas designated as pristine, require more rigorous safeguards to prevent deterioration of air quality and include many national parks and monuments, wilderness areas, and other areas as specified in 40 Code of Federal Regulations (CFR) Part 51.166(e) (40 CFR 51.166). The distance to the closest Class I Area for each site is 190 miles (305 kilometers) for Mattoon, 204 miles (328 kilometers) for Tuscola, 240 miles (386 kilometers) for Jewett, and 110 miles (177 kilometers) for Odessa. These distances are well beyond the 62 miles (100 kilometers) distance required to consider impacts to Class I areas under the PSD regulations. Because of the great distance to Class I areas, no air quality impacts are expected to these resources as a result of FutureGen Project emissions.

The FutureGen Power Plant at each of the proposed sites would be subject to requirements of the Acid Rain Program and would be required to offset SO<sub>2</sub> and NO<sub>x</sub> emissions. Because of the advanced FutureGen Project technology, the proposed power plant would emit Hg below the Clean Air Mercury Rule (CAMR) limits. Because of the size of each proposed site, odors of hydrogen sulfide (H<sub>2</sub>S) and ammonia are expected to be limited to within the facility boundary. There is the potential for solar loss, fogging, icing, or salt deposition because of the vapor plume from the cooling tower and gas turbine exhaust stack(s). However, because of the size of the proposed properties, impacts related to vapor plumes would be limited to within the facility boundary and would not interfere with quality of life in the area of any of the four sites.

The FutureGen Project would begin to capture and sequester CO<sub>2</sub> when the facility begins operations. With an 85 percent capture initially, FutureGen would emit to the atmosphere 0.18 to 0.45 million tons per year (0.17 to 0.41 metric tons per year). If the facility achieves the 90 percent capture and sequestration goal, FutureGen would emit 0.12 to 0.28 million ton (0.11 to 0.25 million metric ton [MMT]) of CO<sub>2</sub> per year when sequestration is taking place. One of the goals of the FutureGen Project is to capture and permanently sequester 90 percent of the CO<sub>2</sub> from the plant. Although the facility would still emit a certain amount of CO<sub>2</sub>, it would test and implement the technology needed to advance the near-zero emissions concept. The advancement of near-zero-emission power plants could have a long-term beneficial impact of reducing greenhouse gas (GHG) emissions related to coal-fueled energy production.

### 3.1.3 CLIMATE AND METEOROLOGY

Climate and meteorology data were evaluated for each of the four candidate sites to provide a comparison of potential risks from extreme weather conditions at the sites. Data collected included temperature norms and extremes, average annual rainfall and snowfall, average wind speeds, a wind rose, periods of drought, and a history of extreme weather events such as ice storms, tornados, and floods.

The region of Illinois that includes the Mattoon and Tuscola sites has a greater potential for extreme weather events and can expect two or three hail storms, one snowfall of 6 inches (15.2 centimeters) or more, and one ice storm per year. Snowfall, hailstorms, and ice storms in the Jewett and Odessa regions are rare. All of the proposed power plant sites are located well above the 100-year floodplain (see Section 3.1.8).

*Over a 50 year period, within a 850 square mile (2,202 square kilometer) “normalized” area of the sites, there would be statistically (within that large area) the following numbers of F1 or higher tornadoes: 24 for Mattoon, 10 for Tuscola, 7 for Jewett and 6 for Odessa. Because the power plant sites would comprise a small fraction of that land area (less than 0.1 percent), the probability of a tornado impacting any of the sites is low.* All four sites could experience severe or extreme drought.

### 3.1.4 GEOLOGY

The project would sequester (inject) CO<sub>2</sub> in deep geologic formations (e.g., saline formations) and could impact geologic formations. Similarly, the geologic conditions or instabilities of the formation could impact the secure storage of the injected CO<sub>2</sub>. Therefore, the potential for impacts was reviewed based on the occurrence of local seismic destabilization and damage to structures; occurrence of geologic-related events (e.g., earthquake, landslides, and sinkholes); destruction of high-value mineral resources or unique geologic formations, or rendering them inaccessible; alteration of geologic formations; migration of sequestered CO<sub>2</sub> through faults, inadequate caprock or other pathways such as abandoned or unplugged wells; human exposure to radon gas; and noticeable ground heave or upward vertical displacement of the ground surface.

The four sites were deemed reasonable alternatives because they met key geologic qualifying criteria that would increase the likelihood that injected CO<sub>2</sub> would remain permanently sequestered. These criteria addressed, but were not limited to: storage capacity; injection rates and formation permeability; primary seal thickness and expanse; and proximity of active or hydraulically transmissive faults.

DOE based its evaluation on a review of reports from state geologic surveys and information provided by the Alliance that pertain to the geological features of the proposed sequestration formations. DOE reviewed the numerical reservoir modeling of CO<sub>2</sub> injection, conducted by the Alliance, which showed that each site would be able to achieve the goals of the FutureGen Project. The predicted

maximum extent of the CO<sub>2</sub> plume in the formation for injection wells located at each site was considered to be the subsurface ROI. To achieve an injection target of 55 million tons (50 MMT) of CO<sub>2</sub>, an injection period of 20 years was used for the 2.8 million tons (2.5 MMT) per year scenario, and an injection period of 50 years was used for the 1.1 million tons (1 MMT) per year scenario. However, the reservoir model was run for 50 years in both cases. For all sites except Jewett, the largest plume radius predicted by the numerical modeling was associated with the injection of 1 MMT for 50 years. As a result of the modeling, it is estimated that Jewett would have the largest plume radius associated with the injection of 2.8 million tons (2.5 MMT) for 20 years, followed by 30 years of gradual plume spreading. These differences in plume size are due to site-specific geologic conditions. The predicted extent of the CO<sub>2</sub> plume for each candidate site would be as follows:

- Mattoon – Radius of 1.2 miles (1.9 kilometers); area equal to 2,789 acres (1,129 hectares), based on 1.1 million tons (1.0 MMT) injected annually for 50 years.
- Tuscola – Radius of 1.1 miles (1.8 kilometers); area equal to 2,432 acres (984 hectares), based on 1.1 million tons (1.0 MMT) injected annually for 50 years.
- Jewett – Radius of 1.7 miles (2.7 kilometers); area equal to 5,484 acres (2,219 hectares) per well *for two wells*, based on 2.8 million tons (2.5 MMT) injected annually for the first 20 years (radius within Woodbine formation) of a 50-year period.
- Odessa – Radius of 1.0 mile (1.6 kilometers); area equal to 2,136 acres (864 hectares) per well *for three wells*, based on 1.1 million tons (1.0 MMT) injected annually for the first 20 years of a 50-year period.

Each site is located in a tectonically stable region where earthquakes are not common and typically are no higher than medium in intensity. Significant structural damage to buildings from seismic events is rare. The New Madrid fault system is the closest major seismic zone for three of the sites and is approximately 200 miles (322 kilometers) from Mattoon, 230 miles (370 kilometers) from Tuscola, 400 miles (644 kilometers) from Jewett, and more than 800 miles (1,287 kilometers) from Odessa. The Rio Grande Rift system creates the nearest seismic zone to the Odessa Site and is at least 210 miles (338 kilometers) to the southwest of the proposed power plant site. The Mexia-Talco is the closest major fault to Jewett at a distance of 30 to 35 miles (48.3 to 56.3 kilometers). There are no high-value or unique geologic resources or features at any of the sites.

The proposed sequestration reservoir at each candidate site would consist of brine-filled, fine-grained sandstone. The estimated injection depths for these formations would be:

- 1.3 to 1.6 miles (2.1 to 2.6 kilometers) for Mattoon for the Mt. Simon sandstone; 0.9 mile (1.4 kilometers) for the St. Peter sandstone, optional.
- 1.3 to 1.5 miles (2.1 to 2.4 kilometers) for Tuscola for Mt. Simon; 0.9 mile (1.4 kilometers) for the St. Peter sandstone, optional.
- 1 to 1.1 miles (1.6 to 1.8 kilometers) for Jewett for the Woodbine formation; 1.7 to 2.1 miles (2.7 to 3.4 kilometers) for the Travis Peak formation, secondary.
- 0.4 to 1 mile (0.6 to 1.6 kilometers) for Odessa *lower target* (the Delaware Mountain Group) and *Odessa upper target (lower part of the Queen formation)*.

Injection of CO<sub>2</sub> at any of the proposed sites would initially cause a slight acidification of the formation water. However, these alterations are expected to be minimal because all proposed reservoir formations consist primarily of quartz, which is very resistant to geochemical reactions. Over time (hundreds to thousands of years) the CO<sub>2</sub> would react with formation minerals causing slight alterations and cause the CO<sub>2</sub> to move from a gas or liquid phase to a solid phase. Using conservative assumptions on increases in the potential for CO<sub>2</sub> to displace radon, DOE concluded that it was unlikely that the U.S. Environmental Protection Agency (EPA) established action levels for radon would be exceeded as a result of CO<sub>2</sub> injection at any of the sequestration sites.

The primary caprock formations directly overlying the proposed sequestration formations at each of the four sites exhibit low permeability and are laterally continuous with estimated thicknesses of 400 to 700 feet (122 to 213 meters). DOE believes it unlikely that injection of CO<sub>2</sub> would cause fracturing or other alterations of the geologic formations at any of the sites. Site-specific fracture pressures would be established as part of the underground injection control (UIC) permitting process, and pressures in the formations would be monitored during injection to avoid or minimize fracturing. For the same reasons, it is unlikely that injection of CO<sub>2</sub> would cause new faults to form or induce seismicity by causing existing faults to slip. Current microseismic monitoring technology can detect very small releases of energy, and injection pressures could be reduced to prevent fault slippage.

Faults, wells, or other penetrations in the caprock could act as conduits for the migration of CO<sub>2</sub> from the sequestration formation. However, as part of the site-specific assessment to be conducted on the selected site, geophysical surveys would be conducted to locate existing wells and, if found to be improperly abandoned, such wells could be properly sealed and abandoned to meet state regulations and prevent CO<sub>2</sub> leakage. Information on faults and penetrations to the primary caprock formations for the four candidate sites is summarized below:

- At the Mattoon Sequestration Site, the Site Proponent conducted two-dimensional (2D) seismic tests and no transmissive faults were detected. The possibility exists for faults associated with a nearby anticline; however, they are likely to be sealing faults. No known penetrations of the primary caprock exist within the subsurface ROI, although numerous shallower petroleum exploration and production wells are located within the ROI.
- At the Tuscola Sequestration Site, the Site Proponent conducted 2D seismic tests and no transmissive faults were detected. A strong possibility exists for faults associated with the steep flank of a nearby anticline; however, they are likely to be sealing faults. No known penetrations of the primary caprock exist within the subsurface ROI, although numerous shallower petroleum exploration and production wells are located within the ROI.
- At the Jewett Sequestration Site, a fault has been mapped in the subsurface ROI; however, it is likely to be a sealing fault. Multiple surface faults are located within 10 miles (16 kilometers). As many as 57 oil or gas wells may penetrate the primary caprock within the subsurface ROI.
- At the Odessa Sequestration Site, no faults have been mapped in the subsurface ROI or in the general area other than quiescent basement faults located beneath the target formation. As many as 16 petroleum exploration wells may penetrate the primary caprock within the subsurface ROI.

### 3.1.5 PHYSIOGRAPHY AND SOILS

DOE evaluated the FutureGen Project impacts on physiography and soils to analyze the potential for permanent and temporary soil removal, soil erosion and compaction, soil contamination due to spills of hazardous materials, and changes in soil characteristics and composition.

Land disturbance would occur primarily during construction at the proposed power plant sites and sequestration sites, and could result in permanent removal or displacement of soils on up to 200 acres (81 hectares) at the plant site and up to 10 acres (4 hectares) at the sequestration site (at Mattoon the sequestration site would be on the power plant site). The impacts during construction could include erosion or compaction of soils, soil contamination due to spills of hazardous materials, and changes in soil composition (e.g., due to fill) and characteristics (e.g., infiltration rate). These impacts would be comparable for all four proposed FutureGen Project sites and would be minimized through the use of best management practices (BMPs) for erosion control, proper storage of hazardous materials, and spill prevention and response measures. The soils at all four candidate sites generally have low potential for erosion, no potential for landslides (based on topography), and minimal potential for subsidence.

After completion of construction at the power plant and sequestration sites, land disturbance would end, temporarily disturbed areas would be revegetated, and further impacts to soils would be negligible. The potential for soil contamination from minor spills of hazardous materials during operations would be low, based on the use of proper storage facilities and implementation of spill response procedures. The potential for CO<sub>2</sub> to reach the soil after injection into the sequestration reservoir would be negligible and was not considered as a potential cause for impacts.

Land disturbance along utility and transportation corridors would likewise occur primarily during construction and could include erosion or compaction of soils, soil contamination due to spills of hazardous materials, and changes in soil composition (e.g., due to fill) and characteristics (e.g., infiltration rate). After completion of construction along utility and transportation corridors, land disturbance would end, disturbed areas would be revegetated, and further impacts to soils would be negligible. The land areas potentially affected by construction of utilities and transportation features at the four FutureGen Project *alternative* sites would be as follows:

- Mattoon – Up to 25.6 acres (10.4 hectares) of land area for utility corridors and up to 15.9 acres (6.4 hectares) of land area for transportation corridors.
- Tuscola – Up to 32.4 acres (13.1 hectares) of land area for utility corridors and up to 6.7 acres (2.7 hectares) of land area for transportation corridors.
- Jewett – Up to 358 acres (145 hectares) of land area for utility corridors and *no soil disturbance* of land area for transportation corridors.
- Odessa – Up to 341 acres (138 hectares) of land area for utility corridors and up to 1.8 acres (0.7 hectare) of land area for transportation corridors.

### 3.1.6 GROUNDWATER

DOE evaluated the FutureGen Project's potential to adversely affect the availability and current uses of groundwater and the potential to cause impairment of groundwater resources through construction and operational activities. The four sites meet key water availability and groundwater protection qualifying criteria.

Groundwater would not be used during construction at any of the four power plant or sequestration sites. A low probability exists that the surface activities carried out during construction could affect the quality of the groundwater; however, the use of BMPs and spill response procedures would prevent spills from reaching groundwater. Although CO<sub>2</sub> injection wells would be drilled through surficial aquifers used for drinking water, conductor casing would be used during drilling to avoid contamination of surficial aquifers. The three existing surficial groundwater wells located at the Mattoon Site would be properly abandoned in accordance with state and federal regulations to avoid any contamination to the aquifer.

The 3,000-gallon (11,356-liter) per minute demand for process water could be met for all four proposed sites. The proposed Mattoon Power Plant would utilize effluent from local WWTPs (e.g., surface water resources); therefore, direct impacts to the groundwater supply would not be anticipated. The process water for the proposed Tuscola Power Plant would be provided by an existing human-made reservoir that is supplied by the Kaskaskia River, which has the capacity to meet plant demand. The Kaskaskia River flow could be supplemented during periods of drought by the Mahomet aquifer. The supplemental use of this aquifer is not anticipated to affect current groundwater usage or sustainability. Both the proposed Jewett and Odessa sites would rely entirely on existing groundwater resources for process water. The Jewett Site has an excess groundwater availability of  $22.6 \times 10^6$  gallons ( $85.6 \times 10^6$  liters) per minute, and the Odessa Site has an excess groundwater availability of  $2.4 \times 10^6$  to  $13.2 \times 10^6$  gallons ( $9.1 \times 10^6$  to  $50 \times 10^6$  liters) per minute. The available excess groundwater at either site would be

adequate to support the required 3,000 gallons (11,356 liters) per minute process water demand while maintaining aquifer sustainability for current and future uses.

The sequestration of CO<sub>2</sub> in a deep saline formation has the potential to impact groundwater resources, although this possibility is very low due to the depth and geologic characteristics of the sequestration sites. CO<sub>2</sub> injection is a concern for groundwater resources because it has the ability to cause pH changes, mineralization, displacement of brine water into overlying aquifers, mobilization of metals in groundwater, and leaks of CO<sub>2</sub> into other aquifers. However, the four sites were deemed reasonable alternatives in part because they met key geologic and groundwater criteria, including the presence of one or more primary geologic seals and lack of local seismic activity. Furthermore, impacts to groundwater would be minimized through monitoring and mitigation techniques that would identify leaks and leakage pathways that could impair overlying and usable groundwater sources.

Although a low probability, the most likely pathway for upward migration of CO<sub>2</sub> at each proposed site would be through improperly abandoned deep wells that penetrate the main seal of the CO<sub>2</sub> formation. The proposed Mattoon and Tuscola sites contain no known wells that could pose such a risk. The proposed Jewett Site has the greatest number, with up to 57 wells known to penetrate the primary seal in the ROI. The proposed Odessa Site has up to 16 wells that penetrate the primary seal in the ROI. As part of the site-specific assessment to be conducted on the selected site, geophysical surveys would be conducted to locate existing wells that penetrate the primary seal. If found to be improperly abandoned, such wells would be properly sealed and abandoned in accordance with state regulations.

The distance between the CO<sub>2</sub> injection zone and the deepest *underground sources of drinking water*, along with the hundreds of feet of low permeability caprock formations separating them, create an unlikely probability of occurrence for upward migration of CO<sub>2</sub> into *underground sources of drinking water*. The separation between the injection zone and *underground sources of drinking water* is 1.3 miles (2.1 kilometers) at the Mattoon Site, 1.3 miles (2.1 kilometers) at the Tuscola Site, at least 1 mile (1.6 kilometers) at the Jewett Site, and 0.4 mile (0.6 kilometer) at the Odessa Site.

Construction and operations of associated utility and transportation infrastructure are not anticipated to directly impact groundwater resources at any of the four proposed sites. BMPs and spill response procedures would prevent hazardous material spills from reaching groundwater.

### 3.1.7 SURFACE WATER

DOE assessed construction and operation impacts to surface water resources using existing literature, studies and data. The analysis evaluated water resource capacity, water rights and regional management plans, water quality, stormwater patterns, and management plans for each proposed site. As discussed in 3.1.8, the Jewett and Odessa sites (excluding the proposed power plant sites) required field verifications to confirm the existence of the ephemeral and intermittent surface water features.

Construction of the Mattoon Power Plant may impact one jurisdictional, low-quality farm pond (see Section 3.1.8). Construction at the proposed Jewett Power Plant Site may impact several acres of low quality wetlands (see Section 3.1.8). However, due to the available acreage of both sites, these features could be avoided in the final design. There are no surface water resources directly on the proposed Tuscola or Odessa Power Plant sites.

Construction of the proposed water supply pipeline at the Mattoon Site would cross *up to* five surface waters, the proposed CO<sub>2</sub> pipeline *and transmission line* at the Tuscola Site would cross *five* surface waters, the proposed CO<sub>2</sub> pipeline at the Jewett Site would cross approximately 30 surface waters, and the proposed CO<sub>2</sub> and water supply pipelines at the Odessa Site would cross approximately four ephemeral

and intermittent streams. These crossings would potentially cause direct and temporary impacts to these surface waters during construction. Underground utility installation, if open trench methods are used, would cause a direct and temporary impact to surface water resources by potentially diverting stream flow within the area of utility installation and by temporarily increasing turbidity and sedimentation. BMPs outlined in the required National Pollutant Discharge Elimination System (NPDES) Permit for Construction Activities would minimize or avoid impacts. Impacts could be further avoided or reduced through use of directional drilling. Transmission lines at the Tuscola Site would cross an additional three surface waters; however, no impacts from construction are anticipated to surface water quality or flow because poles would be sited outside of these resources.

For both the Mattoon and Tuscola sites, hydrostatic test water for pipelines would involve the use of surface water, which may temporarily affect downstream users and aquatic organisms temporarily by lowering stream flow. Such impacts can be minimized by obtaining hydrostatic test water from bodies of water with sufficient flow or volume to supply required test volumes without significantly affecting downstream flow. Both the Jewett and Odessa sites would use groundwater as the hydrostatic test water source.

The 3,000 gallons (11,356 liters) per minute demand for process water can be met for all four proposed sites. The Mattoon and Tuscola sites would primarily use surface water resources. Because the Jewett and Odessa sites would use groundwater resources, direct impacts to surface water resources would not be anticipated. By using surface water as the process water source, the Mattoon and Tuscola sites have the potential to reduce surface flows within the streams and water available to downstream users. For Mattoon, the combined effluent from the Mattoon and Charleston WWTPs (7 million gallons per day [MGD] (27 million liters per day [MLD]) on average) would be sufficient to supply the FutureGen Project demand. However, reduced flow rates in Kickapoo Creek and Cassell Creek would occur. Flow rates in the Kaskaskia River are expected to be adequate even if the current Lyondell-Equistar effluent is diverted to supply the FutureGen Project due to the current water withdrawal and storage practices, which minimize adverse impacts to stream flow and the increasing flow from the upstream discharge of municipal WWTPs. However, the river could be augmented by groundwater sources if low flow occurred.

Normal operation of the FutureGen Power Plant would result in minimal to no adverse impacts from point and non-point effluent sources. ***For all sites there would be a requirement to obtain a Multi-Section General Permit for industrial stormwater control during post-construction operations.*** The FutureGen Power Plant would use a zero liquid discharge (ZLD) system that would eliminate industrial wastewater discharges associated with plant operations. An increase of up to 200 acres (81 hectares) of impervious surface could result in non-point pollution of adjacent surface waters, as well as off-site stream channel erosion during precipitation events. However, during operation, stormwater from parking lots and industrial areas (e.g., coal storage areas) would likely be collected on site through retention ponds and recycled as additional process water for the power plant. The Tuscola, Jewett, and Odessa sites would include underground crossings of surface waters by CO<sub>2</sub> pipelines. In the unlikely event of a CO<sub>2</sub> pipeline leak near one of these crossings, surface water impacts could include a reduction in pH and localized high concentrations of CO<sub>2</sub> and H<sub>2</sub>S. ***The underground pipeline crossings at the Odessa site would only involve ephemeral draws, further reducing the likelihood of impact.***

### 3.1.8 WETLANDS AND FLOODPLAINS

DOE assessed the potential impacts to wetland and floodplain resources based on field verification (wetland delineations) and National Wetland Inventory (NWI) mapping. The Mattoon and Tuscola sites included field verification for the power plant sites and other project components (e.g., utility corridors), allowing for a quantitative analysis using potential acreage (hectares) of impacts. The Jewett and Odessa

sites included field verification for only the power plant sites and relied on NWI mapping for all other project components, allowing for a qualitative assessment limited to wetland type occurring within the project component areas. This assessment was conducted in accordance with 10 CFR 1022 “Compliance with Floodplain and Wetland Environmental Review Requirements.”

All four proposed sites would be subject to the Clean Water Act’s Section 404 (hereafter referred to as Section 404) jurisdiction before wetland permit approval. Variables regarding utility corridors to be used, uncertainties regarding the method of construction for utilities, and Section 404 jurisdictional determination required at each of the proposed sites prevent assessment of specific acreage (hectare) mitigation requirements. The appropriate type and ratio of wetland mitigation would be determined through the Section 404 permitting process.

***Illinois Department of Natural Resources (IDNR) has the authority to regulate wetlands under the Interagency Wetland Policy Act of 1989 (IWPA) for projects that receive funding or technical assistance from the state. The IWPA defines federal money that passes through a state agency as state funding. Isolated, farmed, and U.S. Army Corps of Engineers (USACE) jurisdictional wetlands are state jurisdictional wetlands under the IWPA. IDNR accepts the procedures outlined in the 1987 USACE Wetland Delineation Manual for delineating wetlands. The IWPA requires mitigation for all adverse impacts regardless of the size of the impacted area or the wetland quality.***

Planning and site design standards would be applied at each of the four proposed sites and include the location of injection wells and transmission line poles outside of the 100-year floodplain and wetland areas to avoid direct impacts to these resources. In addition, construction of utilities at all four proposed sites where wetlands are present would result in temporary wetland disturbances such as removal of vegetation, soil erosion and compaction, and sedimentation. Periodic trimming of vegetation and the potential application of herbicides would be required to control plant growth within any utility corridors during operations, resulting in conversion of forested wetlands (impacted during construction of the utility) to herbaceous and shrub wetlands. Operations at any of the proposed power plant sites and sequestration sites would not require additional fill or disturbance to wetlands or floodplains, resulting in no additional impacts to these resources.

None of the proposed power plant sites encroaches on the 100-year floodplain; therefore, no direct impacts are anticipated. The Mattoon and Tuscola Sequestration sites are located outside of the 100-year floodplain; therefore, no direct impacts are anticipated. Areas of the Jewett Sequestration Site are within the 100-year floodplain. Currently, there is no floodplain mapping available for the Odessa Sequestration Site. The proposed utility corridors for all four proposed sites would involve construction within the 100 year floodplain. However, these impacts would be temporary and could include placement of construction equipment and trenching (for underground utilities) within the 100-year floodplain. Operations of these utilities at any of the sites would not affect the floodplain; therefore, no long-term impacts are anticipated. Comparisons of stream crossings and stream impacts for each of the four proposed sites are provided in Sections 3.1.7 and 3.1.9.

The proposed Mattoon Power Plant and Sequestration Site has one jurisdictional, low-quality farm pond (0.05 acre [0.02 hectare]). This pond could be directly impacted through placement of fill during construction, or the pond could be avoided during the site layout and planning process. Up to 29.2 acres (11.8 hectares) of wetlands could be impacted along the transmission line and process water corridors.

The proposed Tuscola Power Plant Site contains no jurisdictional wetlands; therefore, construction would not directly impact wetland resources. During operations of the power plant, the Lyondell-Equistar pond (industrial retention pond) would experience water level fluctuations through process water withdrawals. Overall impacts to the pond would be minimal due to the current industrial use by Equistar for operations. Four wetland areas totaling approximately 5 acres (2 hectares) are located within the

sequestration site. Up to 4.2 acres (1.7 hectares) of wetlands would potentially be impacted along the transmission line and CO<sub>2</sub> corridors.

The proposed Jewett Power Plant Site contains 2 acres (0.8 hectare) of low quality wetlands, 0.1 acre (0.04 hectare) of moderate quality wetlands, and up to 18 acres (7.3 hectares) of low quality ponds, which could be directly impacted through placement of fill during construction. If unavoidable, these impacts would be minimal due to the low value of these resources, which have been previously modified as part of the Jewett Surface Lignite Mine operation. NWI mapping indicates that the sequestration site contains over 43 potential wetlands and the proposed utility corridors contain over 90 potential wetland areas, respectively, which include forested, scrub-shrub, and emergent wetlands associated with streams and several on-channel impoundments (ponds). With the exception of wetlands at the power plant site, all other areas would require a wetland delineation to verify NWI mapping.

The proposed Odessa Power Plant Site contains no jurisdictional wetlands; therefore, construction and operations would not directly impact wetland resources. NWI mapping indicates the sequestration site and the utility corridors contain several surface water features (see Sections 3.1.7 and 3.1.15). With the exception of wetlands at the power plant site, all other areas would require a wetland delineation to verify NWI mapping.

### 3.1.9 BIOLOGICAL RESOURCES

DOE reviewed the biological resource investigations that were conducted for each of the four proposed sites. The investigations included background research to determine the aquatic and terrestrial resources present at the proposed power plant sites, sequestration sites, and utility and transportation corridors. Federal and state agencies were contacted to determine the potential for threatened and endangered species to occur within the proposed construction areas at all four sites (*Appendix A*).

There are no *known* unique or rare aquatic or terrestrial habitats present at any of the alternative sites or corridors (see Sections 4.9, 5.9, 6.9, 7.9, and Appendix A). Therefore, no direct impacts to these resources are expected. The majority of the land proposed for construction at the Mattoon and Tuscola sites is active cropland. Reclaimed mine land and pastureland are the principal lands at the Jewett Site, and ranch land and scrubland are the principal lands at the Odessa Site. The habitats present at each alternative site are prevalent within the respective regions.

Up to 200 acres (81 hectares) of land at the power plant site may be converted to industrial use. With the exception of the Mattoon Site, up to 10 acres (4 hectares) of land at each alternative sequestration site could also be converted to industrial use. Because the Mattoon and Tuscola power plant and sequestration sites have been actively farmed with row crops, the potential for resident wildlife populations at these sites is low (see Sections 4.9 and 5.9). Therefore, impacts related to the displacement of wildlife communities for these sites would be minimal. The Jewett and Odessa sites provide a greater opportunity for wildlife to be present due to the lack of current intrusive human activities (see Sections 6.9 and 7.9). As a result, resident wildlife populations within the areas to be used by the FutureGen Project would be lost or permanently displaced. Displaced wildlife would likely relocate to similar adjacent habitats that are prevalent in the respective regions of the Jewett and Odessa sites.

The proposed Mattoon Power Plant Site contains a small farm pond that may be directly impacted through placement of fill during site construction. Aquatic habitats and species would be lost; however, this impact would be minimal as the pond provides low-value habitat. The Jewett Power Plant Site contains three intermittent tributary streams and three human-made impoundments that could be directly impacted through placement of fill during site construction. Two of these features are disturbed and the third is an ephemeral stream of moderate value. Aquatic habitats and species may be lost through

construction; however, this impact would be minimal as none of these features is known to contain any habitat or species that are not plentiful in this area of Texas (*see Section 6.9*). These features could potentially be avoided during the site layout and planning process. No surface waters exist on either the Tuscola or Odessa Power Plant sites.

Differences among the alternative sites that affect the potential for biological impacts are primarily related to the length of the various utility corridors and the type of environments they traverse. The Mattoon alternative includes up to 35 miles (56.8 kilometers) of utility corridors, most of which are associated with above ground electric transmission lines and below ground process water supply lines. Up to 18.8 miles (30.3 kilometers) of these corridors would require use of a new ROW. The corridors traverse mainly agricultural lands that contain some riparian habitats at the stream crossings. The process water supply line would cross five perennial streams, which may result in temporary and minor impacts to aquatic habitat from trenching and stream flow diversion. However, these impacts could be avoided or minimized through the use of construction methods.

The Tuscola alternative includes up to 31.9 miles (51.3 kilometers) of utility corridors, most of which are associated with above ground electric transmission lines and below ground CO<sub>2</sub> pipelines. Up to 16.9 miles (27.2 kilometers) of these corridors would require use of a new ROW. The below ground utility corridors would only cross intermittent streams. No impacts to aquatic habitats would be expected from construction of the corridors.

The Jewett alternative includes up to 63 miles (101 kilometers) of utility corridors, most of which are associated with the CO<sub>2</sub> pipeline. Up to 13 miles (20.9 kilometers) of these corridors would require use of a new ROW. These corridors traverse mixed oak/grassland and rangeland habitat, some of which is deemed as high-quality deer and turkey hunting ground. Up to 14 perennial and 39 intermittent streams may be crossed by the CO<sub>2</sub> pipelines, and could be temporarily disturbed during construction. Temporary and minor impacts to aquatic habitat from trenching and stream flow diversion may occur. However, these impacts could be avoided or minimized through the use of construction methods.

The Odessa alternative includes up to 128.5 miles (207 kilometers) of utility corridors, most of which are associated with the process water and CO<sub>2</sub> pipelines. This alternative has the greatest potential length of combined new ROW corridor (approximately 68.7 miles (111 kilometers)). This corridor traverses habitats consisting of mesquite lote-bush brush and mesquite juniper brush that are typical of the region. Most of these utilities would be below ground.

There are no known federally- or state-listed rare, threatened, or endangered species on any of the four proposed sites; however, there is the potential for occurrence of listed species. The proposed Mattoon Power Plant and Sequestration Site has potential habitat for the *state-listed* Eastern sand darter and the *federally-listed* Indiana bat. Habitats for the state-listed Kirtland's snake and Eastern sand darter have been found in the vicinity of the process water supply line corridor. The electrical transmission line corridor associated with the proposed Tuscola Power Plant Site has potential habitat for the state-listed Kirtland's snake. The proposed Jewett Power Plant Site has potential habitat for the federally listed Navasota's ladies' tresses, and the sequestration site has potential habitat for the federally-listed Interior least tern, Houston toad, Bachman's sparrow, white-faced ibis, and rare invertebrates. The proposed Odessa Power Plant Site and corridors have potential habitat for the state-listed Texas horned lizard, which occurs within two-thirds of the land area in west Texas.

*If* listed species were *discovered* to occur within construction areas, they could be directly impacted through temporary loss of habitat or through casualties. Surveys would be conducted before ground breaking activities to confirm the presence or absence of species. If species were found in the vicinity of disturbance, consultation would be initiated with respective agencies to develop and implement species

protection plans to avoid impacts. Consultation with the IDNR would be initiated for a site in Illinois. In Texas, consultation would be initiated with the Texas Parks and Wildlife Department. At any site, consultation would be initiated with the U.S. Fish and Wildlife Service (FWS).

Operational impacts on biological resources would be limited to the Mattoon Site attributable to the use of wastewater effluent from the Charleston and Mattoon WWTPs that would reduce flows in Cassell and Kickapoo creeks, respectively. During extreme drought conditions, the 0.6 mile (0.9 kilometer) of Cassell Creek above the confluence with Riley Creek may be dry if discharges from the Charleston WWTP were diverted to the FutureGen facility. Because the Charleston WWTP would be a secondary source, these impacts are not considered likely. Flow would be maintained in Kickapoo Creek even under drought conditions. The diversion of the WWTP effluent from these streams and the associated reduction in flow would have minimal impacts on the state-listed Eastern sand darter that is present several miles downstream.

### 3.1.10 CULTURAL RESOURCES

Initial cultural resource investigations were conducted for each of the four sites under consideration. The investigations included background research designed to identify previously recorded cultural resources in the ROI for each alternative and to determine the potential for additional unrecorded cultural resources in the ROI. At the Mattoon and Tuscola sites, background research was followed by Phase I archaeological surveys within the ROI for all components of the FutureGen Project, including the power plant site, sequestration site, and areas of new utility construction. At the Jewett and Odessa sites, background research was followed by field reconnaissance surveys within the power plant sites. However, field investigations were not conducted at the sequestration sites and areas of new utility construction. Therefore, there is a greater degree of uncertainty for the presence of cultural resources for the Jewett and Odessa sites, particularly for the utility corridors and sequestration sites.

DOE has initiated consultation with Native American Tribes regarding Traditional Cultural Properties (TCPs) that may be present at the alternative sites. No responses from Tribal governments have been received that indicate the presence of TCPs at any of the alternative sites. However, consultation is ongoing (see Appendix A).

No direct or indirect impacts are anticipated at any of the four candidate power plant sites. Principal differences between the sites are related to the uncertainties for the presence of cultural resources along utility corridors and at the sequestration sites. For both the Mattoon and Tuscola alternatives, there are no known cultural resources identified for the utility corridors or the sequestration sites. However, an additional survey may be needed along a segment of the proposed electrical transmission line corridors at both the Mattoon and Tuscola sites. The need for these studies would be determined in consultation with the Illinois Historic Preservation Agency (IHPA).

Because the Jewett and Odessa alternatives have longer utility corridors for pipelines, these alternatives also have a higher potential for encountering both known and unknown cultural resources. This potential is the greatest for Jewett, which contains known cultural sites along various segments of the CO<sub>2</sub> corridor including A-C (3 sites), B-C (15 sites), C-D (13 sites), D-F (1 site), and F-H (3 sites). In addition, 33 recorded archaeological sites were identified within the ROI for the Jewett Sequestration Site. The presence of these features results in the need for additional survey and consultation to determine the status of these cultural sites, the potential for impact to them, and mitigation that may be required if the Jewett Site was selected for the FutureGen Project.

At the Odessa Site, the Texas Historical Commission (THC) has concurred that no additional cultural resource investigations are necessary at the plant site, the CO<sub>2</sub> pipeline corridor east of the proposed

power plant, or the proposed transmission line north of the power plant; however, an archaeological survey would be required for the proposed transmission line corridor south of the power plant, all water pipeline corridors, and for the CO<sub>2</sub> corridors east and west of the sequestration site. A distinguishing feature of the Odessa alternative is the potential for paleontological resources. However, because fossil-bearing rock formations are extensive throughout the region, impacts to unique or irreplaceable paleontological resources are considered low. Consultation with the THC is recommended at the Odessa Site to determine the need for cultural resource investigations associated with any new road construction or improvements to existing roads that may occur.

### 3.1.11 LAND USE

DOE evaluated impacts on land uses with respect to the compatibility of project construction and operations with the current land uses. Impacts were determined based on whether the project would introduce structures and uses that are incompatible with land uses on adjacent and nearby properties; whether the project would introduce structures or operations that require restrictions on current land uses on or adjacent to a proposed site; whether the project would conflict with jurisdictional zoning ordinances; or whether the project would conflict with local or regional land use plans or policies.

None of the sites are considered incompatible with proposed FutureGen Project components. In addition, none of the sites are near a national or state recreation area, incompatible with any local or regional land use plans or zoning classifications, or associated with cleanup under regulations related to voluntary site remediation programs, leaking underground storage tanks, permitted hazardous waste activities, or solid waste landfills. The proposed Mattoon Power Plant Site is in an area planned for industrial development and additional commercial and industrial development is expected over time in this area. The proposed Tuscola Power Plant Site provides a compatible setting because it is near other industrial facilities, and additional unrelated commercial and industrial development would be expected over time. Existing industrial uses occur also in the vicinities of both the Jewett and Odessa Power Plant sites.

With respect to local parks and recreation areas, the proposed Mattoon process water pipeline would have a short-term direct impact on a parallel bike path during construction, which would involve temporary closure or detour. None of the other sites are located near local parks and recreation areas.

For the Mattoon and Tuscola Power Plant sites, there would be a conversion of up to 200 acres (81 hectares) of prime farmland to industrial use (255 Land Evaluation and Site Assessment (LESA) Points at Mattoon and 239 LESA Points at Tuscola). The remaining acreages (244 acres [99 hectares] at the Mattoon Site and 145 acres [59 hectares] at the Tuscola Site) could continue to be used for existing purposes (prime farmland). Construction of the Jewett Power Plant Site would result in the conversion of approximately 200 acres (81 hectares) of range and pasture land (formerly mined and restored; not prime farmland). Also at the Jewett Site, two or three active gas well operations and a storage/maintenance area may be displaced. Construction of the Odessa Power Plant Site would result in the conversion of approximately 200 acres (81 hectares) of range and scrub land and may displace one active oil well and one active gas well.

At the Mattoon Power Plant Site, construction and operations would affect two adjacent residential properties. The Tuscola Power Plant Site construction and operations would affect three adjacent residences. Construction and operations at the Odessa Power Plant Site would affect three nearby residences. There are no residences in the ROI for the Jewett Power Plant Site.

Although stacks at any of the sites must be lighted to meet Federal Aviation Administration (FAA) regulations, Tuscola is the only site that would require FAA notification and evaluation. A 250-foot

(76-meter) stack constructed at nearly any location on the proposed Tuscola Power Plant Site would extend into the controlled airspace around the Tuscola Airport. Construction would require advance FAA notification and evaluation.

At both the Mattoon and Tuscola sites, partial subsurface rights have been optioned at the proposed sequestration site (177 acres [72 hectares] at Mattoon and 289 acres [117 hectares] at Tuscola); however, all applicable subsurface rights would need to be acquired or negotiated before construction. At the Jewett Site, there is a 50-year lease option with a waiver for mineral rights for three injection wells, and for Odessa, the University of Texas controls the land and historically provides subsurface access through easements. For both Jewett and Odessa, title searches would be needed, and all rights would need to be acquired or negotiated before construction.

For the proposed sequestration sites associated with the Tuscola, Jewett, and Odessa sites, up to 10 acres (4 hectares) of land would be converted from current uses. Acreage affected would consist of prime farmland at Tuscola, ranch land or Texas Department of Criminal Justice (TDCJ) property at Jewett, and grazing and oil and gas development land at Odessa. The Mattoon Sequestration Site would be located on the power plant site and no additional acreage would be affected.

Construction and operations associated with utility and transportation corridors would impact land use at all four candidate sites. There would be a temporary loss of existing land uses in corridors during construction. Depending on the depth of underground utilities and the need to retain a cleared ROW, it is likely that most lands within the proposed utility corridors could return to current use after construction. Corridors would be compatible with agricultural and recreational use after construction; however, the corridors would be incompatible with other uses, such as residential development. There would be a minor long-term loss of agricultural production at specific transmission line tower sites and minor long-term impacts due to vegetative maintenance in non-crop segments of any transmission line corridor. Within the proposed utility corridors for both Mattoon and Tuscola, several of the soil types have been identified as prime farmland or would be prime farmland if drained. DOE did not conduct a formal farmland conversion impact rating for these corridors because they are on existing utility ROWs or because they would not result in conversion of significant areas of soils to non-agricultural uses. Because the pipelines would be buried and the electrical transmission lines would be elevated, agricultural use of the land could continue following the construction of any new corridor.

The transmission line corridor requirements for the respective plant sites would result in temporary impacts on land uses as follows:

- The Mattoon transmission line would affect mostly agricultural and recreational land uses along 0.5 to 16 miles (0.8 to 25.7 kilometers) of corridor depending on the option selected.
- The Tuscola transmission line would affect mostly agricultural land use along 0.5 to 17 miles (0.8 to 27.4 kilometers) of corridor depending on the option selected. Under Option 2, 3 miles (4.8 kilometers) of new ROW would be required.
- The Jewett transmission line would affect range land use along up to 2 miles (3.2 kilometers) of corridor.
- The Odessa transmission line would affect mostly scrubland in one of two potential corridors (0.7 to 1.8 miles [1.1 to 2.9 kilometers]).

The pipeline corridor requirements for the respective plant sites would result in temporary impacts on land uses as follows:

- The Mattoon process water pipelines would affect mostly agricultural, recreational, and transportation land uses along *up to* 14.3 miles (23 kilometers) *depending on the* corridor *selected*. The CO<sub>2</sub> pipeline would be constructed within the power plant site boundaries.

- The Tuscola process water pipeline would affect agricultural use and road ROW along 1.5 miles (2.4 kilometers) of corridor. The CO<sub>2</sub> pipeline would be constructed along 11 miles (17.7 kilometers) of existing ROWs.
- The Jewett process water pipeline would affect range land along up to 1 mile (1.6 kilometers) if an on-site well is not used. The CO<sub>2</sub> pipeline would be constructed mainly along cattle ranching and oil and gas production lands for up to 59 miles (95 kilometers).
- The Odessa process water pipeline would affect mainly scrubland along 24 to 54 miles (38.6 to 86.9 kilometers) of corridors depending on the option selected. The CO<sub>2</sub> pipeline would affect land use along 2 to 72 miles (3.2 to 115 kilometers) of corridors, with up to 58 miles (93.3 kilometers) within existing ROW. Intra-well piping would also be required at the sequestration site.

### 3.1.12 AESTHETICS

DOE evaluated impacts to aesthetic resources with respect to the visual compatibility of project features to the surrounding landscape and the potential effect the project would have on those who would be able to see the facilities and its associated components (e.g., transmission lines). Generally, the degree of aesthetic impact depends on surrounding land uses and the distance between the receptor and the proposed project component. The receptors of most concern include residential and public space areas. None of the proposed power plant site alternates are located near national or state recreation areas or federal, state, or local scenic resources.

During construction, trucking and equipment activities would result in temporary impacts to aesthetic resources, such as visual intrusion and increased daytime noise, dust, and traffic, to nearby properties. Other project features that could have temporary aesthetic impacts during construction include the proposed utilities, which would be limited to the corridors, and the construction of the facilities at the sequestration sites. Except for the Mattoon Site, for which the sequestration site would be located at the power plant site, the sequestration sites consist of rural areas with low population densities. Thus, potential visibility of the construction activities at these sites would primarily be limited to travelers on adjacent roads.

During operations, the elements of the proposed FutureGen Power Plant that may cause direct and unavoidable aesthetic impacts would primarily be the tallest structures (stacks would have a maximum height of 250 feet [76 meters]), emission plumes, flare, and security lighting at the facility. During nighttime hours, plant lighting and flare would be visible to surrounding residents and travelers on roadways at a distance of 7 to 8 miles (11.3 to 12.9 kilometers). Direct and unavoidable impacts would be greatest for residential properties nearest the proposed plant site. To minimize these impacts for residences directly adjacent to the proposed power plant site, the final site layout could be configured to place the more intrusive industrial features, such as material handling facilities, away from the residential properties. Additionally, various lighting design schemes could be used to mitigate light pollution. At the proposed sequestration sites, potential visibility of operational activities would be limited to travelers on adjacent roads as the equipment would be relatively short in elevation (maximum height would be 10 feet [3 meters]) and require a relatively small acreage of land disturbance (up to 10 acres [4 hectares]). Once constructed, the degree of visual impacts from the transmission corridors would depend largely on the length of the corridors, the locations of receptors, and whether existing lines would be upgraded or new lines and ROWs would be required.

The landscape surrounding the proposed Mattoon Power Plant and Sequestration Site is primarily farmland with relatively flat topography. Two residential properties directly adjacent to the proposed power plant site, two residences within 0.25 mile (0.4 kilometer), and approximately 20 residences within a 1-mile (1.6-kilometer) radius of the site would have unobstructed views of the facility. Up to 16 miles

(25.7 kilometers) of a new transmission line and ROW may be required; however, this line would mainly traverse croplands and be within 0.25 mile (0.4 kilometer) of a few residential properties.

The landscape surrounding the proposed Tuscola Power Plant Site is similar to that in the Mattoon region; however, there are two industrial facilities that are visible from the proposed site. Three residences directly adjacent to the site and seven residences within 0.5 mile (0.8 kilometer) of the site would have unobstructed views of the power plant. Site features would also be visible to several dozen residences within a 1-mile (1.6-kilometer) distance from the site. Up to 17 miles (27.4 kilometers) of additional lines or taller towers within existing ROWs may be required and would be visible to as many as 150 residential properties within 0.25 mile (0.4 kilometer) of the existing ROW. Up to 3 miles (4.8 kilometers) of a new ROW for the transmission line could be required.

Much of the proposed Jewett Power Plant Site and surrounding environs are situated in a rural area with rolling hills and lands already disturbed by gas wells and mining activities. There are no residential properties near the proposed plant site. Potential visibility of the site would be limited to a nearby mine and the NGR Limestone Generating Station. Because these are industrial facilities, the existing visual characteristics of the area would generally remain unchanged. A new 2-mile (3.2-kilometer) transmission line and ROW for the proposed power plant may be required; however, there are few, if any, residences within the ROI.

Penwell, a historic and largely abandoned oil town with three habitable residences, is located within the ROI of the proposed Odessa Power Plant Site, and remnants of its industrial past are evident throughout the region. Considerable grazing in the region has created a mostly homogenous environment dominated by scrub rangeland interspersed with bare ground. As many as four residential properties along with motorists on Interstate-20 (I-20) would have unobstructed views of the proposed plant site. There are two options for the proposed transmission corridors, one is 0.7 mile (1.1 kilometers) and the second is 1.8 miles (2.9 kilometers) and both would traverse areas devoted to natural gas and oil wells. The southern corridor option would require new lines in an existing ROW that passes through Penwell. The northern corridor option would require new lines and ROWs that would be visible from adjacent county roads.

### **3.1.13 TRANSPORTATION AND TRAFFIC**

DOE reviewed transportation data, including existing vehicular and rail traffic volumes in the regions of the project sites. Vehicular traffic impacts were assessed using standard transportation planning methods that measure levels of service (LOS) to a particular traffic facility. Letter designations are used to assign a LOS that reflect the level of traffic congestion and qualify the operating conditions of a roadway or intersection. The levels range from A to F, with "A" representing the best operating conditions (free flow, little delay) and "F" the worst (congestion, long delays).

Potential impacts to transportation resources would arise during the construction and operation of the FutureGen Project as a result of additional employee vehicles commuting to and from the site, and from trucks and railcars delivering materials. For all of the proposed site alternates, construction- and operations-related traffic at the sequestration sites would be low and would not degrade the LOS of the surrounding county roads. Construction of utility lines would cause temporary and localized congestion, particularly where these lines would cross existing roads and provide access to the construction areas. Additional traffic for the construction of utilities would mainly impact afternoon peak periods; however, because construction of the utilities would be spread out along lengths of corridors, delays to traffic would be minor and temporary.

Construction of the new railroad sidetracks at the Tuscola, Jewett, and Odessa Power Plant sites is expected to have temporary and minor impacts to the existing rail lines at each of these sites. No rail impacts are anticipated during construction at the Mattoon Site. Impacts to the existing CSX rail operations at the Tuscola Site would be minimized through use of the existing switching facilities at the site. At the Jewett and Odessa sites, the impacts to existing rail operations would be minimized by completing construction during hours when the tracks are expected to have the lightest rail traffic.

Proposed operations-related rail traffic would result in less than two additional trains per day for all proposed power plant site alternatives. The following percentage increases to current rail frequencies would occur for the proposed power plant site alternatives:

- In Mattoon, Canadian National main line and Peoria spur would increase by 10 and 71 percent, respectively.
- In Tuscola, CSX rail line would increase up to 36 percent.
- In Jewett, the Burlington Northern Santa Fe line would increase up to 14 percent.
- In Odessa, the Union Pacific line would increase up to 11 percent.

The additional train traffic would cause 6- to 7-minute delays for two at-grade crossings on the Peoria spur (near the proposed Mattoon Site) and for one at-grade crossing on County Road (CR) 750E near the proposed Tuscola Power Plant Site. The at-grade crossing on CR 750E may require actuated gates and warning lights.

Project-related traffic for the proposed Mattoon Power Plant Site would generally be oriented toward the town of Mattoon and the new I-57/County Highway (CH) 18 interchange, and it would mainly impact State Route (SR) 121 and CR 13. During the 44-month construction period, the operation of SR 121 would temporarily degrade from LOS C to D, which represents traffic conditions approaching unstable flow; however, this is typically considered acceptable for construction periods. The operation of CR 13 (between SR 121 and CH 18) would temporarily degrade from LOS A to LOS C, which represents stable flow. Traffic during plant operations is expected to cause CR 13 (between SR 121 and CH 18) to experience a slight change in operations from LOS A to LOS B, which represents reasonably free flow of traffic. Changes to traffic signal timings may be required at the CH 18/I-57 ramp intersections to accommodate changes in the turning volumes during construction and operation of the project. The Illinois Department of Transportation (IDOT) may provide improvements to CH 13 from CH 18 to SR 121, which would cause temporary and localized traffic delays at these improvement sites during construction; however, it is expected that these improvements would be completed before construction activities at the power plant site would begin and would help minimize traffic impacts in the project area.

Construction and operations activities at the proposed Tuscola Power Plant Site would mainly impact CR 1050N and CR 750E. Both of these roadways would degrade from LOS A to LOS C during construction and from LOS A to LOS B during operations. Changes to traffic signal timings may be required at the U.S. 36/I-57 ramp intersections to accommodate changes in turning volumes at those intersections during construction and operation of the project.

Construction and operations activities at the proposed Jewett Power Plant Site would mainly impact Farm-to-Market Road (FM) 39 and State Highway (SH) 164. During construction, FM 39 would degrade from LOS B to LOS D; however, this is typically considered acceptable for construction periods. SH 164 would degrade from LOS B to LOS C. During operations, both of these roadways would degrade from LOS B to LOS C. Changes to traffic signal timings may be required at the U.S. 79/I-45 ramp intersections to accommodate changes in turning volumes at those intersections.

Construction and operations activities at the proposed Odessa Power Plant Site would mainly impact FM 1601. This roadway would degrade from LOS A to LOS D during construction and from A to B

during operations. Traffic signals may be required at two key intersections on FM 1601 to accommodate changes in the turning volumes. Access to the power plant site via FM 1601 would need to be improved before initiating project construction and would require construction of a new underpass at the Union Pacific rail line near the site. The construction of this grade-separated crossing would result in temporary localized traffic delays; however, the additional traffic volume for this project component was included in the traffic analysis conducted for the proposed power plant site.

### 3.1.14 NOISE AND VIBRATION

DOE assessed the potential for noise and vibration impacts from construction and operation of the proposed FutureGen Project. Impacts were determined based on whether the project would conflict with a jurisdictional noise ordinance; permanently increase the ambient noise levels for receptors in the ROI during operations; temporarily increase the ambient noise levels for receptors in the ROI during construction; cause an airblast noise level in excess of 133 decibels (dB); cause a blasting peak particle velocity greater than 0.5 inch/second (12.7 millimeters/second) at off-site structures; or exceed the Federal Transit Administration's (FTA's) distance screening and human annoyance thresholds for ground-borne vibrations of 200 feet (61 meters) and 80 vibration decibels (VdB).

The impact assessment evaluated noise and vibrations generated by stationary (e.g., fixed location) sources such as construction-related and power plant operating equipment, and mobile (e.g., moving) sources such as construction-related vehicle trips and operational deliveries by rail, car, and truck. For the purposes of this analysis, all construction activities within the boundaries of the proposed project sites were considered an area-wide stationary noise source. To be conservative, noise from construction was assumed to originate at the closest site boundary to each noise receptor. Steady-state, operational noise from the power plant was assumed to occur at the center of property. DOE also evaluated noise from plant startup, unplanned restarts due to system shutdown, and equipment units installed outside of the proposed power plant's building envelope. The additional traffic generated on the rail and road transportation corridors during both the construction and operational phases of the proposed project was evaluated as part of the mobile source *noise* impact assessment.

DOE considered the following generally accepted relationships (*MTA, 2004*) in evaluating human response to relative changes in noise level:

- A 2- to 3-A-weighted sound measurements (dBA) change from ambient conditions is the threshold of change detectable by the human ear;
- A 5-dBA change is readily noticeable; and
- A 10-dBA change is perceived as a doubling or halving of the noise level.

Based on these relationships, DOE adopted a 3-dBA increase in the ambient noise level at sensitive receptors located adjacent to the project boundary as a threshold indicating that *the potential impacts would be significant*. Further detailed noise analysis *was conducted to evaluate the impacts at mobile source receptors whenever the 3-dBA threshold was exceeded using the Federal Highway Administration's (FHWA) Traffic Noise Model (TNM), Version 2.5 modeling software*. If below the 3-dBA threshold, DOE concluded that the anticipated increase in noise levels resulting from project-related activities would not be noticeable and would require no further analysis. Residences and any schools, hospitals, nursing homes, houses of worship, and parks within the 1-mile (1.6-kilometer) ROI were considered sensitive receptors in this analysis.

During construction of the proposed power plant, noise impacts for the respective plant sites would be as follows:

- For the Mattoon Site, noise levels would increase by as much as 41 and 37 dBA at the two closest residences (30 feet [9.1 meters] from the site boundary). An increase above the 3-dBA threshold would occur within about **2.4 miles (3.9 kilometers)** of the site boundary, which includes Riddle Elementary School and several dozen residences on the western side of Mattoon.

- For the Tuscola Site, noise levels would increase by as much as 45.7 dBA at the three closest residences (adjacent to the site boundary). An increase above the 3-dBA threshold would occur within about 1.5 miles (2.4 kilometers) of the site boundary, encompassing much of downtown Tuscola.
- For the Jewett Site, noise levels would increase by as much as **15** dBA at Wilson Chapel (0.25 mile [0.4 kilometer] from the site boundary). No other sensitive receptors are within the radius of the 3-dBA threshold.
- For the Odessa Site, noise levels would increase by as much as **6** dBA at the **two** closest residences (0.25 mile [0.4 kilometer] from the site boundary). No sensitive receptors are within the radius of the 3-dBA threshold.

No vibration impacts to sensitive receptors near any of the alternative plant sites are anticipated during construction.

During power plant startups and unplanned restarts, noise impacts for the respective plant sites would be as follows:

- Noise levels for the Mattoon Site would increase by as much as 21 dBA at the two closest residences and by as much as 13 dBA at three other residences within approximately 1 mile (1.6 kilometers) of the site boundary.
- Noise levels for the Tuscola Site would increase by as much as 25 dBA at the three closest residences and by as much as 15 dBA at four other residences within approximately 1 mile (1.6 kilometers) of the site boundary.
- Noise levels for the Jewett Site would increase by up to **17** dBA at Wilson Chapel (not used for regular services). No other sensitive receptors are within the radius of the 3-dBA threshold.
- **Noise levels for the Odessa Site would increase by up to 4.1 dBA at the two closest residences. No other sensitive receptors are within the radius of the 3-dBA threshold.**

During power plant operations, noise impacts for the respective plant sites would be as follows:

- For the Mattoon Site, noise levels would increase by as much as 6 to 9 dBA at the two closest residences. An increase above the 3-dBA threshold may occur within a radius of 1.5 miles (2.4 kilometers) of the center of the site, which includes about a dozen residences.
- For the Tuscola Site, noise levels would increase by as much as 12 dBA at the three closest residences. An increase above the 3-dBA threshold may occur within a radius of 1 mile (1.6 kilometers) of the center of the site, which includes **about seven** residences.
- For the Jewett Site, noise levels would increase by **as much as 6 dBA** at Wilson Chapel. **No other sensitive receptors are within the radius of the 3-dBA threshold.**
- At the Odessa Site, no sensitive receptors are within the radius of the 3-dBA threshold.

Potential noise and vibration impacts from train operations at the respective plant sites would be as follows:

- Noise levels for the Mattoon Site during coal unloading would increase by as much as 17 dBA at the two closest residences and less than 3 dBA at three other residences within approximately 1 mile (1.6 kilometers) of the site boundary. Potential vibration impacts would occur for one residence within the FTA threshold of 200 feet (61 meters) from the rail loop, which would require additional analysis.
- Noise levels for the Tuscola Site during coal unloading would increase by less than 3 dBA at the **seven** closest residential receptors and within approximately 1 mile (1.6 kilometers) of the site boundary. No sensitive receptors are located within the FTA threshold for rail vibration impacts.

- Noise levels for the Jewett Site during coal unloading would increase by less than 3 dBA at Wilson Chapel (not used for regular services). No other sensitive receptors are within the radius of the 3-dBA threshold. No sensitive receptors are located within the FTA threshold for rail vibration impacts.
- No sensitive receptors at the Odessa Site are within the radius of the 3-dBA threshold for noise impacts from coal unloading. No sensitive receptors are located within the FTA threshold for rail vibration impacts.

For all sequestration sites, the increases in noise levels during construction and operation would be below the 3-dBA threshold at the closest sensitive receptors. Nearby sensitive receptors may experience temporary ground-borne noise during borehole micro-seismic testing and surface seismic surveys at the selected site.

For utility corridors associated with all candidate FutureGen Project sites, temporary increases in noise levels impacting adjacent receptors may occur during periods of construction. During utility operations, no increases in noise levels would be anticipated.

Analysis did not include intermittent noise and vibrations generated by rail car shakers to loosen coal material from the walls of rail cars during unloading. Typically, the shakers are mounted on an assembly and are used intermittently for a 10-second period. Pneumatic or electrical rail car shakers could generate noise levels up to 118 dBA. If the shaker is used on every rail car, the shaker would be used an estimated 253 to 428 times per week. Design of coal handling equipment would be evaluated during the final design process.

Potential noise impacts from construction traffic at the respective plant sites would be as follows:

- For the Mattoon Site, noise levels would increase by as much as 8 dBA on CH 13 south of CH 18, by 5 dBA on CH 18 east of CH 13, and by 2 dBA on SR 121 near the site.
- For the Tuscola Site, noise levels would increase by up to 14.1 dBA on CR 750E north of U.S. 36, up to 7.2 dBA on CR 1050N west of U.S. 45, and less than 3 dBA on U.S. 36 east of CR 750E.
- For the Jewett Site, there are no residences along local access route FM 39; no impacts to sensitive receptors are anticipated.
- For the Odessa Site, noise levels would increase by up to 6 dBA at one residence on *Avenue J*, near FM 1601 north of I-20 and by less than 3 dBA near I-20.

Potential noise impacts from operational traffic at the respective plant sites would be as follows:

- For the Mattoon Site, noise levels would increase by up to 4 dBA on CH 13 south of CH 18, less than 2 dBA on CH 18 east of CH 13, and less than 1 dBA on SR 121 near the site.
- For the Tuscola Site, noise levels would increase by as much as 9.4 dBA on CR 750E north of U.S. 36, up to 4.1 dBA on CR 1050N west of U.S. 45, and less than 3 dBA on U.S. 36 east of CR 750E.
- For the Jewett Site, there are no residences along local access route FM 39; no impacts to sensitive receptors are anticipated.
- For the Odessa Site, noise levels would increase *less than* 3 dBA at one residence on *Avenue J*, near FM 1601 north of I-20 and less than 1 dBA near I-20.

DOE anticipates that coal rail deliveries for the proposed FutureGen Power Plant would require five trains per week on existing rail alignments.

Noise impacts along rail alignments associated with coal delivery and other train requirements during FutureGen Project operations at the respective plant sites would be as follows:

- At the Mattoon Site, the frequency of occurrence of noise at current levels from passing trains would increase by 71 percent on the Peoria spur and 10 percent on the Canadian National main line.
- At the Tuscola Site, the frequency of occurrence of noise at current levels from passing trains on the CSX rail line would increase by 24 to 36 percent.
- At the Jewett Site, the frequency of occurrence of noise at current levels from passing trains on the Burlington Northern Santa Fe rail line would increase by 14 percent.
- At the Odessa Site, the frequency of occurrence of noise at current levels from passing trains on the Union Pacific rail line would increase by 11 percent.

### 3.1.15 UTILITY SYSTEMS

DOE evaluated the impacts of construction and operation of the proposed FutureGen Project on existing utilities. Impacts were determined based on whether the project would affect the capacity of public water or wastewater utilities, require extension of water or sewer mains involving off-site construction, provide sufficient water capacity for fire suppression, and affect the capacity and distribution of local and regional energy or fuel suppliers.

The effect on the regional electric systems cannot be finalized until detailed studies are completed by the Midwest Independent System Operator (MISO) transmission systems for the Illinois sites (Mattoon and Tuscola) and Electric Reliability Council of Texas (ERCOT) for the Texas sites (Jewett and Odessa). Preliminary indications are that the capacity of potential transmission line interconnections would be sufficient for the project at either Illinois site. The MISO feasibility study will determine ultimate line requirements, and whether the project would be subject to curtailment under certain conditions (i.e., project output could be reduced or put offline). For both the Jewett and Odessa sites, the ERCOT studies indicate that transmission system upgrades would be needed to handle project output. These upgrades would be required before operation in 2012 or the project could be subject to curtailment.

DOE concluded that sufficient process water capacity is available to meet the demands of the FutureGen Project at any of the four alternative sites as follows:

- At the Mattoon Site, combined effluents from the Mattoon and Charleston WWTPs would provide the source of process water. These combined effluents average 7.1 MGD (26.9 MLD), which is sufficient to meet the project demands in most years. During periods of low effluent discharge, process water would be supplemented by withdrawals from an on-site reservoir, which would be refilled during periods of higher effluent discharge.
- At the Tuscola Site, process water would be obtained from the Lyondell-Equistar Chemical Company's 150-million gallon (568-million liter) holding pond, which is maintained via withdrawals from the Kaskaskia River. DOE determined that this source would be sufficient to meet the project needs.
- At the Jewett Site, a groundwater resource assessment indicates that a sustained pumping rate of 3,000 gallons (11,356 liters) per minute is attainable from the Carrizo-Wilcox Aquifer, which would meet the project demand.
- At the Odessa Site, DOE determined that sufficient groundwater is available from the High Plains, Dockum, Capitan Reef, or Pecos Valley aquifers, any of which could individually meet the project demand.

No process water discharges would occur at any alternative site because the power plant would include a ZLD system, whereby all used process water would be recycled within the plant.

All sites are located near high-volume natural gas pipelines that have sufficient capacity to meet the maximum project demand of 1.8 million cubic feet (0.05 million cubic meters) per hour.

The relatively small demand for potable water (6,000 gallons per day [22,712 liters per day]) can be met at any of the proposed sites through existing or new sources. Both sites in Illinois would likely be served by municipal water systems that have adequate capacities to support the demand; both sites in Texas would be served by newly installed groundwater wells. Also, the relatively small demand for sanitary wastewater treatment can be met at any of the proposed sites through existing wastewater treatment systems or by construction of new on-site systems. Both sites in Illinois would be served by existing WWTPs that have adequate capacity to serve the project; both sites in Texas would require the construction of on-site sanitary wastewater facilities.

Utility needs for sequestration sites would be limited to the provision of an electric service line to operate pumps and other equipment. These needs could be met for all potential project sites.

The transmission line requirements for the respective plant sites would be as follows:

- The Mattoon transmission line would be 0.5 to 16 miles (0.8 to 25.7 kilometers) in length, depending on the option selected.
- The Tuscola transmission line would traverse 0.5 to 17 miles (0.8 to 27.4 kilometers), depending on the option selected.
- The Jewett transmission line would be 2 miles (3.2 kilometers) in length.
- The Odessa transmission line would be 0.7 to 1.8 miles (1.1 to 2.9 kilometers) in length, depending on the option selected.

The pipeline requirements for the respective plant sites would be as follows:

- The Mattoon process water pipelines would traverse up to 14.3 miles (23 kilometers). The CO<sub>2</sub> pipeline would be constructed within the power plant site boundaries.
- The Tuscola process water pipeline would be 1.5 miles (2.4 kilometers) in length. The CO<sub>2</sub> pipeline would be constructed mainly along 11 miles (17.7 kilometers) of existing ROWs.
- The Jewett process water pipeline would traverse approximately 1 mile (1.6 kilometers) if an on-site well is not used. The CO<sub>2</sub> pipeline would be 52 to 59 miles (83.7 to 95.0 kilometers) long, depending on the option selected.
- The Odessa process water pipeline would be 24 to 54 miles (38.6 to 86.9 kilometers) long, depending on the option selected. If existing commercial CO<sub>2</sub> pipelines are used, new connections would traverse 2 to 14 miles (3.2 to 22.5 kilometers).

### **3.1.16 MATERIALS AND WASTE MANAGEMENT**

DOE evaluated the impacts of construction and operation of the proposed FutureGen Project on existing regional suppliers for materials and waste disposal. Impacts were determined based on whether the project would: cause new sources of construction materials and operational supplies to be built; affect the capacity of existing material suppliers and industries in the region; create waste for which there are no commercially available disposal or treatment technologies; create hazardous waste in quantities that would require a treatment, storage, or disposal permit; affect the capacity of hazardous waste collection services and landfills; and create reasonably foreseeable conditions that would increase the risk of a hazardous material or waste release.

DOE concluded that well-established suppliers are available with sufficient capacities to meet the demands for construction of the FutureGen Project at any of the four alternative sites as follows:

- At the Mattoon Site, suppliers have the capacity to produce concrete at 500 cubic yards (382 cubic meters) per hour, asphalt at 750 tons (680 metric tons) per hour, and aggregate at 900,000 tons (816,466 metric tons) per year. Construction of a process water reservoir would increase fill and spoils handling requirements.
- At the Tuscola Site, suppliers have the capacity to produce concrete at 330 cubic yards (252 cubic meters) per hour, asphalt at 1,900 tons (1,724 metric tons) per hour, and aggregate at 4.4 million tons (4 MMT) per year.
- At the Jewett Site, suppliers have the capacity to produce concrete at 550 cubic yards (420 cubic meters) per hour and asphalt at 8,000 tons (7,257 metric tons) per day. Multiple suppliers are available for aggregate material, although production rates were not available.
- At the Odessa Site, suppliers have the capacity to produce concrete at greater than 230 cubic yards (176 cubic meters) per hour and asphalt at greater than 2,500 tons (2,268 metric tons) per day. Multiple suppliers are available for aggregate material, although production rates were not available.

DOE concluded that solid waste landfills are available with sufficient capacity to meet the demands for construction waste from the FutureGen Project at any of the four alternative sites. Both Mattoon and Tuscola have regional landfill capacity of up to 116 years at current disposal rates. Also, Mattoon and Tuscola have available space for on-site landfills if needed. Jewett has regional landfill capacity of up to 132 years at current disposal rates, as well as available space for an on-site landfill if needed. Odessa has regional landfill capacity of up to 177 years at current disposal rates, as well as available space for an on-site landfill if needed. Given the sanitary and hazardous waste disposal capacities available in the region, the impact of disposal of generated waste would be minimal.

Small amounts of hazardous waste would be generated during construction of the FutureGen Project; therefore, DOE concluded that a Resource Conservation and Recovery Act (RCRA) permit would not be required at any of the candidate sites. Five hazardous waste landfills are located within approximately 100 to 400 miles (161 to 644 kilometers) of both the Mattoon and Tuscola sites. The closest hazardous waste landfill to either site has more than 14 million cubic yards (10 million cubic meters) of available disposal capacity. The Jewett Site is within 300 miles (483 kilometers) of two hazardous waste landfills, of which the closest has 2.7 million cubic yards (2 million cubic meters) of available disposal capacity. The Odessa Site is approximately 60 miles (96.6 kilometers) from a hazardous waste landfill that has more than 5 million cubic yards (3.8 million cubic meters) of available disposal capacity.

Coal is the principal material required for operation of the FutureGen Power Plant and is an abundant resource in the U.S., including sub-bituminous Powder River Basin (PRB) coal from Wyoming and bituminous coal from Illinois, Indiana, Kentucky, and other states. The demand for coal at either the Mattoon or Tuscola site in Illinois would represent 3.5 percent of current coal consumption by electric utilities within the state. At either the Jewett or Odessa site in Texas, the plant demand would represent 1.9 percent of current coal consumption by electric utilities within the state. Other common chemicals and materials required for operations are readily available. Also, markets exist for the sulfur, bottom slag, and ash byproducts from plant operations.

Solid waste and hazardous waste generated by the plant during operations would be disposed of at landfills used for construction waste. The regional sanitary and hazardous waste landfills available at each of the four candidate plant sites have sufficient capacity to meet the demands of the FutureGen Project.

Comparable risks from onsite chemical storage requirements would occur at any of the four alternative plant sites. Precautions would be taken to prevent and mitigate the impacts of releases of

hazardous materials and waste during construction and routine operations, and personnel would be trained and equipped to respond to spills when they occur.

Relatively small amounts of materials would be consumed and small amounts of waste would be generated during construction and operation or maintenance of facilities required for sequestration, utility corridors, and transportation systems. Local and national suppliers have adequate capacity to meet FutureGen Project demands for materials and waste disposal requirements at any of the four candidate sites.

### 3.1.17 HUMAN HEALTH, SAFETY, AND ACCIDENTS

DOE evaluated the potential effects of the proposed power plant and sequestration activities on human health and safety, as well as the potential for accidents. The potential for occupational or public health impacts was based on criteria, including occupational health risk due to accidents, injuries, or illnesses during construction and operating conditions; health risks (hazard quotient or cancer risk) due to air emissions from the proposed power plant under routine operating conditions; health risks due to unintentional releases associated with carbon sequestration activities; and health risks due to terrorist attack or sabotage at the power plant or carbon sequestration site.

The occupational health and safety assessment evaluated exposures of hazardous chemicals that could result from routine operations. Potential occupational safety impacts were estimated based on national workplace injury incidence and fatality rates obtained from the U.S. Bureau of Labor Statistics (USBLS) for similar industry sectors. From these data, the projected numbers of total recordable cases, lost workday cases, and fatalities were calculated as stated below.

Assuming an average workforce of 350 employees during construction of the FutureGen Project at any of the four candidate sites, the following annual accident rates would be anticipated:

- Total recordable cases = 20
- Lost workday cases = 11
- Fatalities = <1 (0.1)

Assuming a peak workforce of 700 employees during construction of the FutureGen Project at any of the four candidate sites, the following annual accident rates would be anticipated:

- Total recordable cases = 39
- Lost workday cases = 22
- Fatalities = <1 (0.2)

Based on an expected workforce of 200 during operation of the FutureGen Project at any of the four candidate sites, the following annual accident rates would be anticipated:

- Total recordable cases = 2
- Lost workdays cases = 1
- Fatalities = <1 (0.002)

DOE evaluated air quality impacts on human health related to HAPs potentially released during routine operation of the FutureGen power plant site and sequestration site. The assessment of potential toxic air pollutant emissions demonstrated that all health impacts for HAPs would be below the relevant EPA-recommended exposure criteria for total cancer risk (reference of  $1 \times 10^{-6}$ ) and total hazard quotient (non-cancer hazard index of 1) at which levels no health risks are expected to occur. The total cancer risk and hazard quotient values for the FutureGen Project would be below the EPA-recommended criteria at all four candidate sites. The respective values for each site would be:

- Mattoon – total cancer risk =  $0.084 \times 10^{-6}$ ; total hazard quotient = 0.0007
- Tuscola – total cancer risk =  $0.022 \times 10^{-6}$ ; total hazard quotient = 0.0002
- Jewett – total cancer risk =  $0.222 \times 10^{-6}$ ; total hazard quotient = 0.0017
- Odessa – total cancer risk =  $0.114 \times 10^{-6}$ ; total hazard quotient = 0.0009

DOE evaluated potential accidents associated with carbon sequestration activities and their potential health effects on workers and the general public who may be exposed to the release of gases (CO<sub>2</sub> and H<sub>2</sub>S) (Tetra Tech, 2007). The expected incidence of pipeline ruptures or punctures was evaluated using existing CO<sub>2</sub> pipeline data. The estimated failure rate of wellhead equipment during operation was based on natural gas injection-well experience. Failure frequencies for leakage scenarios were obtained from estimates of releases from existing injection sites and natural releases. The potential for accidents considered in this analysis were expressed on a per annum basis: likely (frequency  $\geq 1 \times 10^{-2}$ /yr); unlikely (frequency from  $1 \times 10^{-2}$ /yr to  $1 \times 10^{-4}$ /yr), and extremely unlikely (frequency from  $1 \times 10^{-4}$ /yr to  $1 \times 10^{-6}$ /yr). The following accidents were analyzed:

- Ruptures in the pipeline transporting CO<sub>2</sub> and H<sub>2</sub>S from the plant to the sequestration site (considered unlikely);
- Punctures in the CO<sub>2</sub> pipeline (considered unlikely to likely depending on the site);
- Wellhead failures at the injection well (considered extremely unlikely);
- Slow upward leakage of CO<sub>2</sub> from the injection well (considered extremely unlikely); and
- Slow upward leakage of CO<sub>2</sub> from other existing wells (considered extremely unlikely to unlikely).

Harm caused by released gases from these types of accidents generally decreases with distance from the point of release because of mixing with air and dilution of the gases. Thus, downwind from the release point there are potential impact zones where different levels of exposure can occur and where different effects on human health can occur. When DOE calculated the number of individuals that could be affected by a particular level of exposure, those exposed to all the higher levels were counted along with those exposed to the level of interest.

DOE categorized potential impacts on humans from unintentional releases of sequestration gases as “adverse,” “irreversible adverse,” and “life threatening” as defined below:

- **Adverse Effects:** Includes all effects ranging from mild and transient effects, such as headache or sweating at lower chemical concentrations, up to but not including Irreversible (permanent) Adverse Effects. The number of individuals affected includes the people who would suffer Irreversible Adverse Effects (described below) and those who would suffer Life Threatening Effects.
- **Irreversible Adverse Effects:** Generally occurring at higher concentrations, irreversible (permanent) adverse effects may include death, impaired organ function (such as central nervous system damage) and other effects that impair everyday functions. However, the number of people included in this group includes people who suffer Life Threatening Effects (described below).
- **Life Threatening Effects:** Includes the most harmful effects occurring at exposures to the highest concentrations of chemicals and having the capability to cause death.

Impacts of CO<sub>2</sub> and H<sub>2</sub>S gas releases on workers and the public depend on the location of the releases, the equipment involved, the meteorological conditions (including atmospheric stability and wind speed and direction), the direction of any release from a puncture (e.g., upwards or sideways), and other factors that would depend on the specifics of the accident.

Simulation models were used to estimate the emission of CO<sub>2</sub> for the aboveground release scenarios when the gas is in a supercritical state. The model simulations were conducted for the case with CO<sub>2</sub> at 95 percent and H<sub>2</sub>S at 100 parts per million by volume (ppmv). The state of the contained captured gas prior to release is important with respect to temperature, pressure, and the presence of other constituents. Release of CO<sub>2</sub> under pressure would likely cause rapid expansion and then reduction in temperature and pressure, which can result in formation of solid-phase CO<sub>2</sub> (Tetra Tech, 2007). The estimated quantity of solid-phase formed was 26 percent of the volume released; therefore 74 percent of the volume released from a pipeline rupture or puncture was used as input to the simulation model for computing atmospheric releases of CO<sub>2</sub> and H<sub>2</sub>S. Carbon dioxide is heavier than air and subsequent atmospheric transport and dispersion can be substantially affected by the temperature and density state of the initially released CO<sub>2</sub>. The meteorological conditions at the time of the release would also affect the behavior and potential hazard of such a release.

The potential effects of CO<sub>2</sub> and H<sub>2</sub>S releases from pipeline ruptures and punctures were evaluated using an automated "pipeline-walk" analysis. The methodology (described in Appendix D and in greater detail in the risk assessment) estimates the maximum expected number of individuals from the general public potentially affected by pipeline ruptures or punctures at every 300 meters along the proposed pipelines for each site. The analysis takes into account the effects of site-specific variable meteorological conditions and the location of pipeline ruptures or punctures. For wellhead ruptures, the potential impact zones corresponding to health-effects criterion values for H<sub>2</sub>S and CO<sub>2</sub> were determined using the same model and assuming meteorological conditions that resulted in the highest potential chemical exposures. The number of individuals potentially affected within the identified impact zone was determined from population data obtained from the 2000 U.S. Census.

While CO<sub>2</sub> released in a pipeline accident could harm or asphyxiate people, the H<sub>2</sub>S presents greater risks of toxic effects. The consequences of a pipeline accident are greatest at the Jewett Site. The model simulations predicted the potential for a pipeline rupture to result in life threatening effects for one person. The model also predicted the occurrence of a pipeline rupture to cause irreversible adverse effects to one individual at the Jewett Site. Among the four candidate sites, Odessa and Mattoon would have the lowest potential for adverse impacts from gas releases, with no potential for irreversible adverse or life threatening effects from a rupture or puncture.

Nonpermanent adverse effects are a concern and could possibly reach many more people. If a pipeline rupture occurs, the Tuscola and Jewett sites would have the potential for greatest number of people experiencing nonpermanent adverse effects. Depending on where or under what conditions the release occurred, DOE's analysis indicates that seven and 52 persons, respectively, at the above two sites could potentially experience nonpermanent adverse effects from H<sub>2</sub>S exposure attributable to a pipeline rupture. Tuscola could have the potential for one person to experience nonpermanent adverse effects from H<sub>2</sub>S exposure attributable to an upper-bound consequence for a pipeline puncture. Jewett could have a maximum of 6 persons experience adverse effects from H<sub>2</sub>S if a pipeline puncture occurred.

The FutureGen Power Plant would be equipped to remove most H<sub>2</sub>S that is captured with CO<sub>2</sub> and to recover the sulfur. However, future power plants may more efficiently convert coal to electricity while capturing and sequestering CO<sub>2</sub> if they do not remove most of the H<sub>2</sub>S from the captured gases. To further investigate this possibility, DOE and the Alliance are considering whether to perform short-duration tests of sequestration of the CO<sub>2</sub> without first removing most of the H<sub>2</sub>S. These co-sequestration tests would involve pipeline transport and sequestration of CO<sub>2</sub> mixed with about two percent H<sub>2</sub>S (20,000 ppmv) or 200 times greater than the base case, which assumed the H<sub>2</sub>S concentration would be 100 ppmv. There could be two tests that would have durations of approximately one week each. ***Because these tests would occur for a very short period of time (a total of two weeks), it would be very unlikely that an accidental release would occur during co-sequestration testing. Nevertheless,***

*additional model simulations of pipeline ruptures or punctures to represent releases during the co-sequestration experiment were conducted, as discussed in Section 4.5.5 of the Final Risk Assessment Report. These results show that the distance downwind where the public could be exposed to H<sub>2</sub>S at levels that could result in adverse effects are significantly greater than for the base case, and thus more people could be exposed, if a release occurred during an experiment. While the distances where adverse effects occur, as listed in the Risk Assessment, are quite high (tens of miles), they are likely greatly overestimated in the model, as it assumes that the wind would be maintained at the same stability class, wind speed and direction over a substantial amount of time (e.g., 19 hours for Jewett). Although short-term testing of co-sequestration (CO<sub>2</sub> with H<sub>2</sub>S) may be considered for two weeks during the DOE-sponsored phase of the proposed project, no decision has been made yet to pursue the co-sequestration testing, and further NEPA review may be required before such tests could be conducted. If co-sequestration would be considered for a longer period of time under DOE funding, further NEPA review would be required. To minimize the potential for releases during the co-sequestration experiments, additional protective measures could be implemented, including inspection of the pipeline before and after the tests and not allowing any excavation along the pipeline route during the tests.*

Given the initially estimated risks for each site, DOE and the Alliance would undertake design modifications to reduce the risks as much as practicable. Following selection of a host site, the Alliance would undertake more detailed site characterization work and site-specific design work, including design modifications that would reduce the risks. DOE would then re-examine the potential risks as part of a Supplement Analysis or a Supplemental EIS before proceeding with funding for construction.

The risk of a wellhead failure during sequestration activities is considered extremely unlikely. Consequences associated with a H<sub>2</sub>S release during a wellhead failure would have the highest potential for adverse effects at Jewett (as many as four persons) or Tuscola (one person) from H<sub>2</sub>S exposure. Irreversible or life threatening effects would likely involve no more than one person. A wellhead failure at either Odessa or Mattoon would likely affect no more than one person.

Releases from upward leakage of H<sub>2</sub>S in the injection well or other existing deep wells within the sequestered-gas plume radius are considered extremely unlikely. Among the four candidate sites, Jewett and Tuscola would have the potential for the highest numbers of persons experiencing adverse effects in the event of such an incident (0.4 to more than 26 at Jewett and 6 persons at Tuscola). Adverse effects from such an incident at Mattoon (one person) and Odessa (0.3 person) would be lower.

DOE considered potential health and safety impacts from accidents at the FutureGen Power Plant. The analyses assumed the upper-bound situation in which no design changes or extra engineering controls are used to reduce risks. In the case of a Claus unit failure caused by a plant explosion, Mattoon would potentially have the highest irreversible adverse effects on individuals (19 and 143, respectively) from SO<sub>2</sub> and H<sub>2</sub>S exposure. Claus unit failure at Tuscola could potentially cause irreversible adverse effects on 15 and 115 individuals, respectively, from SO<sub>2</sub> and H<sub>2</sub>S exposure. At Jewett, SO<sub>2</sub> and H<sub>2</sub>S releases could cause irreversible adverse effects on 12 and 92 individuals, respectively. Odessa would potentially have the lowest irreversible adverse effects on individuals from exposure to SO<sub>2</sub> (12) and H<sub>2</sub>S (2).

Potential life threatening effects from SO<sub>2</sub> exposure due to a Claus unit failure would range from a high of 10 individuals at Mattoon to one individual at Odessa. H<sub>2</sub>S releases due to a Claus unit failure would potentially have life-threatening effects ranging from a high of four individuals at Mattoon to zero individuals at Odessa. The Riddle Elementary School in Mattoon would be located outside of the area where irreversible effects from SO<sub>2</sub> could occur if the Claus unit were not located near the southeast boundary of the Mattoon Power Plant Site. However, the Alliance would not select the Mattoon Site unless they can ensure that the placement of the proposed power plant and appropriate design and mitigation measures avoid any potential for serious effects at the school. If sulfuric acid can be produced

and sold, the need to produce *elemental* sulfur and, and therefore, the need for the Claus unit and the risks associated with it would be eliminated.

The potential for spills of chemicals associated with the power plant would be the same regardless of the site because the operation of the power plant would be the same at each location. However, the potential effects of a large spill could differ depending on the proximity of residences and facilities to the site. Three scenarios were evaluated to estimate the potential for effects from ammonia releases: a leak from a tank valve, a tanker truck spill, and a tank rupture. Both workers and the general public could be affected by a release due to the two large spills from a tanker truck spill and a tank rupture. The distances where effects could occur differ between the sites due to differences in maximum air temperature. The furthest distance was for a tanker truck spill, since the ammonia spill could be outside of the containment dike.

The estimated distances within which adverse effects could occur from the tanker truck release are:

- Mattoon - 14,763 feet (4,500 meters);
- Tuscola - 14,107 feet (4,300 meters);
- Jewett - 15,092 feet (4,600 meters); and
- Odessa - 15,584 feet (4,750 meters).

At two of the sites, Mattoon and Tuscola, there are residences within the estimated distances from the proposed power plant site where adverse effects on the general populace could occur. At Jewett, workers at the nearby mine and existing generating station could possibly be affected.

As with any U.S. energy infrastructure, the FutureGen Project could potentially be the target of terrorist attacks or sabotage. DOE evaluated the potential impacts from a sabotage or terrorism event by examining the results of the accident analyses of major and minor system failures or accidents at the proposed plant site and gas releases along the CO<sub>2</sub> pipeline(s) and at injection wells. The accident analyses evaluate the outcome of catastrophic events without determining the motivation behind the incident. The accident analyses evaluated potential releases from pipelines, wellheads, and major and minor system failures/accidents at the proposed power plant site and these accidents, as described above, could also be representative of the impacts from a sabotage or terrorism event.

### 3.1.18 COMMUNITY SERVICES

Effects on community services were assessed with respect to law enforcement, fire protection, emergency response, health care services, and the local school system. Evaluations were made based on whether these services would be affected as a result of the proposed project. It was determined that temporary impacts during the construction period would depend in large part upon the number of temporary construction workers who would relocate to the area for employment. Although the number of relocating workers is uncertain, it is anticipated that temporary construction worker impacts to community services would be minor at all four proposed sites.

There are an adequate number of law enforcement, fire protection, and emergency response services at all four sites to accommodate the increased temporary population during construction; therefore, no impacts are anticipated to these services. The ratio of hospital beds would remain unchanged for all four sites and, therefore, no impacts are expected to health care capacity. It is not anticipated that construction workers would relocate with their families for temporary employment and, as a result, there would be negligible impact to local schools.

Similarly, it was also determined that impacts to community services during the operational phase of the proposed facilities would be minor at all four proposed sites, less than a 1 percent reduction to the capacity for these services.

### 3.1.19 SOCIOECONOMICS

Socioeconomics impacts were assessed with respect to demographics, regional economics, availability of the workforce, and housing. Evaluations were made based on whether the project would cause displacement of an existing population; alter projected rates of population growth; cause demolition of existing housing; affect on housing demand; cause displacement of existing businesses; affect on local businesses and the economy; cause displacement of existing jobs; affect on local employment or the workforce; and create new employment and economic benefit.

Positive direct and indirect impacts would occur for each of the alternative sites due to increased economic activity related to the creation of 200 new direct jobs, as well as up to 220 indirect or induced jobs. Positive, short-term impacts would also occur at each site during the construction period as a result of construction jobs (between 350 and 700) and associated construction activities. In addition, tax revenues related to FutureGen Project property improvements and associated property tax, as well as public utility tax generated by the facility, would be expected for each alternative. However, projected increases to property and sales tax revenue maybe less than anticipated if the state or local government were to waive or reduce usual assessments as an element of its final offer to the Alliance.

Principal differences between the alternatives are related to the presence of residential properties near the proposed sites, and the potential for decreased property values for those residences. For both of the Texas alternatives, there are no properties near the respective sites that would be affected. Therefore, the housing markets for these alternatives would not be impacted.

Two residences are located adjacent to the Mattoon Site, two other residences are located within 0.25 mile (0.4 kilometer), and 20 additional residences located within 1 mile (1.6 kilometers) may have an unobstructed view of the site. Similarly, three residences are located adjacent to the Tuscola Site, seven residences within 0.5 mile (0.8 kilometer), and several dozen residences within 1 mile (1.6 kilometers) may have an unobstructed view of the site. Direct and adverse long-term impacts on property values in relation to comparable property values in each site's respective markets may occur for the properties adjacent to alternative sites. In addition, values for residences that are further from the site but that would have an unobstructed view of the facility may also be adversely affected. The degree to which property values would be affected is uncertain because there are many variables associated with real estate markets and public sentiment related to industrial facilities.

*All four alternative sites would be eligible to receive tax abatement on property tax revenues for a period of 10 years. This would result in a loss of revenue for each site per year as follows: Mattoon, \$10,188; Tuscola, \$6,695; Jewett, \$5,884; and Odessa, \$2,779.*

### 3.1.20 ENVIRONMENTAL JUSTICE

DOE used demographic information from the U.S. Census Bureau 2000 census to characterize low-income and minority populations, as defined under Executive Order (EO) 12898, within 50 miles (80 kilometers) of the proposed power plant site, sequestration and reservoir sites, and utility and transportation corridors (59 *Federal Register* 7629). The extent of environmental and socioeconomic impacts and anticipated health effects were used as the basis of the impact analysis on populations identified under EO 12898. As a result of this analysis, no populations defined by EO 12898 would be anticipated to experience a disproportionately adverse effect resulting from the construction or operation of any of four proposed power plant sites, sequestration sites and reservoirs, and associated utility and transportation corridors.

No minority populations as defined in EO 12898 exist within the ROI for either the Mattoon or Tuscola sites. Both the Jewett and Odessa sites have minority populations; however, these populations are interspersed among the ROIs. Therefore, impacts resulting from construction and operations identified in other resource areas throughout this EIS were determined not to have a disproportionately high and adverse effect to minority populations for these sites. One of the sequestration wells for the proposed Jewett Sequestration Site would be located within property of the Texas Department of Criminal Justice. The greatest potential health effect, considered unlikely, to this population and the general population was determined to be a release of H<sub>2</sub>S from a pipeline rupture (see Section 3.1.17). A potential risk could also occur at all four sites from a catastrophic accident, terrorism, or sabotage; however, the risk of terrorism or sabotage cannot be predicted.

For all sites, low income populations are located within the ROI when compared to regional and national percentages; however, the percentages of these populations are far below the 50 percent low income threshold defined in EO 12898. In addition, any impacts related to construction that would affect the environment of these populations, would be temporary and not considered disproportionately high and adverse. Short-term job creation during construction may benefit low-income populations. In addition, impacts resulting from operations identified in other resource areas throughout this EIS were determined not to have a disproportionately high and adverse effect to these populations. Long-term job creation during construction may benefit low-income populations.

This section provides a summary comparison of the potential environmental impacts to physical, natural, cultural, and socioeconomic resources for the four site alternatives for the FutureGen Project. Impacts are provided in comparative form in Table 3-3.

**Table 3-3. Summary Comparison of Impacts**

Mattoon	Tuscola	Jewett	Odessa																																																																																																																																																																																																																																																
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No impact to environmental resources; no change in existing conditions. Under the No-Action Alternative, DOE would not share in the cost for constructing and operating the FutureGen Project. Without DOE funding, it would be unlikely that the Alliance would soon undertake the commercial-scale integration of CO <sub>2</sub> capture and geologic sequestration with a coal-fueled power plant.																																																																																																																																																																																																																																																			
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During Normal Plant Operation				SO <sub>2</sub> , 3-hr	0.820	34.85	1,300	SO <sub>2</sub> , 24-hr	0.415	13.51	365	SO <sub>2</sub> , Annual	0.483	3.10	80	NO <sub>2</sub> , Annual	0.674	27.01	100	PM <sub>10</sub> , 24-hr	0.829	55.83	150	PM <sub>10</sub> , Annual	0.099	26.10	50	PM <sub>2.5</sub> , 24-hr	0.829	30.16	35	PM <sub>2.5</sub> , Annual	0.099	13.80	15	CO, 1-hr	10.447	4,018.62	40,000	CO, 8-hr	7.879	1,954.70	10,000	Conc. During Plant Upset Events <sup>1</sup>				SO <sub>2</sub> , 3-hr	511.913	545.94	1,300	SO <sub>2</sub> , 24-hr	89.500	102.59	365	<p><b>Construction:</b> Air emissions of criteria pollutants from construction equipment and land disturbing activities would result in short-term <b>impacts</b> on local air quality.</p> <p><b>Operations:</b> Air emissions of criteria pollutants from power plant and sequestration operations would increase ambient concentrations in air pollutants. Maximum increases would be:</p> <table border="1"> <thead> <tr> <th>Pollutant<sup>3</sup></th> <th>FG</th> <th>FG+Ambient</th> <th>NAAQS</th> </tr> </thead> <tbody> <tr> <td colspan="4">Conc. During Normal Plant Operation</td> </tr> <tr> <td>SO<sub>2</sub>, 3-hr</td> <td>0.542</td> <td>52.89</td> <td>1,300</td> </tr> <tr> <td>SO<sub>2</sub>, 24-hr</td> <td>0.188</td> <td>13.28</td> <td>365</td> </tr> <tr> <td>SO<sub>2</sub>, Annual</td> <td>0.248</td> <td>5.49</td> <td>80</td> </tr> <tr> <td>NO<sub>2</sub>, Annual</td> <td>0.346</td> <td>15.40</td> <td>100</td> </tr> <tr> <td>PM<sub>10</sub>, 24-hr</td> <td>0.376</td> <td>51.71</td> <td>150</td> </tr> <tr> <td>PM<sub>10</sub>, Annual</td> <td>0.051</td> <td>18.05</td> <td>50</td> </tr> <tr> <td>PM<sub>2.5</sub>, 24-hr</td> <td>0.376</td> <td>20.71</td> <td>35</td> </tr> <tr> <td>PM<sub>2.5</sub>, Annual</td> <td>0.051</td> <td>7.75</td> <td>15</td> </tr> <tr> <td>CO, 1-hr</td> <td>8.418</td> <td>7,234.37</td> <td>40,000</td> </tr> <tr> <td>CO, 8-hr</td> <td>4.855</td> <td>3,906.86</td> <td>10,000</td> </tr> <tr> <td colspan="4">Conc. 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During Normal Plant Operation				SO <sub>2</sub> , 3-hr	0.542	52.89	1,300	SO <sub>2</sub> , 24-hr	0.188	13.28	365	SO <sub>2</sub> , Annual	0.248	5.49	80	NO <sub>2</sub> , Annual	0.346	15.40	100	PM <sub>10</sub> , 24-hr	0.376	51.71	150	PM <sub>10</sub> , Annual	0.051	18.05	50	PM <sub>2.5</sub> , 24-hr	0.376	20.71	35	PM <sub>2.5</sub> , Annual	0.051	7.75	15	CO, 1-hr	8.418	7,234.37	40,000	CO, 8-hr	4.855	3,906.86	10,000	Conc. During Plant Upset Events <sup>1</sup>				SO <sub>2</sub> , 3-hr	511.979	564.33	1,300	SO <sub>2</sub> , 24-hr	73.000	86.09	365
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SO <sub>2</sub> , 3-hr	0.717	123.75	1,300																																																																																																																																																																																																																																																
SO <sub>2</sub> , 24-hr	0.262	70.93	365																																																																																																																																																																																																																																																
SO <sub>2</sub> , Annual	0.184	10.65	80																																																																																																																																																																																																																																																
NO <sub>2</sub> , Annual	0.256	30.35	100																																																																																																																																																																																																																																																
PM <sub>10</sub> , 24-hr	0.524	57.86	150																																																																																																																																																																																																																																																
PM <sub>10</sub> , Annual	0.038	26.04	50																																																																																																																																																																																																																																																
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PM <sub>2.5</sub> , Annual	0.038	12.54	15																																																																																																																																																																																																																																																
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SO <sub>2</sub> , 24-hr	88.000	158.67	365																																																																																																																																																																																																																																																
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SO <sub>2</sub> , Annual	0.048	10.52	80																																																																																																																																																																																																																																																
NO <sub>2</sub> , Annual	0.067	30.09	100																																																																																																																																																																																																																																																
PM <sub>10</sub> , 24-hr	0.393	57.73	150																																																																																																																																																																																																																																																
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<sup>1</sup> Unplanned restart emissions of PM<sub>10</sub> and PM<sub>2.5</sub> do not occur during plant upset events. Unplanned restart emissions of NO<sub>2</sub> and CO<sub>2</sub> are lower than steady-state emissions (i.e., <2 percent and <0.2 percent, respectively), therefore impacts are lower.

<sup>2</sup> all = all pollutants and associated averaging period.

<sup>3</sup> **Best and Final Offer (BAFO) Odessa CO<sub>2</sub> pipeline (Option 2) would require a sulfur removal plant. Potential emissions from additional sulfur removal operations would be minimal because the process occurs in an enclosed system. The additional sulfur removal would be required for the original proposal, as well as for the BAFO Option 2.**

FG = FutureGen; tpy = tons per year; NAAQS = National Ambient Air Quality Standards; PSD = Prevention of Significant Deterioration; HAP = Hazardous Air Pollutant; Hg = mercury.

**Table 3-3. Summary Comparison of Impacts**

Mattoon	Tuscola	Jewett	Odessa
<b>Proposed Action – Climate and Meteorology</b>			
<p><b>Construction and Operations:</b> No impacts to climate or meteorology. Potential for severe temperature or weather conditions that could temporarily delay construction or affect operations are:</p> <p>Subzero (&lt;0°Fahrenheit [F] [17.8°Celsius (C)]) days (average): 7.5</p> <p>Snowfall: 1 snowfall of 6 inches (15.2 centimeters) or more and one ice glaze event per year.</p> <p><b>Tornado intensity F1 or greater within an 850 sq. mi. area: 24 over 50 years</b></p> <p>Severe or extreme drought conditions, potential for wildfire; increased number of water trucks to reduce fugitive dust.</p>	<p><b>Construction and Operations:</b> No impacts to climate or meteorology. Potential for severe temperature or weather conditions that could temporarily delay construction or affect operations are:</p> <p>Subzero (&lt;0°F [17.8°C]) days (average): 6</p> <p>Snowfall: 1 snowfall of 6 inches (15.2 centimeters) or more and one ice glaze event per year.</p> <p><b>Tornado intensity F1 or greater within an 850 sq. mi. area: 10 over 50 years</b></p> <p>Same as Mattoon.</p>	<p><b>Construction and Operations:</b> No impacts to climate or meteorology. Potential for severe temperature or weather conditions that could temporarily delay construction or affect operations are:</p> <p>Subzero (&lt;0°F [17.8°C]) days (average): rare</p> <p>Snowfall: Annual snowfall is less than 1.5 inches (3.8 centimeters) and ice glaze events are rare.</p> <p><b>Tornado intensity F1 or greater within an 850 sq. mi. area: 7 over 50 years</b></p> <p>Same as Mattoon.</p>	<p><b>Construction and Operations:</b> No impacts to climate or meteorology. Potential for severe temperature or weather conditions that could temporarily delay construction or affect operations are:</p> <p>Subzero (&lt;0°F [17.8°C]) days (average): rare</p> <p>Snowfall: Annual snowfall is less than 4.5 inches (11.4 centimeters) and ice glaze events are rare.</p> <p><b>Tornado intensity F1 or greater within an 850 sq. mi. area: 6 over 50 years</b></p> <p>Same as Mattoon.</p>

**Table 3-3. Summary Comparison of Impacts**

Mattoon	Tuscola	Jewett	Odessa
<b>Proposed Action – Geology</b>			
<p><b>Construction:</b> <b>Target Formation:</b> Formation: Mt. Simon</p> <p>Injection depth: 1.3 to 1.6 miles (2.1 to 2.6 kilometers)</p> <p>Formation: St. Peter (Optional target reservoir)</p> <p>Injection depth: 0.9 mile (1.4 kilometers)</p> <p>Predicted CO<sub>2</sub> Plume Radius: 1.2 miles (1.9 kilometers)</p> <p><b>Caprock:</b> Formation: Eau Claire Shale Thickness: 500 to 700 feet (152 to 213 meters) Well penetrations (ROI): No known</p>	<p><b>Construction:</b> <b>Target Formation:</b> Formation: Mt. Simon</p> <p>Injection depth: 1.3 to 1.5 miles (2.1 to 2.4 kilometers)</p> <p>Formation: St. Peter (Optional target reservoir)</p> <p>Injection depth: 0.9 mile (1.4 kilometers)</p> <p>Predicted CO<sub>2</sub> Plume Radius: 1.1 miles (1.8 kilometers)</p> <p><b>Caprock:</b> Formation: Eau Claire Shale Thickness: 500 to 700 feet (152 to 213 meters) Well penetrations (ROI): No known</p>	<p><b>Construction:</b> <b>Target Formation:</b> Formation: Woodbine (Primary)</p> <p>Injection depth: 1 to 1.1 miles (1.6 to 1.8 kilometers)</p> <p>Formation: Travis Peak (Secondary)</p> <p>Injection depth: 1.7 to 2.1 mile (2.7 to 3.4 kilometers)</p> <p>Predicted CO<sub>2</sub> Plume Radius: 1.7 miles (2.7 kilometers)</p> <p><b>Caprock (Primary):</b> Formation: Eagle Ford Shale Thickness: 400 feet (122 meters) Well penetrations (ROI): 8 known, up to 57</p>	<p><b>Construction:</b> <b>Target Formation:</b> Formation: Delaware Mountain Group <i>(primary)</i> and <i>Lower</i> Queen Formation <i>(secondary)</i></p> <p>Injection depth: 0.4 to 1 mile (0.6 to 1.6 kilometers)</p> <p>Predicted CO<sub>2</sub> Plume Radius: 1 mile (1.7 kilometers)</p> <p><b>Caprock:</b> Formation: Queen-Seven Rivers Thickness: 700 feet (213 meters) Well penetrations (ROI): 2 known, up to 16</p>
<p><b>Operations:</b></p> <p><b>Earthquake potential:</b> Intensity: Medium (magnitude &lt;5) Likelihood: Possible but not common</p>	<p><b>Operations:</b></p> <p><b>Earthquake potential:</b> Intensity: Same as Mattoon Likelihood: Same as Mattoon</p>	<p><b>Operations:</b></p> <p><b>Earthquake potential:</b> Intensity: Medium (magnitude &lt;4) Likelihood: Possible but not common</p>	<p><b>Operations:</b></p> <p><b>Earthquake potential:</b> Intensity: Medium (magnitude &lt;6) Likelihood: Possible but not common</p>
<p><b>Earthquake occurrences since 1974:</b> Number: 29 Magnitude: 2.7 to 5.0 Distance: Within 100 miles (161 kilometers)</p>	<p><b>Earthquake occurrences since 1974:</b> Number: 30 Magnitude: 2.4 to 5.1 Distance: Within 120 miles (193 kilometers)</p>	<p><b>Earthquake occurrences since 1974:</b> Number: 4 Magnitude: 2.3 to 3.4 Distance: Within 100 miles (161 kilometers)</p>	<p><b>Earthquake occurrences since 1974:</b> Number: 40 Magnitude: 2.3 to 5.7 Distance: Within 120 miles (193 kilometers)</p>

**Table 3-3. Summary Comparison of Impacts**

Mattoon	Tuscola	Jewett	Odessa
<b>Proposed Action – Geology (continued)</b>			
<p><b>Faults:</b> Although no detailed mapping of faults, recent 2D seismic lines indicate no major faulting at the injection site. Possibility exists for faults associated with nearby anticline; however, these are likely sealing faults.</p> <p>Closest Major Fault: New Madrid 200 miles (322 kilometers) south-southwest.</p> <p><b>Potential for Adverse Impacts:</b> Radon displacement: Low Induced seismicity: Low CO<sub>2</sub> leakage due to seal penetrations or faults: Low</p>	<p><b>Faults:</b> Although no detailed mapping of faults, recent 2D seismic lines indicate no major faulting at the injection site. Strong possibility exists for faults associated with steep flank of nearby anticline; however, these are likely sealing faults.</p> <p>Closest Major Fault: New Madrid 230 miles (370 kilometers) south-southwest.</p> <p><b>Potential for Adverse Impacts:</b> Same as Mattoon.</p>	<p><b>Faults:</b> Multiple surface faults within 10 miles (16 kilometers).</p> <p>Closest Major Fault: Mexia-Talco 30 to 35 miles (48.2 to 56.3 kilometers) sealing fault, New Madrid 400 miles (644 kilometers) north-northeast.</p> <p><b>Potential for Adverse Impacts:</b> Same as Mattoon.</p>	<p><b>Faults:</b> No detailed mapping of faults. Quiescent basement fault beneath ROI.</p> <p>Closest Major Fault: Rio Grande Rift system 210 miles (338 kilometers); New Madrid greater than 800 miles (1,287 kilometers).</p> <p><b>Potential for Adverse Impacts:</b> Same as Mattoon.</p>

ROI = Region of influence.

**Table 3-3. Summary Comparison of Impacts**

Mattoon	Tuscola	Jewett	Odessa
<b>Proposed Action – Physiography and Soils</b>			
<p><b>Construction:</b> Soil disturbance (including loss, change of composition and potential of spill contamination).</p> <p><b>Power Plant Site:</b> Up to 200 acres (81 hectares) permanently lost.</p> <p><b>Sequestration Site:</b> Power Plant and Sequestration Site on same parcel of land.</p> <p><b>Utility Corridors:</b> Up to 25.6 acres (10.4 hectares) temporarily disturbed.<sup>1</sup></p> <p><b>Transportation Corridors:</b> Up to 15.9 acres (6.4 hectares) disturbed through construction of infrastructure within the power plant site.</p> <p><b>Operations:</b> Low potential for contamination due to minor spills at the power plant site and along utility corridors.</p>	<p><b>Construction:</b> Soil disturbance (including loss, change of composition and potential of spill contamination).</p> <p><b>Power Plant Site:</b> Same as Mattoon.</p> <p><b>Sequestration Site:</b> Up to 10 acres (4 hectares) permanently lost.</p> <p><b>Utility Corridors:</b> Up to 32.4 acres (13.1 hectares) temporarily disturbed.</p> <p><b>Transportation Corridors:</b> Up to 6.7 acres (2.7 hectares) disturbed through construction of infrastructure within the power plant site.</p> <p><b>Operations:</b> Same as Mattoon.</p>	<p><b>Construction:</b> Soil disturbance (including loss, change of composition and potential of spill contamination).</p> <p><b>Power Plant Site:</b> Same as Mattoon.</p> <p><b>Sequestration Site:</b> Same as Tuscola.</p> <p><b>Utility Corridors:</b> Up to 358 acres (145 hectares) temporarily disturbed.</p> <p><b>Transportation Corridors:</b> <i>Existing railroad and road corridors are in place, therefore there would be no soil disturbance through construction of the infrastructure within the power plant site.</i></p> <p><b>Operations:</b> Same as Mattoon.</p>	<p><b>Construction:</b> Soil disturbance (including loss, change of composition and potential of spill contamination).</p> <p><b>Power Plant Site:</b> Same as Mattoon.</p> <p><b>Sequestration Site:</b> Same as Tuscola.</p> <p><b>Utility Corridors:</b> Up to 341 acres (138 hectares) temporarily disturbed. <b>Up to 744 acres (301 hectares).</b><sup>1</sup></p> <p><b>Transportation Corridors:</b> Up to 1.8 acres (0.7 hectare) disturbed through construction of infrastructure within the power plant site.</p> <p><b>Sulfur removal plant may require additional transportation corridors.</b><sup>2</sup></p> <p><b>Operations:</b> Same as Mattoon.</p>

<sup>1</sup> If the BAFO options are selected then up to 744 acres (301 hectares) would be impacted; BAFO Odessa process water pipeline corridor would have soil disturbance up to 103 acres (41.7 hectares); Odessa Option 1 CO<sub>2</sub> pipeline, 545 acres (221 hectares); and up to 96 acres (38.8 hectares) for CO<sub>2</sub> pipeline spurs.

<sup>2</sup> BAFO Odessa CO<sub>2</sub> pipeline (Option 2) may require transportation corridors for the sulfur removal plant at the FutureGen Power Plant site or another site (currently unknown).

**Table 3-3. Summary Comparison of Impacts**

Mattoon	Tuscola	Jewett	Odessa
<b>Proposed Action – Groundwater</b>			
<p><b>Construction:</b> No groundwater use, impacts are not anticipated.</p> <p><b>Operations:</b> Process water source; treated wastewater, no impacts to local aquifers anticipated.</p> <p>Aquifer: n/a</p> <p>Aquifer capacity: n/a</p> <p>Potable groundwater use to depth: Approximately 175 feet (53.3 meters)</p> <p>Usage of capacity: n/a</p> <p>Depth to CO<sub>2</sub> injection zone: Mt. Simon: 1.3 to 1.6 miles (2.1 to 2.6 kilometers) St Peter (optional): 0.9 mile (1.4 kilometers)</p> <p>Impacts of CO<sub>2</sub> sequestration on <b>underground source of drinking water</b> considered unlikely. Abandoned wells penetrating primary seal would need to be assessed and closed properly.</p> <p>Existing wells through Caprock: 0</p>	<p><b>Construction:</b> No groundwater use, impacts are not anticipated.</p> <p><b>Operations:</b> Process water source; <b>industrial reservoir filled with water from Kaskaskia River</b>. Short-term impacts from supplemental use of groundwater.</p> <p>Aquifer: Mahomet (supplemental only)</p> <p>Aquifer capacity: <b>over 400 MGD (&gt; 1.5 billion liters per day)</b><sup>1</sup></p> <p>Potable groundwater use to depth: Approximately 100 feet (31 meters)</p> <p>Usage of capacity: 26 percent (short-term)</p> <p>Depth to CO<sub>2</sub> injection zone: Mt Simon: 1.3 to 1.5 miles (2.1 to 2.4 kilometers) St Peter (optional): 0.9 mile (1.4 kilometers)</p> <p>Same as Mattoon.</p> <p>Existing wells through Caprock: 0</p>	<p><b>Construction:</b> No groundwater use, impacts are not anticipated.</p> <p><b>Operations:</b> Groundwater impact due to increase in aquifer use for power plant process water. Sustainability of aquifer would be maintained.</p> <p>Aquifer: Carrizo-Wilcox</p> <p>Aquifer capacity: 1.23 x 10<sup>8</sup> m<sup>3</sup>/day</p> <p>Potable groundwater exists to depth: Approximately 1,400 feet (427 meters)</p> <p>Usage of capacity: 4 percent</p> <p>Depth to CO<sub>2</sub> injection zone: Woodbine: 1.0 mile (1.6 kilometers); Travis Peak: 1.7 miles (2.7 kilometers)</p> <p>Same as Mattoon.</p> <p>Existing wells through Caprock: Up to 57</p>	<p><b>Construction:</b> No groundwater use, impacts are not anticipated.</p> <p><b>Operations:</b> Groundwater impact due to increase in aquifer use for power plant process water.</p> <p>Aquifer: Undetermined, multiple options; <b>CRMWD would supply water, adequate capacity.</b><sup>2</sup></p> <p>Aquifer capacity: 1.28 x 10<sup>7</sup> to 7.2 x 10<sup>7</sup> m<sup>3</sup>/day</p> <p>Potable groundwater exists to depth: Approximately 1,500 feet (457 meters)</p> <p>Usage of capacity: 7 to 39 percent</p> <p>Depth to CO<sub>2</sub> injection zone: 0.4 mile (0.6 kilometer)</p> <p>Same as Mattoon.</p> <p>Existing wells through Caprock: Up to 16</p>

<sup>1</sup> Figure represents the sustained yield of the aquifer, not total capacity (ISWS, 2007). Lyondell-Equistar well field currently has a capacity of 16 to 17 MGD (61 to 64 MLD).

<sup>2</sup> BAFO Odessa, CRMWD would supply process water utilizing 3 reservoirs and 4 active well fields. Groundwater would be used during the summer months to meet peak demands. FutureGen consumption equals 1.6 x 10<sup>4</sup> m<sup>3</sup>/day (4.3 MGD), which is minimal compared to the aquifer capacities reported in Table S-A and Table 2-A for the municipal well field in Ward County (9.0 x 10<sup>4</sup> m<sup>3</sup>/day [24.0 MGD]) and compared to the regional aquifer capacity values presented in the Table.

n/a = not applicable.

**Table 3-3. Summary Comparison of Impacts**

Mattoon	Tuscola	Jewett	Odessa
<b>Proposed Action – Surface Water</b>			
<p><b>Construction:</b> Low potential for increased sediment loads, stream channel erosion, and non-point source pollution from land disturbance and stream crossings.</p> <p>Pipeline stream crossings: 5</p> <p><b>Operations:</b> Streams affected: Cassell and Kickapoo creek flows reduced by <b>diversion of effluent discharge water</b> from Mattoon and possibly Charleston wastewater treatment plants <b>to provide process water (3,000 gallons per minute [gpm] [11,356 liters per minute [lpm])</b>. <b>Proposed reservoir would provide flexibility to mitigate downstream flow impacts.</b></p> <p>Sanitary discharge from plant site: Municipal treatment, no surface water discharges or impacts anticipated.</p> <p>No CO<sub>2</sub> pipeline stream crossings.</p>	<p><b>Construction:</b> Same as Mattoon.</p> <p>Pipeline stream crossings: 4</p> <p><b>Operations:</b> Streams affected: Kaskaskia River flows reduced by process water withdrawals (3,000 gpm [11,356 lpm]) from Lyondell-Equistar reservoir.</p> <p>Sanitary discharge from plant site: On-site system, effluent recycled from process water. Additional option for municipal treatment, no surface water discharges or impacts anticipated.</p> <p>Low potential for impacts from CO<sub>2</sub> pipeline leaks at stream crossings.</p>	<p><b>Construction:</b> Same as Mattoon.</p> <p>Pipeline stream crossings: 30</p> <p><b>Operations:</b> Streams affected: No water withdrawals.</p> <p>Sanitary discharge from plant site: On-site system, effluent recycled from process water, no surface water discharges or impacts anticipated.</p> <p>Same as Tuscola.</p>	<p><b>Construction:</b> Same as Mattoon.</p> <p>Pipeline stream crossings: Approximately 3 to 6 <b>ephemeral draws plus Pecos River</b><sup>1</sup></p> <p><b>Operations:</b> Streams affected: No water withdrawals. <b>Up to 4.3 MGD (3,000 gpm)</b>.<sup>2</sup></p> <p>Sanitary discharge from plant site: On-site system, effluent recycled from process water, no surface water discharges or impacts anticipated.</p> <p>Same as Tuscola.</p>

<sup>1</sup> BAFO Odessa CO<sub>2</sub> pipeline (Options 1 and 2) would cross the Pecos River (impaired stream).

<sup>2</sup> BAFO Odessa process water option would withdraw up to 4.3 MGD (3,000 gpm) from surface water: O.H. Ivie Reservoir, E.V. Spence Reservoir, and Lake S.B. Thomas (42.8 MGD available aggregate capacity).

**Table 3-3. Summary Comparison of Impacts**

<b>Mattoon</b>	<b>Tuscola</b>	<b>Jewett</b>	<b>Odessa</b>
<b>Proposed Action – Wetlands and Floodplains</b>			
<p><b>Construction:</b> <b>Power Plant Site:</b> Site design and layout would avoid impacts to wetlands that are on site as indicated below:</p> <p>Wetlands present: Low quality farm pond 0.05 acre<sup>1</sup> (0.02 hectare)</p> <p>Floodplains present: None</p> <p><b>Sequestration Site:</b> The sequestration site is located on the same property as the power plant site.</p> <p>Floodplains present: None</p>	<p><b>Construction:</b> <b>Power Plant Site:</b> Site design and layout would avoid impacts to wetlands that are on site as indicated below:</p> <p>Wetlands present: None</p> <p>Floodplains present: None</p> <p><b>Sequestration Site:</b> Injection wells would be placed to avoid wetlands and floodplains.</p> <p>Wetlands present: 4 areas <b>for a total of up to 5 acres<sup>1</sup></b> (2 hectares)</p> <p>Floodplains present: None</p>	<p><b>Construction:</b> <b>Power Plant Site:</b> Site design and layout would avoid impacts to wetlands that are on site as indicated below:</p> <p>Wetlands present: Low quality up to 2 acres (0.8 hectare) Moderate quality up to 0.1 acre (0.04 hectare) Low quality ponds up to 18 acres (7.3 hectares)</p> <p>Floodplains present: None</p> <p><b>Sequestration Site:</b> Injection wells would be placed to avoid wetlands and floodplains.</p> <p>Wetlands present: Over 43*</p> <p><i>*National Wetlands Inventory (NWI) mapping indicates that over 43 forested, scrub-shrub, and emergent wetlands associated with streams and on-channel stock ponds are also located within the region of influence (ROI). Wetland delineation required for verification.</i></p> <p>Floodplains present: 25 percent of ROI in 100-year floodplains</p>	<p><b>Construction:</b> <b>Power Plant Site:</b> Site design and layout would avoid impacts to wetlands that are on site as indicated below:</p> <p>Wetlands present: None</p> <p>Floodplains present: None</p> <p><b>Sequestration Site:</b> Injection wells would be placed to avoid wetlands and floodplains.</p> <p>Wetlands present: None mapped*</p> <p><i>*Indicated by NWI mapping. Wetland delineation would be required for verification.</i></p> <p>Floodplains present: Currently unmapped*</p> <p><i>*Natural Resources Conservation Service (NRCS) soils data indicate that there are areas within the sequestration site that range from "none" to "rare" to "frequent."</i></p>

<sup>1</sup> Wetland acreage (hectares) are based upon field-verified wetland delineations conducted in August 2006.

**Table 3-3. Summary Comparison of Impacts**

Mattoon	Tuscola	Jewett	Odessa
<b>Proposed Action – Wetlands and Floodplains (continued)</b>			
<p><b>Utility and Transportation Corridors:</b> Directional drilling and site planning would be used to avoid these features <b>and minimize impacts.</b></p> <p>Wetlands: up to 29.2 acres<sup>1</sup> (11.8 hectares)</p> <p>Floodplains: In certain segments</p> <p>Temporary impacts from placement of construction equipment and trenching for underground utilities.</p> <p><b>Operations:</b> No impacts to wetlands or floodplains are anticipated.</p>	<p><b>Utility and Transportation Corridors:</b> Directional drilling and site planning would be used to avoid these features <b>and minimize impacts.</b></p> <p>Wetlands: up to 4.2 acres<sup>1</sup> (1.7 hectares)</p> <p>Floodplains: In certain segments</p> <p>Same as Mattoon.</p> <p><b>Operations:</b> Water levels in process water reservoir would fluctuate due to water uptakes. Minimal impact anticipated because pond currently experiences these types of fluctuations and the wetland is low value.</p>	<p><b>Utility and Transportation Corridors:</b> Directional drilling and site planning would be used to avoid these features <b>and minimize impacts.</b></p> <p>Wetlands: Over 90 <b>acres</b>*</p> <p><i>*NWI mapping indicates that over 90 forested, scrub-shrub, and emergent wetlands associated with streams and on-channel stock ponds are also located within the ROI. Wetland delineation required for verification.</i></p> <p>Floodplains: Portions of all seven segments of CO<sub>2</sub> pipeline</p> <p>Same as Mattoon.</p> <p><b>Operations:</b> Same as Mattoon.</p>	<p><b>Utility and Transportation Corridors:</b> Directional drilling and site planning would be used to avoid these features <b>and minimize impacts.</b></p> <p>Wetlands: None mapped* <b>Up to 23.9 acres (9.7 hectares)</b>*<sup>2</sup></p> <p><i>*Indicated by NWI mapping. Wetland delineation would be required for verification.</i></p> <p>Floodplains: In certain segments of CO<sub>2</sub> pipeline</p> <p>Same as Mattoon.</p> <p><b>Operations:</b> Same as Mattoon.</p>

<sup>1</sup> Wetland acreage (hectares) are based upon field-verified wetland delineations conducted in August 2006.

<sup>2</sup> BAFO Odessa process water pipeline would potentially impact 1 intermittent Palestine wetland up to 8 acres (3.2 hectares). Odessa CO<sub>2</sub> pipeline (Options 1 and 2) would potentially impact up to 15.9 acres (6.4 hectares) for a total impact of 23.9 acres (9.7 hectares).

**Table 3-3. Summary Comparison of Impacts**

Mattoon	Tuscola	Jewett	Odessa
Proposed Action – Biological Resources			
<p><b>Construction: Power Plant Site:</b> Up to 200 acres (81 hectares) row crops would be lost.</p> <p>1 farm pond could be impacted, resulting in a permanent loss of aquatic habitat.</p> <p><b>Sequestration Site:</b> Same footprint as power plant site, no additional loss.</p> <p>Potential threatened and endangered (T&amp;E) species present include the Indiana Bat. Surveys may be required.</p>	<p><b>Construction: Power Plant Site:</b> Same as Mattoon.</p> <p>No aquatic habitat present.</p> <p><b>Sequestration Site:</b> Up to 10 acres (4 hectares) row crops would be lost.</p> <p>Consultation with Illinois Department of Natural Resources, no threatened or endangered species are expected to occur within the sequestration site.</p>	<p><b>Construction: Power Plant Site:</b> Up to 200 acres (81 hectares) of mixed oak/grassland would be lost.</p> <p>3 intermittent tributary streams; 3 man-made impoundments could be impacted, resulting in permanent loss of aquatic habitat.</p> <p>Potential T&amp;E species present include the Navasota ladies'-tresses. Surveys may be required.</p> <p><b>Sequestration Site:</b> Up to 10 acres (4 hectares) mixed oak/grassland would be lost.</p> <p>Potential T&amp;E species present include the interior least tern, Houston toad, Bachman's sparrow, white-faced Ibis and state rare invertebrates. Surveys may be required.</p>	<p><b>Construction: Power Plant Site:</b> Up to 200 acres (81 hectares) of mesquite lotebush-brush and mesquite-juniper brush would be lost.</p> <p>No aquatic habitat present.</p> <p>Potential T&amp;E species present at the sequestration site includes the Texas Horned Lizard. Surveys may be required.</p> <p><b>Sequestration Site:</b> Up to 10 acres (4 hectares) mesquite-juniper brush would be lost.</p> <p>Potential T&amp;E species present include the Texas horned lizard. Surveys may be required.</p>

**Table 3-3. Summary Comparison of Impacts**

Mattoon	Tuscola	Jewett	Odessa
<b>Proposed Action – Biological Resources (continued)</b>			
<p><b>Utility Corridors:</b> Up to 35.3 miles (56.8 kilometers) total, of which 18.8 miles (30.3 kilometers) within new ROW, primarily agricultural row crops would be lost.</p> <p>Aquatic habitat of 5 perennial streams could be temporarily impacted by trenching.</p> <p>Potential T&amp;E species present include the Indiana Bat, Kirkland’s snake, and Eastern sand darter. Surveys may be required.</p>	<p><b>Utility Corridors:</b> Up to 31.9 miles (51.3 kilometers) total, of which 16.9 miles (27.2 kilometers) within new ROW, primarily agricultural row crops would be lost.</p> <p>Aquatic habit limited, intermittent streams.</p> <p>Potential T&amp;E species present include Kirkland’s snake. Surveys may be required.</p>	<p><b>Utility Corridors:</b> Up to 63 miles (101 kilometers) total, of which 13 miles (20.9 kilometers) within new ROW, primarily oak/grassland (high quality deer and turkey hunting ground) would be <b>temporarily impacted during pipeline construction.</b></p> <p>Aquatic habitat of 14 perennial and 39 intermittent streams could be temporarily impacted by trenching.</p> <p>Potential T&amp;E species present include interior least tern, Houston toad, Bachman’s sparrow, white-fared Ibis and state rare invertebrates. Surveys may be required.</p>	<p><b>Utility Corridors:</b> Up to 128.5 miles (207 kilometers) total, of which 68.7 miles (111 kilometers) within new ROW, primarily <b>non-arable brush lands would be impacted.</b></p> <p>Intermittent/ephemeral streams only, limited aquatic habitat.</p> <p>Potential T&amp;E species present include the Texas horned lizard. Surveys may be required.</p>

**Table 3-3. Summary Comparison of Impacts**

Mattoon	Tuscola	Jewett	Odessa
<b>Proposed Action – Cultural Resources</b>			
<p><b>Construction:</b> No known cultural resources at the power plant or sequestration site, no impacts anticipated.</p> <p>Phase I survey may be needed for certain utility corridor segments.</p> <p><b>Operations:</b> Impacts would only occur during construction.</p>	<p><b>Construction:</b> Same as Mattoon.</p> <p>Same as Mattoon.</p> <p><b>Operations:</b> Same as Mattoon.</p>	<p><b>Construction:</b> No known cultural resources at the power plant site, no impacts anticipated.</p> <p>Known cultural sites along CO<sub>2</sub> pipeline corridor segments: A-C; 3 B-C; 15 C-D; 13 D-F; 1 F-H; 3 33 recorded sites within region of influence of sequestration site. Phase I surveys and consultation would be needed for these CO<sub>2</sub> pipeline segments.</p> <p><b>Operations:</b> Same as Mattoon.</p>	<p><b>Construction:</b> Same as Jewett.</p> <p>Phase I survey needed for all water, CO<sub>2</sub> pipeline, and transmission line corridors.</p> <p>Consultation needed for potential cultural resources at the sequestration site.</p> <p>Fossil bearing rock formations are extensive in the region of the sequestration site; however, no impacts to unique or irreplaceable invertebrate paleontological resources anticipated. Vertebrate paleontological resources could be impacted.</p> <p><b>Operations:</b> Same as Mattoon.</p>

**Table 3-3. Summary Comparison of Impacts**

Mattoon	Tuscola	Jewett	Odessa
<b>Proposed Action – Land Use</b>			
<p><b>Construction:</b> <b>Power Plant Site:</b> Land conversion, acres affected: Up to 200 acres (81 hectares)  Change of land use: Farmland to industrial.  Oil or gas wells displaced: 0  Prime farmland converted: Up to 200 acres (81 hectares), Land Evaluation and Site Assessment (LESA) points = 255 which exceeds the 225 threshold. Site would be reevaluated for change in land use.  Surrounding land uses: 2 residences (directly adjacent) 2 residences (within 0.25 mile [0.4 kilometer]) 20 residences (within 1 mile [1.6 kilometers])  Airspace and Federal Aviation Administration (FAA) conformance: Stacks would be lighted; FAA notification not required.  Conforming with zoning requirements: No conflict. Current zoning: Enterprise Zone: industrial.  <b>Sequestration Site:</b> Land use acres changed: Same as Power Plant Site.</p>	<p><b>Construction:</b> <b>Power Plant Site:</b> Land conversion, acres affected: Same as Mattoon.  Change of land use: Same as Mattoon.  Oil or gas wells displaced: 0  Prime farmland converted: Up to 200 acres (81 hectares), LESA points = 239. Site would be reevaluated for change in land use.  Surrounding land uses: 3 residences (adjacent) 7 residences (within 0.5 mile [0.8 kilometer]); several dozen (within one mile [1.6 kilometers])  Airspace and FAA conformance: Stacks would be lighted; FAA notification required.  Conforming with zoning requirements: Same as Mattoon. Current zoning: Industrial.  <b>Sequestration Site:</b> Land use acres changed: Up to 10 acres (4 hectares) farmland to industrial.</p>	<p><b>Construction:</b> <b>Power Plant Site:</b> Land conversion, acres affected: Same as Mattoon.  Change of land use: Industrial storage and pasture to industrial.  Oil or gas wells displaced: Up to 3  Prime farmland converted: Up to 5 acres (2 hectares)  Surrounding land uses: 1 small chapel and cemetery (within 1 mile [1.6 kilometers]) no residences.  Airspace and FAA conformance: Same as Mattoon.  Conforming with zoning requirements: Same as Mattoon. Current zoning: None; surrounded by industrial properties.  <b>Sequestration Site:</b> Land use acres changed: Up to 10 acres (4 hectares) ranch and state land to industrial.</p>	<p><b>Construction:</b> <b>Power Plant Site:</b> Land conversion, acres affected: Same as Mattoon.  Change of land use: Ranch, oil and gas to industrial.  Oil or gas wells displaced: Up to 2  Prime farmland converted: None  Surrounding land uses: 3 habitable residences (within 1 mile [1.6 kilometers])  Airspace and FAA conformance: Same as Mattoon.  Conforming with zoning requirements: Same as Mattoon. Current zoning: None; industrial facilities in the vicinity.  <b>Sequestration Site:</b> Land use acres changed: Up to 10 acres (4 hectares) grazing and oil and gas production to industrial.</p>

**Table 3-3. Summary Comparison of Impacts**

Mattoon	Tuscola	Jewett	Odessa
<b>Proposed Action – Land Use (continued)</b>			
<p><b>Mineral Rights:</b> Option contract includes mineral rights for 444 acres (180 hectares). May require purchase of additional rights to include 0.25 mile (0.4 kilometer) buffer.</p> <p><b>Utility Corridors:</b> Approximate new ROW 18.8 miles (30.3 kilometers) (approximate): 11 to 27 miles (17.7 to 43.5 kilometers) variable width. <b>Approximately new ROW 1 mile (1.6 kilometers).<sup>1</sup></b> Impacts of new ROW: Temporary disruption of existing use, existing uses could continue after construction.</p> <p>Temporary impact to the use of Lincoln Prairie Grass Bike Trail during construction of process water pipeline from City of Charleston.</p> <p><b>Operations:</b> <b>Power Plant Site:</b> Site is approximately 444 acres (180 hectares), with 200 acres (81 hectares) permanently converted; remaining 244 acres (99 hectares) could be leased for continued agricultural use.</p>	<p><b>Mineral Rights:</b> Option to 10 acres (4 hectares). Title searches for remainder of site are underway.</p> <p><b>Utility Corridors:</b> Approximate new ROW up to 16.9 miles (27.2 kilometers) variable width.</p> <p>Impacts of new ROW: If the 3-mile (4.8-kilometer) ROW for the transmission line is selected, nine landowners would be temporarily impacted; existing uses could continue after construction.</p> <p><b>Operations:</b> <b>Power Plant Site:</b> Site is approximately 345 acres (140 hectares), with 200 acres (81 hectares) permanently converted; remaining 145 acres (59 hectares) could be leased for continued agricultural use.</p>	<p><b>Mineral Rights:</b> 50-year lease option with a waiver for mineral rights for at least three injection sites; however, title searches would need to be conducted.</p> <p><b>Utility Corridors:</b> Approximate new ROWs between 10 miles (16.1 kilometers) and 13 miles (20.9 kilometers) variable width.</p> <p>Impacts of new ROW: Same as Mattoon.</p> <p><b>Operations:</b> <b>Power Plant Site:</b> Site is approximately 400 acres (162 hectares), with 200 acres (81 hectares) permanently converted; remaining 200 acres (81 hectares) could continue as pasture.</p>	<p><b>Mineral Rights:</b> University of Texas controls land and historically provide subsurface access through easements. Title searches would need to be conducted. The University has indicated it would grant a 50-year lease.</p> <p><b>Utility Corridors:</b> Approximate new ROW 68.7 miles (111 kilometers) variable width. <b>Approximately new ROW 2 miles (25.7 kilometers).<sup>2</sup></b> Impacts of new ROW: Same as Mattoon.</p> <p><b>Operations:</b> <b>Power Plant Site:</b> Site is approximately 600 acres (243 hectares), with 200 acres (81 hectares) permanently converted; remaining 400 acres (162 hectares) could continue as ranch land.</p>
<p><b>Sequestration Site:</b> Same as power plant site.</p>	<p><b>Sequestration Site:</b> 10 acres (4 hectares) permanently converted; remaining land could remain in agricultural use.</p>	<p><b>Sequestration Site:</b> 10 acres (4 hectares) permanently converted; remaining land could remain as ranch land.</p>	<p><b>Sequestration Site:</b> 10 acres (4 hectares) permanently converted; remaining land could continue as ranch land and oil and gas activities.</p>

<sup>1</sup> BAFO Mattoon process waterline would require approximately 1 mile (1.6 kilometers) of new ROW.

<sup>2</sup> BAFO Odessa process waterline would require approximately 1 mile (1.6 kilometers) of new ROW.

**Table 3-3. Summary Comparison of Impacts**

Mattoon	Tuscola	Jewett	Odessa
<b>Proposed Action – Aesthetics</b>			
<p><b>Power Plant Site:</b> <b>Construction:</b> Visual intrusion, traffic and noise to nearby residences.</p> <p><b>Operations:</b> Visual intrusion, traffic and noise to nearby residences.</p> <p>Nearby receptors:     2 residences                                   (adjacent to site)                                   2 residences                                   (within 0.25 mile [0.4 kilometer])                                   20 residences                                   (within 1 mile [1.6 kilometers])</p> <p>Daytime visibility: Downtown Mattoon, motorists, and communities within 7 to 8 miles (11.3 to 13 kilometers).</p> <p>Visibility from public areas: Lake Mattoon and Paradise Lake.</p> <p>Nighttime visibility: Downtown Mattoon, travelers on roadways, and communities within 7 to 8 miles (11.3 to 12.9 kilometers).</p> <p><b>Sequestration Site:</b> Nearby receptors: Same as power plant site.</p>	<p><b>Power Plant Site:</b> <b>Construction:</b> Same as Mattoon.</p> <p><b>Operations:</b> Same as Mattoon.</p> <p>Nearby receptors:     3 residences                                   (adjacent to site)                                   7 residences                                   (within 0.5 mile [0.8 kilometer])                                   Several dozen residences                                   (within 1 mile [1.6 kilometers])</p> <p>Daytime visibility: Downtown Tuscola, motorists, and communities within 7 to 8 miles (11.3 to 13 kilometers).</p> <p>Visibility from public areas: Ervin Park</p> <p>Nighttime visibility: Downtown Tuscola, travelers on roadways, and communities within 7 to 8 miles (11.3 to 12.9 kilometers).</p> <p><b>Sequestration Site:</b> Nearby receptors: Up to 10 residential properties.</p>	<p><b>Power Plant Site:</b> <b>Construction:</b> There are no nearby residences; thus, no visual intrusion, traffic or noise impacts.</p> <p><b>Operations:</b> Same as Mattoon.</p> <p>Nearby receptors:     No residences                                   (adjacent to or within 1 mile [1.6 kilometers] of site)</p> <p>Daytime visibility: 0.5 to 1 miles (0.8 to 1.6 kilometers).</p> <p>Visibility from public areas: None</p> <p>Nighttime visibility: minimal</p> <p><b>Sequestration Site:</b> Nearby receptors: Minimal, travelers on adjacent county roads.</p>	<p><b>Power Plant Site:</b> <b>Construction:</b> Same as Mattoon.</p> <p><b>Operations:</b> Same as Mattoon.</p> <p>Nearby receptors:     No residences                                   (adjacent to site)                                   4 residences                                   (within 0.5 mile [0.8 kilometer])</p> <p>Daytime visibility: Motorists within 7 to 8 miles (11.3 to 13 kilometers).</p> <p>Visibility from public areas: None</p> <p>Nighttime visibility: Travelers on roadways and a few residences within 7 to 8 miles (11.3 to 12.9 kilometers).</p> <p><b>Sequestration Site:</b> Nearby receptors: Up to 3 residential properties and travelers along I-10.</p>

**Table 3-3. Summary Comparison of Impacts**

Mattoon	Tuscola	Jewett	Odessa
<b>Proposed Action – Aesthetics (continued)</b>			
<p><b>Utility Corridors:</b> Temporary receptor impacts (buried utilities): The use of Prairie Grass Bike Trail and 1<sup>st</sup> and 2<sup>nd</sup> streets and Lafayette Avenue would be temporarily interrupted during construction of utilities.</p> <p>Permanent receptor impacts (High Voltage Transmission Line [HVTL] utilities): Residential properties within 0.25 mile (0.4 kilometer) would have view of HVTL.</p>	<p><b>Utility Corridors:</b> Temporary receptor impacts (buried utilities): 12 residences within 0.25 mile (0.4 kilometer) of proposed CO<sub>2</sub> pipeline may experience visual impacts during construction layout.</p> <p>Permanent receptor impacts (HVTL utilities): 150 residential properties within 0.25 mile (0.4 kilometer) would have view of HVTL.</p>	<p><b>Utility Corridors:</b> Temporary receptor impacts (buried utilities): Receptors adjacent to up to 45 miles (72.4 kilometers) of CO<sub>2</sub> pipeline.</p> <p>Permanent receptor impacts (HVTL utilities): Minimal receptors along up to 2 miles (3.2 kilometers) of new transmission line would have view of HVTL.</p>	<p><b>Utility Corridors:</b> Temporary receptor impacts (buried utilities): Receptors adjacent to up to 54 miles (86.9 kilometers) of water pipeline and 6 miles (9.7 kilometers) of CO<sub>2</sub> pipeline.</p> <p>Permanent receptor impacts (HVTL utilities): Up to 4 residences and travelers along I-20 for up to 2 miles (3.2 kilometers) of new transmission line would have view of HVTL.</p> <p><b>Potential visual impacts of sulfur removal plant and 2 booster pumps.<sup>1</sup></b></p>

<sup>1</sup> *BAFO Odessa CO<sub>2</sub> pipeline (Option 2) may result in potential visual impacts from the sulfur removal plant at the FutureGen Power Plant or another location (currently unknown) and 2 booster pumps (located on CO<sub>2</sub> pipeline).*

**Table 3-3. Summary Comparison of Impacts**

Mattoon	Tuscola	Jewett	Odessa
Proposed Action – Transportation and Traffic			
<p><b>Construction:</b> <b>Power Plant Site:</b> SR 121 would temporarily degrade from Level of Service (LOS) C to D, which represents traffic conditions approaching unstable flow; however, this is typically considered acceptable for a temporary condition (44 months).  CR 13 (between SR 121 and CH 18) would temporarily degrade from LOS A to C, which represents stable flow.  Truck routes may be designated to include I-57, CH 18, and CR 13 to reduce traffic through Mattoon.</p> <p><b>Utility Corridors:</b> Up to 35 one-way trips would be added to existing afternoon peak period; however, because construction of utilities would be spread out along the length of corridors, delays to traffic are expected to be minor and temporary.</p> <p><b>Transportation Corridors:</b> Upgrade of CR 13 and the intersection of CR 13 and SR 121 are planned and would cause localized traffic delays; however, a state-required traffic management plan would limit major disruption of traffic, and delays would be temporary.</p>	<p><b>Construction:</b> <b>Power Plant Site:</b> CR 1050N and CR 750E would temporarily (44 months) degrade from LOS A to C, which represents stable traffic flow.  Truck routes may be designated to include I-57, US 36, CR 1050N and CR 750E to reduce traffic through Tuscola.</p> <p><b>Utility Corridors:</b> Up to 45 one-way trips would be added to existing afternoon peak period; however, because construction of utilities would be spread out along the length of corridors, delays to traffic are expected to be minor and temporary.</p> <p><b>Transportation Corridors:</b> No roadway or intersection improvements planned; therefore, no impacts to vehicular traffic are expected. Construction of new railroad sidetrack is expected to have minimal and temporary impacts to existing CSX Railroad operations because the CSX ROW in this location contains switching facilities that would allow approaching trains to be switched away from the track to which the sidetrack is being connected.</p>	<p><b>Construction:</b> <b>Power Plant Site:</b> FM 39 would temporarily degrade from LOS B to D, which represents traffic conditions approaching unstable flow; however, this is typically considered acceptable for a temporary condition. SH 164 would temporarily (44 months) degrade from LOS B to C, which represents stable flow.</p> <p><b>Utility Corridors:</b> Up to 60 one-way trips would be added to existing afternoon peak period; however, because construction of utilities would be spread out along the length of corridors, delays to traffic are expected to be minor and temporary.</p> <p><b>Transportation Corridors:</b> No roadway or intersection improvements planned, and therefore, no impacts to transportation resources are expected. Construction of new railroad sidetrack is expected to have temporary impacts to existing Burlington Northern Santa Fe Railroad operations. Impacts would be minimized by completing connection during hours when this track has lightest expected traffic.</p>	<p><b>Construction:</b> <b>Power Plant Site:</b> FM 1601 would temporarily degrade from LOS A to D, which represents traffic conditions approaching unstable flow; however, this is typically considered acceptable for a temporary (44 months) condition.</p> <p><b>Utility Corridors:</b> Up to 110 one-way trips would be added to existing afternoon peak period, because construction of utilities would be spread out along the length of corridors, delays to traffic are expected to be minor and temporary.</p> <p><b>Transportation Corridors:</b> One grade-separated crossing would be required to extend FM 1601 under railroad and would result in temporary localized traffic delays (additional traffic numbers for this project component were included in traffic analysis conducted for proposed power plant site). Construction of new railroad sidetrack is expected to have temporary impacts to existing Union Pacific Railroad operations. Impacts would be minimized by completing connection during hours when this track has lightest expected traffic.</p>

**Table 3-3. Summary Comparison of Impacts**

Mattoon	Tuscola	Jewett	Odessa
<b>Proposed Action – Transportation and Traffic (continued)</b>			
<p><b>Construction/Operations:</b> Changes to traffic signal timings may be required at the CH 18/I-57 ramp intersections to accommodate changes in the turning volumes.</p> <p><b>Operations:</b> CR 13 (between SR 121 and CH 18) would degrade from LOS A to B, which represents reasonably free flow of traffic. Other roadway LOSs would remain the same.</p> <p>Rail traffic on Canadian National main line and Peoria spur would increase by 10 and 71 percent, respectively, or less than two additional trains per day.</p> <p>Approximately one additional train per day at two at-grade crossings of Peoria spur would delay traffic 6 to 7 minutes at each crossing. No additional railroad crossing protection would be required.</p>	<p><b>Construction/Operations:</b> Changes to traffic signal timings may be required at the US 36/I-57 ramp intersections to accommodate changes in the turning volumes at those intersections.</p> <p><b>Operations:</b> CR 1050N and CR 750E would degrade from LOS A to B, which represents reasonably free flow of traffic. Other roadway LOS would remain the same.</p> <p>Rail traffic on CSX rail line would increase by 36 percent or less than two additional trains per day.</p> <p>Approximately one additional train per day at CR 750E at-grade rail crossing would delay traffic 6 to 7 minutes. Actuated gates and warning lights would be required at one existing at-grade crossing (CR 750E at CSX rail line).</p>	<p><b>Construction/Operations:</b> Changes to traffic signal timings may be required at the US 79/I-45 ramp intersections to accommodate changes in turning volumes at those intersections.</p> <p><b>Operations:</b> FM 39 and SH 164 would degrade from LOS B to C, which represents stable flow of traffic. Other roadway LOS would remain the same.</p> <p>Rail traffic on Burlington Northern Santa Fe line would increase up to 14 percent or less than two additional trains per day.</p> <p>No traffic delays associated with increased rail traffic are expected. No at-grade crossings would be impacted.</p>	<p><i>Minor temporary disruptions to traffic on 1 major and 47 minor roads.<sup>1</sup></i></p> <p><i>Minor temporary disruptions to traffic on 4 major and 119 minor roads.<sup>2</sup></i></p> <p><i>Sulfur removal plant and 2 booster pumps may require additional transportation corridors.<sup>3</sup></i></p> <p><b>Construction/Operations:</b> Traffic signals may be required at two key intersections on FM 1601 to accommodate changes in the turning volumes.</p> <p><b>Operations:</b> CR FM 1601 would degrade from LOS A to B, which represents reasonably free flow of traffic. Other roadway LOS would remain the same.</p> <p>Rail traffic on Union Pacific line would increase up to 11 percent or less than two additional trains per day.</p> <p>Same as Jewett.</p>

<sup>1</sup> BAFO Odessa process water pipeline construction would result in minor, temporary disruptions to traffic on 1 major and 47 minor roads.

<sup>2</sup> BAFO Odessa CO<sub>2</sub> pipeline construction would result in minor, temporary disruption to traffic on 4 major and 119 minor roads.

<sup>3</sup> BAFO Odessa CO<sub>2</sub> pipeline (Option 2) may require the construction of a new access road and additional transportation corridors for the sulfur removal plant at the FutureGen Power Plant site or another site (currently unknown) and potential access to 2 booster pumps (located on the CO<sub>2</sub> pipeline).

**Table 3-3. Summary Comparison of Impacts**

Mattoon	Tuscola	Jewett	Odessa
<b>Proposed Action – Noise and Vibration</b>			
<p><b>Construction:</b> Noise increase (above background level) at closest receptors to plant site: 2 residences: increase of up to 41 A-weighted sound measurement (dBA) (30 feet [9.1 meters] from boundary)</p> <p>Noise exceeding 3 dBA increase above background noise level (impact threshold) within 2.4 miles (3.9 kilometers) from the site boundary. Receptors affected: One school; several dozen residences</p> <p><b>Construction Traffic:</b> Noise increase above background: CH 13 south of CH 18: &lt;8 dBA CH 18 east of CH 13: &lt;5 dBA SR 121 near site: 2 dBA</p> <p><b>Startups/Restarts:</b> Noise increase at closest receptors: 2 residences: up to 21 dBA (30 feet [9 meters]) 3 residences: up to 13 dBA (&lt;1 mile [1.6 kilometers])</p> <p><b>Routine Operations:</b> Noise increase (above background level) at closest receptors to plant site: 2 residences: 6 to 9 dBA (30 feet [9.1 meters] from boundary)</p>	<p><b>Construction:</b> Noise increase (above background level) at closest receptors to plant site: 3 residences: up to 45.7 dBA (adjacent to boundary) 3 residences: up to 9.2 dBA (within 1 mile (1.6 kilometers))</p> <p>Noise exceeding 3 dBA increase (impact threshold) within 1.5 miles (2.4 kilometers) from the site boundary. Receptors affected: Numerous residences (much of downtown Tuscola)</p> <p><b>Construction Traffic:</b> Noise increase above background: CR 750E north of US 36: &lt;14.1 dBA CR 1050N west of US 45: &lt;7.2 dBA US 36 east of CR 750E: &lt;1 dBA</p> <p><b>Startups/Restarts:</b> Noise increase at closest receptors: 3 residences: up to 25 dBA (adjacent to boundary) 4 residences: up to 15 dBA (&lt;1 mile [1.6 kilometers])</p> <p><b>Routine Operations:</b> Noise increase (above background level) at closest receptors to plant site: 3 residences: up to 12 dBA (adjacent to boundary)</p>	<p><b>Construction:</b> Noise increase (above background level) at closest receptors to plant site: Chapel: &lt;15 dBA (0.25 mile [0.4 kilometer])</p> <p>Noise exceeding 3 dBA increase (impact threshold) within 1.9 miles (3.1 kilometers) from the site boundary. Receptors affected: None</p> <p><b>Construction Traffic:</b> No residence along local access route FM 39; no sensitive receptors impacted.</p> <p><b>Startups/Restarts:</b> Noise increase at closest receptors: Chapel: &lt;17 dBA (0.25 mile [0.4 kilometers])</p> <p><b>Routine Operations:</b> Noise increase (above background level) at closest receptors to plant site: No residences: &lt;3 dBA Chapel: &lt;6 dBA (0.25 mile [0.4 kilometer])</p>	<p><b>Construction:</b> Noise increase (above background level) at closest receptors to plant site: 2 residences: &lt;6 dBA (0.25 mile [0.4 kilometer])</p> <p>Noise exceeding 3 dBA increase (impact threshold) within 1.9 miles (3.1 kilometers) from the site boundary. Receptors affected: None</p> <p><b>Temporary elevated noise levels 12 churches, 5 schools<sup>1</sup></b></p> <p><b>Construction Traffic:</b> Noise increase above background: FM 1601 <b>north</b> of I-20: &lt;6 dBA Near I-20: &lt;3 dBA</p> <p><b>Startups/Restarts:</b> Noise increase at closest receptors: 2 residences: &lt;4.1 dBA (0.25 mile [0.4 kilometers])</p> <p><b>Routine Operations:</b> Noise increase (above background level) at closest receptors to plant site: 2 residences: &lt;3 dBA <b>Sulfur removal plant and 2 booster pumps<sup>2</sup></b></p>

**Table 3-3. Summary Comparison of Impacts**

Mattoon	Tuscola	Jewett	Odessa
<b>Proposed Action – Noise and Vibration (continued)</b>			
<p><b>Routine Operations (continued):</b> Noise exceeding 3 dBA threshold within 1.5 miles (2.4 kilometers) from the center of the site. Receptors affected: 12 residences <i>3 dBA is the threshold level for human hearing.</i></p> <p><b>On-Site Train Operations:</b> Noise increase at closest receptors to rail loop during unloading: 2 residences: &lt;17 dBA 3 residences: &lt;3 dBA (1 mile [1.6 kilometers])</p> <p>Potential vibration impact within Federal Transit Administration (FTA) threshold of 200 feet (61.0 meters) from rail loop: 1 residence</p> <p>Potential impact to residences within 1 mile (1.6 kilometers) from rail car shakers could generate noise levels up to 118 dBA.</p> <p><b>Operations Traffic:</b> Noise increase above background: CH 13 south of CH 18: &lt;4 dBA CH 18 east of CH 13: &lt;2 dBA SR 121 near site: &lt;1 dBA</p> <p><b>Train Traffic:</b> The frequency of occurrence of noise at current levels from passing trains would increase by 71 percent on the Peoria spur and 10 percent on the Canadian National main line (less than two additional trains per day).</p>	<p><b>Routine Operations (continued):</b> Noise exceeding 3 dBA threshold within 1 mile (1.6 kilometers) from the center of the site. Receptors affected: 7 residences <i>3 dBA is the threshold level for human hearing.</i></p> <p><b>On-Site Train Operations:</b> Noise increase at closest receptors to rail loop during unloading: 7 residences: &lt;3 dBA (1 mile [1.6 kilometers])</p> <p>Potential vibration impact within FTA threshold of 200 feet (61.0 meters) from rail loop: No residences</p> <p>Potential impact to residences within 1 mile (1.6 kilometers) from rail car shakers could generate noise levels up to 118 dBA.</p> <p><b>Operations Traffic:</b> Noise increase above background: CR 750E north of US 36: &lt;9.4 dBA CR 1050N west of US 45: &lt;4.1 dBA US 36 east of CR 750E: &lt;3 dBA</p> <p><b>Train Traffic:</b> The frequency of occurrence of noise at current levels from passing trains on the CSX rail line would increase by 24 to 36 percent (less than two additional trains per day).</p>	<p><b>On-Site Train Operations:</b> Noise increase at closest receptors to rail loop during unloading: No residences: &lt;3 dBA Chapel: &lt;3 dBA</p> <p>Potential vibration impact within FTA threshold of 200 feet (61.0 meters) from rail loop: No residences</p> <p>Potential impact to residences within 1 mile (1.6 kilometers) from rail car shakers could generate noise levels up to 118 dBA.</p> <p><b>Operations Traffic:</b> No residence along local access route FM 39; no sensitive receptors impacted.</p> <p><b>Train Traffic:</b> The frequency of occurrence of noise at current levels from passing trains on the Burlington Northern Santa Fe rail line would increase by 14 percent (less than two additional trains per day).</p>	<p><b>On-Site Train Operations:</b> Noise increase at closest receptors to rail loop during unloading: 2 residences: &lt;3 dBA</p> <p>Potential vibration impact within FTA threshold of 200 feet (61.0 meters) from rail loop: No residences</p> <p>Potential impact to residences within 1 mile (1.6 kilometers) from rail car shakers could generate noise levels up to 118 dBA.</p> <p><b>Operations Traffic:</b> Noise increase above background: FM 1601 <i>north</i> of I-20: &lt;3 dBA near I-20: &lt;1 dBA</p> <p><b>Train Traffic:</b> The frequency of occurrence of noise at current levels from passing trains would increase by 11 percent on the Union Pacific rail line (less than two additional trains per day).</p>

<sup>1</sup> BAFO construction of the Odessa process water pipeline would have temporary elevated noise levels to 12 churches and 5 schools, and the population near the pipeline construction zones, especially near the proposed process water supply.

<sup>2</sup> BAFO Odessa sulfur removal plant and 2 booster pumps (located on CO<sub>2</sub> pipeline) could potentially increase noise levels.

**Table 3-3. Summary Comparison of Impacts**

Mattoon	Tuscola	Jewett	Odessa
<b>Proposed Action – Utility Systems</b>			
<p><b>Potable Water:</b> Source: Municipal system Sufficient capacity: Yes Pipelines: 1 mile (1.6 kilometers)</p> <p><b>Process Water:</b> Source: Mattoon and possibly Charleston Wastewater Treatment<sup>1</sup> Plants Sufficient capacity: Yes 7.1 MGD (26.9 MLD) Pipelines: Possibly up to 14.3 miles<sup>2</sup> (23 kilometers)</p> <p><b>Sanitary Wastewater:</b> Source: Municipal system Sufficient capacity: Yes Pipelines: 1.25 mile (2 kilometers)</p> <p><b>Electrical Transmission:</b> Transmission Capacity - Preliminary indication that capacity exists. Further study required: Yes (Midwest Independent System Operator [MISO] Study ongoing)</p> <p>Possibility of curtailment<sup>3</sup>: Yes New or upgraded lines: 0.5 to 16 miles (0.8 to 25.7 kilometers)</p>	<p><b>Potable Water:</b> Source: Municipal system Sufficient capacity: Yes Pipelines: &lt;1 mile (&lt;1.6 kilometers)</p> <p><b>Process Water:</b> Source: Lyondell-Equistar &amp; Kaskaskia River Sufficient capacity: Yes 150 million-gallon (568 million-liter) holding pond Pipelines: 1.5 miles (2.4 kilometers)</p> <p><b>Sanitary Wastewater:</b> Source: Municipal system Sufficient capacity: Yes Pipelines: 0.9 mile (1.4 kilometers)</p> <p><b>Electrical Transmission:</b> Transmission Capacity - Preliminary indication that capacity exists. Further study required: Yes (MISO Study ongoing)</p> <p>Possibility of curtailment<sup>3</sup>: Yes New or upgraded lines: 0.5 to 17 miles (0.8 to 27.3 kilometers)</p>	<p><b>Potable Water:</b> Source: Same as process water Sufficient capacity: Yes Pipelines: Same as process water</p> <p><b>Process Water:</b> Source: Groundwater Carrizo-Wilcox Sufficient capacity: Yes 3,000 gallons (11,356 liters) per minute Pipelines: &lt;1.0 mile (&lt;1.6 kilometer)</p> <p><b>Sanitary Wastewater:</b> Source: New on-site system Sufficient capacity: Yes Pipelines: No pipeline required</p> <p><b>Electrical Transmission:</b> Transmission Capacity – Upgrade needed prior to operation. Further study required: No</p> <p>Possibility of curtailment<sup>3</sup>: Yes New or upgraded lines: 0 to 2 miles (0 to 3.2 kilometers)</p>	<p><b>Potable Water:</b> Source: Same as process water Sufficient capacity: Yes Pipelines: Same as process water</p> <p><b>Process Water:</b> Source: Groundwater Multiple aquifers; <b>combination of groundwater and surface water processed through the City of Odessa water treatment plant.</b><sup>4</sup> Sufficient capacity: Yes Based on state geologist report Pipelines: 24 to 54 miles (38.6 to 86.9 kilometers)</p> <p><b>Sanitary Wastewater:</b> Source: New on-site system Sufficient capacity: Yes Pipelines: No pipeline required</p> <p><b>Electrical Transmission:</b> Transmission Capacity – Upgrade needed prior to operation. Further study required: No</p> <p>Possibility of <b>curtailment</b><sup>3</sup>: Yes New or upgraded lines: 0.7 to 1.8 miles (1.1 to 2.9 kilometers)</p> <p><b>Sulfur removal plant and 2 booster pumps</b><sup>5</sup></p>

**Table 3-3. Summary Comparison of Impacts**

<b>Mattoon</b>	<b>Tuscola</b>	<b>Jewett</b>	<b>Odessa</b>
<b>Proposed Action – Utility Systems (continued)</b>			
<b>Natural Gas:</b> Sufficient capacity: Yes 42 million cubic feet per hour (mcf/hr) (1.3 million cubic meters per hour [mcm/hr])	<b>Natural Gas:</b> Sufficient capacity: Yes 42 mcf/hr (1.3 mcm/hr)	<b>Natural Gas:</b> Sufficient capacity: Yes 12 mcf/hr (0.3 mcm/hr)	<b>Natural Gas:</b> Sufficient capacity: Yes 12 mcf/hr (0.3 mcm/hr)
Pipelines: 0.25 mile (0.4 kilometer)	Pipelines: No pipeline required.	Pipelines: Same as Tuscola.	Pipelines: Same as Tuscola.
<b>CO<sub>2</sub> Pipeline:</b> No off-site pipeline required.	<b>CO<sub>2</sub> Pipeline:</b> New ROW: 11 miles (17.7 kilometers)	<b>CO<sub>2</sub> Pipeline:</b> New ROW: 6 to 9 miles (10 to 14 kilometers)	<b>CO<sub>2</sub> Pipeline:</b> New ROW: 2 to 16 miles (3 to 25.7 kilometers)

<sup>1</sup> **If a** larger reservoir (200 million gallons [757 million liters]) **is constructed**, then connection to the Charleston WWTP may not be necessary.

<sup>2</sup> Process water from the effluent of the municipal WWTPs of Mattoon with a 6.2-mile (10.0-kilometer) pipeline and possibly Charleston with 8.1 miles (13.0-kilometers) of pipeline, could result in up to 14.3 miles (23 kilometers) of total pipeline ROW.

<sup>3</sup> Curtailment occurs when the system controller from the Independent System Operator observes a thermal or voltage limit overload for an operating situation or, upon performing a contingency analysis, predicts a thermal or voltage limit overload for a planned project.

<sup>4</sup> **BAFO Odessa process water would come from the City of Odessa water treatment plant that uses a combination of groundwater and surface water.**

<sup>5</sup> **BAFO Odessa CO<sub>2</sub> pipelines (Option 2) would require a sulfur removal plant either at the FutureGen Power Plant site or another site (currently unknown). Use of the Comanche Creek pipeline would require 2 booster pumps.**

**Table 3-3. Summary Comparison of Impacts**

Mattoon	Tuscola	Jewett	Odessa
<b>Proposed Action – Materials and Waste Management</b>			
<p><b>Construction Materials:</b> No new sources required. Local and national suppliers well established with adequate production capacity to meet FutureGen needs:</p> <p>Concrete: 500 yd<sup>3</sup>/hr (382 m<sup>3</sup>/hr)</p> <p>Asphalt: 750 tons/hr<sup>1</sup> (680 metric tons/hr)</p> <p>Aggregate: 900,000 tpy (816,466 mtpy)</p> <p>Construction of process water reservoir would increase fill and spoils handling requirements.</p> <p><b>Construction Waste:</b> Regional landfill availability of up to 116 years – Adequate capacity.</p> <p><b>Construction Hazardous Waste:</b> Small amounts of hazardous waste generated. Resource Conservation and Recovery Act (RCRA) permit not required.</p> <p>5 hazardous waste landfills within approximately 100 to 400 miles (161 to 644 kilometers).</p> <p>&gt;14 million yd<sup>3</sup> (&gt;10 million m<sup>3</sup>) available disposal capacity at closest hazardous waste landfill site.</p>	<p><b>Construction Materials:</b> No new sources required. Local and national suppliers well established with adequate production capacity to meet FutureGen needs:</p> <p>Concrete: 330 yd<sup>3</sup>/hr (252 m<sup>3</sup>/hr)</p> <p>Asphalt: 1,900 tons/hr<sup>1</sup> (1,700 metric tons/hr)</p> <p>Aggregate: 4.4 million tpy (4 MMT per year)</p> <p><b>Construction Waste:</b> Same as Mattoon.</p> <p><b>Construction Hazardous Waste:</b> Same as Mattoon.</p> <p>Same as Mattoon.</p> <p>Same as Mattoon.</p>	<p><b>Construction Materials:</b> No new sources required. Local and national suppliers well established with adequate production capacity to meet FutureGen needs:</p> <p>Concrete: 550 yd<sup>3</sup>/hr (420 m<sup>3</sup>/hr)</p> <p>Asphalt: 8,000 tons/day<sup>1</sup> (7,257 metric tons/day)</p> <p>Aggregate: multiple suppliers, production rates not available</p> <p><b>Construction Waste:</b> Regional landfill availability of up to 132 years – Adequate capacity.</p> <p><b>Construction Hazardous Waste:</b> Same as Mattoon.</p> <p>2 hazardous waste landfills within 300 miles (483 kilometers).</p> <p>2.7 million yd<sup>3</sup> (2 million m<sup>3</sup>) available disposal capacity as closest landfill.</p>	<p><b>Construction Materials:</b> No new sources required. Local and national suppliers well established with adequate production capacity to meet FutureGen needs:</p> <p>Concrete: &gt;230 yd<sup>3</sup>/hr (&gt;176 m<sup>3</sup>/hr)</p> <p>Asphalt: &gt;2,500 tons/day<sup>1</sup> (2,268 metric tons/day)</p> <p>Aggregate: Same as Jewett.</p> <p><b>Construction Waste:</b> Regional landfill availability of up to 177 years – Adequate capacity.</p> <p><b>Construction Hazardous Waste:</b> Same as Mattoon.</p> <p>1 hazardous waste landfill within 60 miles (96.6 kilometers).</p> <p>5.0 million yd<sup>3</sup> (3.8 million m<sup>3</sup>) available disposal capacity at closest site.</p>

**Table 3-3. Summary Comparison of Impacts**

Mattoon	Tuscola	Jewett	Odessa
<b>Proposed Action – Materials and Waste Management (continued)</b>			
<p><b>Operations Materials:</b> FutureGen demand represents 3.5 percent of coal consumption by electric utilities within the state.</p> <p>Chemicals and materials required for operations are common and readily available; markets exist for sulfur, bottom slag, byproducts, and ash.</p> <p><b>Operations Waste:</b> Sanitary landfill availability same as identified for construction.</p> <p><b>Operations Hazardous Waste:</b> Hazardous waste landfill availability same as identified for construction.</p> <p><b>Potential for Spills and Releases:</b> Some risk due to on-site chemical storage requirements. Precautions would be taken to prevent and mitigate the impacts of releases of hazardous materials and waste during construction and routine operations (see Table S-12, Human Health, Safety, and Accidents for evaluations or potential ammonia spills).</p>	<p><b>Operations Materials:</b> Same as Mattoon.</p> <p>Same as Mattoon.</p> <p><b>Operations Waste:</b> Same as Mattoon.</p> <p><b>Operations Hazardous Waste:</b> Same as Mattoon.</p> <p><b>Potential for Spills and Releases:</b> Same as Mattoon.</p>	<p><b>Operations Materials:</b> FutureGen demand represents 1.9 percent of coal consumption by electric utilities within the state.</p> <p>Same as Mattoon.</p> <p><b>Operations Waste:</b> Same as Mattoon.</p> <p><b>Operations Hazardous Waste:</b> Same as Mattoon.</p> <p><b>Potential for Spills and Releases:</b> Same as Mattoon.</p>	<p><b>Operations Materials:</b> Same as Jewett.</p> <p>Same as Mattoon.<sup>2</sup></p> <p><b>Operations Waste:</b> Same as Mattoon.<sup>2</sup></p> <p><b>Operations Hazardous Waste:</b> Same as Mattoon.</p> <p><b>Potential for Spills and Releases:</b> Same as Mattoon.</p>

<sup>1</sup> Illinois reported by tons/hr and Texas by tons/day for capacity.

<sup>2</sup> *BAFO Odessa CO<sub>2</sub> pipeline (Option 2) would require a sulfur removal plant. The additional sulfur byproduct would be sold or disposed of in the same manner as the sulfur from the FutureGen Power Plant.*

**Table 3-3. Summary Comparison of Impacts**

<b>Mattoon</b>	<b>Tuscola</b>	<b>Jewett</b>	<b>Odessa</b>
<b>Proposed Action – Human Health, Safety, and Accidents</b>			
<p><b>Occupational Risks</b></p> <p><b>Construction:</b> Predicted number of annual accident cases (based on expected workforce for the entire project):</p> <p style="padding-left: 20px;">Average workforce (350) Total recordable cases = 20 Lost workday cases = 11 Fatalities = &lt;1 (0.1)</p> <p style="padding-left: 20px;">Peak workforce (700) Total recordable cases = 39 Lost workday cases = 22 Fatalities = &lt;1 (0.2)</p> <p><b>Operations:</b> Predicted number of annual accident cases (based on expected workforce of 200 for all project facilities):</p> <p style="padding-left: 20px;">Total recordable cases = 2 Lost workdays cases = 1 Fatalities = &lt;1 (0.002)</p> <p><b>Hazardous Air Emissions</b></p> <p><b>Construction:</b> No appreciable risks from hazardous air emissions to general public.</p> <p><b>Plant Operations:</b> Total Cancer Risk (vs. EPA risk criterion of <math>1 \times 10^{-6}</math>) = <math>0.084 \times 10^{-6}</math></p> <p>Total Hazard Coefficient (vs. EPA risk criterion of 1) = 0.0007</p>	<p><b>Occupational Risks</b></p> <p><b>Construction:</b> Predicted number of annual accident cases (based on expected workforce for the entire project):</p> <p style="padding-left: 20px;">Same as Mattoon.</p> <p style="padding-left: 20px;">Same as Mattoon.</p> <p><b>Operations:</b> Predicted number of annual accident cases (based on expected workforce of 200 for all project facilities):</p> <p style="padding-left: 20px;">Same as Mattoon.</p> <p><b>Hazardous Air Emissions</b></p> <p><b>Construction:</b> No appreciable risks from hazardous air emissions to general public.</p> <p><b>Plant Operations:</b> Total Cancer Risk (vs. EPA risk criterion of <math>1 \times 10^{-6}</math>) = <math>0.022 \times 10^{-6}</math></p> <p>Total Hazard Coefficient (vs. EPA risk criterion of 1) = 0.0002</p>	<p><b>Occupational Risks</b></p> <p><b>Construction:</b> Predicted number of annual accident cases (based on expected workforce for the entire project):</p> <p style="padding-left: 20px;">Same as Mattoon.</p> <p style="padding-left: 20px;">Same as Mattoon.</p> <p><b>Operations:</b> Predicted number of annual accident cases (based on expected workforce of 200 for all project facilities):</p> <p style="padding-left: 20px;">Same as Mattoon.</p> <p><b>Hazardous Air Emissions</b></p> <p><b>Construction:</b> No appreciable risks from hazardous air emissions to general public.</p> <p><b>Plant Operations:</b> Total Cancer Risk (vs. EPA risk criterion of <math>1 \times 10^{-6}</math>) = <math>0.222 \times 10^{-6}</math></p> <p>Total Hazard Coefficient (vs. EPA risk criterion of 1) = 0.0017</p>	<p><b>Occupational Risks</b></p> <p><b>Construction:</b> Predicted number of annual accident cases (based on expected workforce for the entire project) <b>except for construction risks associated with the longer CO<sub>2</sub> pipelines and the greater number of wells<sup>1</sup>:</b></p> <p style="padding-left: 20px;">Same as Mattoon.</p> <p style="padding-left: 20px;">Same as Mattoon.</p> <p><b>Operations:</b> Predicted number of annual accident cases (based on expected workforce of 200 for all project facilities):</p> <p style="padding-left: 20px;">Same as Mattoon.</p> <p><b>Hazardous Air Emissions</b></p> <p><b>Construction:</b> No appreciable risks from hazardous air emissions to general public.</p> <p><b>Plant Operations:</b> Total Cancer Risk (vs. EPA risk criterion of <math>1 \times 10^{-6}</math>) = <math>0.114 \times 10^{-6}</math></p> <p>Total Hazard Coefficient (vs. EPA risk criterion of 1) = 0.0009</p>

**Table 3-3. Summary Comparison of Impacts**

<b>Mattoon</b>	<b>Tuscola</b>	<b>Jewett</b>	<b>Odessa</b>
<b>Proposed Action – Human Health, Safety, and Accidents (continued)</b>			
<b>Unintentional Sequestration Releases</b>	<b>Unintentional Sequestration Releases</b>	<b>Unintentional Sequestration Releases</b>	<b>Unintentional Sequestration Releases</b>
<p><b>Construction:</b> Not applicable prior to operation of sequestration facilities.</p> <p><b>Pipeline Operations:</b> Number of individuals potentially impacted by release from pipeline rupture (risk rated as extremely unlikely [1 or more occurrences in 10,000 to 1 million years]):</p> <p><u>CO<sub>2</sub></u></p> <p>Adverse effect<sup>2</sup>: 0 Irreversible<sup>3</sup>: 0 Life threatening<sup>4</sup>: 0</p> <p><u>H<sub>2</sub>S</u></p> <p>Adverse effect: 0 Irreversible: 0 Life threatening: 0</p> <p>Number of individuals potentially impacted by release from pipeline puncture (risk rated as extremely unlikely [1 or more occurrences in 10,000 to 1 million years]):</p> <p><u>CO<sub>2</sub></u></p> <p>Adverse effect: 0 Life threatening: 0</p> <p><u>H<sub>2</sub>S</u></p> <p>Adverse effect: 0 Irreversible: 0 Life threatening: 0</p>	<p><b>Construction:</b> Not applicable prior to operation of sequestration facilities.</p> <p><b>Pipeline Operations:</b> Number of individuals potentially impacted by release from pipeline rupture (risk rated as unlikely [1 or more occurrences in 100 to 10,000 years]):</p> <p><u>CO<sub>2</sub></u></p> <p>Same as Mattoon.</p> <p><u>H<sub>2</sub>S</u></p> <p>Adverse effect: 7 Irreversible: ≤1 Life threatening: &lt;1</p> <p>Number of individuals potentially impacted by release from pipeline puncture (risk rated as unlikely [1 or more occurrences in greater than 1 million years]):</p> <p><u>CO<sub>2</sub></u></p> <p>Adverse effect: 0 Life threatening: 0</p> <p><u>H<sub>2</sub>S</u></p> <p>Adverse effect: 1 Irreversible: 0 Life threatening: 0</p>	<p><b>Construction:</b> Not applicable prior to operation of sequestration facilities.</p> <p><b>Pipeline Operations:</b> Number of individuals potentially impacted by release from pipeline rupture (risk rated as unlikely [1 or more occurrences in 100 to 10,000 years]):</p> <p><u>CO<sub>2</sub></u></p> <p>Same as Mattoon.</p> <p><u>H<sub>2</sub>S</u></p> <p>Adverse effect: 52 Irreversible: &lt;1 Life threatening: 1</p> <p>Number of individuals potentially impacted by release from pipeline puncture (risk rated as likely (≥1 in 100 years) to unlikely [1 occurrence per 100 to 10,000 years]):</p> <p><u>CO<sub>2</sub></u></p> <p>Same as Mattoon.</p> <p><u>H<sub>2</sub>S</u></p> <p>Adverse effect: 6 Irreversible: 0 Life threatening: 0</p>	<p><b>Construction:</b> Not applicable prior to operation of sequestration facilities.</p> <p><b>Pipeline Operations:</b> Number of individuals potentially impacted by release from pipeline rupture (risk rated as unlikely [1 or more occurrences in 100 to 10,000 years]):</p> <p><u>CO<sub>2</sub></u></p> <p>Same as Mattoon.</p> <p><u>H<sub>2</sub>S</u></p> <p>Adverse effect: 0 Irreversible: 0 Life threatening: 0</p> <p>Number of individuals potentially impacted by release from pipeline puncture (risk rated as unlikely [1 or more occurrences in 100 to 10,000 years]):</p> <p><u>CO<sub>2</sub></u></p> <p>Same as Mattoon.</p> <p><u>H<sub>2</sub>S</u></p> <p>Adverse effect: 0 Irreversible: 0 Life threatening: 0</p> <p><b>BAFO CO<sub>2</sub> pipeline Options 1 and 2: approximately same level of risk and potential impacts.<sup>5</sup></b></p>

**Table 3-3. Summary Comparison of Impacts**

Mattoon	Tuscola	Jewett	Odessa
<b>Proposed Action – Human Health, Safety, and Accidents (continued)</b>			
<p><b>Sequestration Operations:</b> Number of individuals potentially impacted by unintentional release from wellhead failure (risk rated as extremely unlikely [1 occurrence per 10,000 to 1 million years]):</p> <p><u>CO<sub>2</sub></u></p> <p>Adverse effect: 0 Irreversible: 0 Life threatening: 0</p> <p><u>H<sub>2</sub>S</u></p> <p>Adverse effect: 0 Irreversible: 0 Life threatening: 0</p> <p>Number of individuals potentially impacted by slow upward leakage of H<sub>2</sub>S from injection well (risk rated as extremely unlikely):</p> <p>Adverse effect: 1</p> <p>Number of individuals potentially impacted by slow upward leakage of H<sub>2</sub>S from other existing wells (risk rated as extremely unlikely):</p> <p>Adverse effect: 1</p>	<p><b>Sequestration Operations:</b> Number of individuals potentially impacted by unintentional release from wellhead failure (risk rated as extremely unlikely):</p> <p><u>CO<sub>2</sub></u></p> <p>Same as Mattoon.</p> <p><u>H<sub>2</sub>S</u></p> <p>Adverse effect: &lt;1 Irreversible: 0 Life threatening: 0</p> <p>Number of individuals potentially impacted by slow upward leakage of H<sub>2</sub>S from injection well (risk rated as extremely unlikely):</p> <p>Adverse effect: 6</p> <p>Number of individuals potentially impacted by slow upward leakage of H<sub>2</sub>S from other existing wells (risk rated as extremely unlikely):</p> <p>Adverse effect: 6</p>	<p><b>Sequestration Operations:</b> Number of individuals potentially impacted by unintentional release from wellhead failure (risk rated as extremely unlikely):</p> <p><u>CO<sub>2</sub></u></p> <p>Same as Mattoon.</p> <p><u>H<sub>2</sub>S</u></p> <p>Adverse effect: 4 Irreversible: 0 Life threatening: 0</p> <p>Number of individuals potentially impacted by slow upward leakage of H<sub>2</sub>S from injection well (risk rated as extremely unlikely):</p> <p>Adverse effect: 0.4-26</p> <p>Number of individuals potentially impacted by slow upward leakage of H<sub>2</sub>S from other existing wells (risk rated as extremely unlikely):</p> <p>Adverse effect: 0.4-26</p>	<p><b>Sequestration Operations:</b> Number of individuals potentially impacted by unintentional release from wellhead failure (risk rated as extremely unlikely):</p> <p><u>CO<sub>2</sub></u></p> <p>Same as Mattoon.</p> <p><u>H<sub>2</sub>S</u></p> <p>Adverse effect: 0 Irreversible: 0 Life threatening: 0</p> <p>Number of individuals potentially impacted by slow upward leakage of H<sub>2</sub>S from injection well (risk rated as extremely unlikely):</p> <p>Adverse effect: 0.3</p> <p>Number of individuals potentially impacted by slow upward leakage of H<sub>2</sub>S from other existing wells (risk rated as extremely unlikely):</p> <p>Adverse effect: 0.3</p>

**Table 3-3. Summary Comparison of Impacts**

Mattoon	Tuscola	Jewett	Odessa
<b>Proposed Action – Human Health, Safety, and Accidents (continued)</b>			
<p><b>Catastrophic Accidents/Terrorism or Sabotage</b></p> <p><b>Operations:</b> Number of individuals potentially impacted by catastrophic release at plant site<sup>5</sup> (risk of terrorism/sabotage cannot be predicted):</p> <p><u>CO</u></p> <p style="padding-left: 40px;">Irreversible: 26 Life threatening: 4</p> <p><u>SO<sub>2</sub></u></p> <p style="padding-left: 40px;">Irreversible: 19 Life threatening: 10</p> <p><u>H<sub>2</sub>S</u></p> <p style="padding-left: 40px;">Irreversible: 143 Life threatening: 4</p> <p><b>Ammonia Spills:</b> Evaluations of potential ammonia spills indicate that both workers and the general public could be affected if a leak from a tank valve, a tanker truck spill, or a tank rupture occurred.</p> <p>Estimated distance for potential adverse effect from a tanker truck release: 14,763 feet (4,500 meters)</p>	<p><b>Catastrophic Accidents/Terrorism or Sabotage</b></p> <p><b>Operations:</b> Number of individuals potentially impacted by catastrophic release at plant site<sup>5</sup> (risk of terrorism/sabotage cannot be predicted):</p> <p><u>CO</u></p> <p style="padding-left: 40px;">Irreversible: 21 Life threatening: 3</p> <p><u>SO<sub>2</sub></u></p> <p style="padding-left: 40px;">Irreversible: 15 Life threatening: 8</p> <p><u>H<sub>2</sub>S</u></p> <p style="padding-left: 40px;">Irreversible: 115 Life threatening: 3</p> <p><b>Ammonia Spills:</b> Same as Mattoon.</p> <p>Estimated distance for potential adverse effect from tanker a truck release: 14,107 feet (4,300 meters)</p>	<p><b>Catastrophic Accidents/Terrorism or Sabotage</b></p> <p><b>Operations:</b> Number of individuals potentially impacted by catastrophic release at plant site<sup>5</sup> (risk of terrorism/sabotage cannot be predicted):</p> <p><u>CO</u></p> <p style="padding-left: 40px;">Irreversible: 17 Life threatening: 2</p> <p><u>SO<sub>2</sub></u></p> <p style="padding-left: 40px;">Irreversible: 12 Life threatening: 5</p> <p><u>H<sub>2</sub>S</u></p> <p style="padding-left: 40px;">Irreversible: 92 Life threatening: 2</p> <p><b>Ammonia Spills:</b> Same as Mattoon.</p> <p>Estimated distance for potential adverse effect from a tanker truck release: 15,092 feet (4,600 meters)</p>	<p><b>Catastrophic Accidents/Terrorism or Sabotage</b></p> <p><b>Operations:</b> Number of individuals potentially impacted by catastrophic release at plant site<sup>6</sup> (risk of terrorism/sabotage cannot be predicted):</p> <p><u>CO</u></p> <p style="padding-left: 40px;">Irreversible: 2 Life threatening: 0</p> <p><u>SO<sub>2</sub></u></p> <p style="padding-left: 40px;">Irreversible: 2 Life threatening: 1</p> <p><u>H<sub>2</sub>S</u></p> <p style="padding-left: 40px;">Irreversible: 12 Life threatening: 0</p> <p><b>Sulfur removal plant: minimal additional risk<sup>7</sup></b></p> <p><b>Ammonia Spills:</b> Same as Mattoon.</p> <p>Estimated distance for potential adverse effect from a tanker truck release: 15,584 feet (4,750 meters)</p>

<sup>1</sup> **BAFO Odessa CO<sub>2</sub> pipeline (Option 1) presents 3 times greater risk than Option 2; both options present several times greater risk of construction accidents than the original proposal.**

<sup>2</sup> Adverse effects – Health effects ranging from headache or sweating to irreversible effects, including death or impaired organ function.

<sup>3</sup> Irreversible adverse effects – Health effects to include death, permanent impaired organ function and other effects that impair everyday functions.

<sup>4</sup> Life threatening effects – Subset of irreversible adverse effects that may lead to death.

<sup>5</sup> **BAFO Odessa CO<sub>2</sub> pipelines (Options 1 and 2) have the same level of risks and potential impacts as the original proposal. There would be a slight risk of an accident or event with 2 pipelines rather than just 1 pipeline in the same ROW.**

<sup>6</sup> Pipeline rupture and puncture impacts are shown in a separate category of Table S-12. None of the sites had predicted irreversible or life threatening effects to the public from CO<sub>2</sub>.

<sup>7</sup> **BAFO Odessa CO<sub>2</sub> pipeline (Option 2) could potentially have a minimal risk of accident, terrorism and sabotage from the addition of a second sulfur removal plant or a larger sulfur removal plant.**

**Table 3-3. Summary Comparison of Impacts**

Mattoon	Tuscola	Jewett	Odessa
<b>Proposed Action – Community Services</b>			
<p><b>Construction and Operations:</b> Impacts to community services during the operational phase of the proposed facilities would be minor; less than 1 percent reduction to the capacity for community services.</p> <p>No impact on healthcare. The ratio of hospital beds per thousand residents would remain at approximately <b>3.8</b>.</p> <p>During operations, school enrollment would increase by approximately 0.08 percent, which would result in minimal impacts to capacity of local public school systems.</p>	<p><b>Construction and Operations:</b> Same as Mattoon.</p> <p>No impact on health care. The ratio of hospital beds per thousand residents would remain at approximately <b>3.2</b>.</p> <p>During operations, school enrollment would increase by approximately 0.07 percent, which would result in minimal impacts to capacity of local public school systems.</p>	<p><b>Construction and Operations:</b> Same as Mattoon.</p> <p>No impact on health care. The ratio of hospital beds per thousand residents would remain at approximately 2.6.</p> <p>During operations, school enrollment would increase by approximately 0.22 percent, which would result in minimal impacts to capacity of local public school systems.</p>	<p><b>Construction and Operations:</b> Same as Mattoon.</p> <p>No impact on health care. The ratio of hospital beds per thousand residents would remain at approximately 4.5.</p> <p>During operations, school enrollment would increase by approximately 0.36 percent, which would result in minimal impacts to capacity of local public school systems.</p>

**Table 3-3. Summary Comparison of Impacts**

<b>Mattoon</b>	<b>Tuscola</b>	<b>Jewett</b>	<b>Odessa</b>
<b>Proposed Action – Socioeconomics</b>			
<p><b>Construction:</b> A potential influx of construction workers could cause a beneficial, short-term impact to housing market and could increase the hotel occupancy rate to 74 percent.</p> <p>Residences within facility viewshed that could experience adverse impact to property values:                      2 residences (adjacent to site)                      2 residences (within 0.25 mile [0.4 kilometer])                      20 residences (within 1 mile [1.6 kilometers])</p> <p><b>Tax abatements for 10 years resulting in loss of property taxes: \$10,188 per year</b></p> <p><b>Operations:</b> Permanent workers and facility operations would result in:                      Overall percent increase in population: 0.04                      Permanent jobs: 200                      Induced jobs: 240                      Percent increase workers: 0.08                      Impact to housing market:                      Percent decrease for sale: 2.2                      Percent decrease for rent: 0.4</p>	<p><b>Construction:</b> A potential influx of construction workers could cause a beneficial, short-term impact to housing market and could increase the hotel occupancy rate to 80 percent.</p> <p>Residences within facility viewshed that could experience adverse impact to property values:                      3 residences (adjacent to site)                      7 residences (within 0.5 mile [0.8 kilometer])                      Several dozen residences (beyond 1 mile [1.6 kilometers])</p> <p><b>Tax abatements for 10 years resulting in loss of property taxes: \$6,695 per year</b></p> <p><b>Operations:</b> Permanent workers and facility operations would result in:                      Overall percent increase in population: 0.04                      Same as Mattoon.</p> <p>Impact to housing market:                      Percent decrease for sale: 3.0                      Percent decrease for rent: 1.3</p>	<p><b>Construction:</b> A potential influx of construction workers could cause a beneficial, short-term impact to housing market and could increase the hotel occupancy rate to 65.6 percent.</p> <p>Residences within facility viewshed that could experience adverse impact to property values: None</p> <p><b>Tax abatements for 10 years resulting in loss of property taxes: \$5,884 per year</b></p> <p><b>Operations:</b> Permanent workers and facility operations would result in:                      Overall percent increase in population: 0.10                      Permanent jobs: 200                      Induced jobs: 113                      Percent increase workers: 0.09                      Impact to housing market:                      Percent decrease for sale: 4.5                      Percent decrease for rent: 0.8</p>	<p><b>Construction:</b> A potential influx of construction workers could cause a beneficial, short-term impact to housing market and could increase the hotel occupancy rate to 72.6 percent.</p> <p>Residences within facility viewshed that could experience adverse impact to property values: None</p> <p><b>Tax abatements for 10 years resulting in loss of property taxes: \$2,799 per year</b></p> <p><b>Operations:</b> Permanent workers and facility operations would result in:                      Overall percent increase in population: 0.20                      Permanent jobs: 200                      Induced jobs: 113                      Percent increase workers: 0.18                      Impact to housing market:                      Percent decrease for sale: 7.8                      Percent decrease for rent: 3.9</p>

**Table 3-3. Summary Comparison of Impacts**

Mattoon	Tuscola	Jewett	Odessa
<b>Proposed Action – Environmental Justice</b>			
<p><b>Construction:</b> No disproportionately high and adverse impact to minority populations. No such populations are present as defined under Executive Order (EO) 12898 within the ROI.</p> <p>Low-income populations are located within the ROI when compared to regional and national percentages; however, impacts would not be considered disproportionately high and adverse under EO 12898. Short-term job creation during construction.</p> <p><b>Operations:</b> Aesthetics, transportation, noise, and socioeconomic impacts resulting from operations were determined not to have a disproportionately high and adverse effect to minority or low-income populations.</p> <p>Long-term job creation during operation may benefit low-income populations. The potential risks to health, although unlikely, were determined to be from a slow, upward leak of H<sub>2</sub>S from an injection or existing well. A potential risk could also occur from a catastrophic accident; however, the risk of terrorism or sabotage events cannot be predicted. An ammonia spill from a tank valve, a tanker truck spill, and a tank rupture is also a potential risk. This potential would be uniform with the general population and, therefore, no disproportionately high and adverse impacts are anticipated to minority or low-income populations.</p>	<p><b>Construction:</b> Same as Mattoon.</p> <p>Same as Mattoon.</p> <p><b>Operations:</b> Same as Mattoon.</p> <p>Long-term job creation during operation may benefit low-income populations. The potential risks to health were determined to be from the unlikely event of a pipeline rupture or puncture and the extremely unlikely event of a slow, upward leakage of H<sub>2</sub>S from an injection or existing well, or a catastrophic accident; however, the risk of terrorism or sabotage events cannot be predicted. An ammonia spill from a tank valve, a tanker truck spill, and a tank rupture is also a potential risk. This potential would be uniform with the general population and, therefore, no disproportionately high and adverse impacts are anticipated to minority or low-income populations.</p>	<p><b>Construction:</b> Minority populations are interspersed within the ROI, however, impacts would not be considered disproportionately high and adverse under EO 12898.</p> <p>Same as Mattoon.</p> <p><b>Operations:</b> Noise impacts resulting from operations were determined not to have a disproportionately high and adverse effect to minority or low-income populations.</p> <p>Long-term job creation during operation may benefit low-income populations. The potential risks to health were determined to be from the unlikely event of a pipeline rupture or puncture, the extremely unlikely event of a wellhead equipment rupture, and a catastrophic accident; however, the risk of terrorism or sabotage events cannot be predicted. An ammonia spill from a tank valve, a tanker truck spill, and a tank rupture is also a potential risk. This potential would be uniform with the general population and, therefore, no disproportionately high and adverse impacts are anticipated to minority or low-income populations.</p>	<p><b>Construction:</b> Same as Jewett.</p> <p>Same as Mattoon.</p> <p><b>Operations:</b> Aesthetics and noise impacts resulting from operations were determined not to have a disproportionately high and adverse effect to minority or low-income populations.</p> <p>Long-term job creation during operation may benefit low-income populations. The potential risks to health were determined to be from a catastrophic accident; however, the risk of terrorism or sabotage events cannot be predicted. An ammonia spill from a tank valve, a tanker truck spill, and a tank rupture is also a potential risk. This potential would be uniform with the general population and, therefore, no disproportionately high and adverse impacts are anticipated to minority or low-income populations.</p>

## 3.2 INCOMPLETE AND UNAVAILABLE INFORMATION

Under the National Environmental Policy Act (NEPA), federal agencies must disclose incomplete or unavailable information, if such information is essential to a reasoned choice among alternatives, when evaluating reasonably foreseeable significant adverse impacts on the human environment in an EIS and must obtain that information if the overall costs of doing so are not exorbitant (40 CFR 1502.22). If the agency is unable to obtain the information because overall costs are exorbitant or because the means to obtain it are not known, the agency must:

- Affirmatively disclose the fact that such information is unavailable;
- Explain the relevance of the unavailable information;
- Summarize existing credible scientific evidence that is relevant to the agency's evaluation of significant adverse impacts on the human environment; and
- Evaluate the impacts based upon theoretical approaches or research methods generally accepted in the scientific community (40 CFR 1502.22).

This section discusses areas where information is unavailable or incomplete and its relevance to the range of environmental impacts. Because the FutureGen Project would be conducted to research and develop technologies related to coal gasification, power generation, and carbon capture and sequestration, the project's aim is to fill existing knowledge gaps and generate data that are currently unavailable with regard to these technologies.

Some data are unavailable or incomplete due to the high costs involved in obtaining data for all the candidate sites, such as geologic data that can only be gathered through drilling wells thousands of feet deep. Under this example, subsurface data would be collected after site selection. However, there are overall uncertainties relating to sequestration technology and the approach to conducting risk assessments for these projects. Incomplete or unavailable information relating to the area of carbon sequestration is discussed in Section 3.2.1 and incomplete or unavailable information relating to the risk assessment for the project is discussed in Section 3.2.2.

The FutureGen Project is in the initial conceptual design phase and the configuration, goals, and research plans for the project have not been finalized. Therefore, unavailable and incomplete information regarding project features as they relate to some environmental resources would only become available at a later stage of design and site characterization, as this information pertains to a more complete design. Areas where information is unavailable or incomplete related to the project design are discussed in Section 3.2.3. Areas where information is unavailable or incomplete related to site-specific conditions are discussed in Section 3.2.4.

### 3.2.1 OVERALL DATA GAPS ASSOCIATED WITH CARBON CAPTURE AND GEOLOGIC SEQUESTRATION

The concept of CO<sub>2</sub> capture and storage as a means of reducing CO<sub>2</sub> emissions is based on a combination of known technologies. The FutureGen Project's integrated gasification combined-cycle (IGCC) power plant would provide for large-scale integrated testing of pre-combustion CO<sub>2</sub> capture technologies that are still being developed. As a research project, the FutureGen Project would address a number of coal gasification and CO<sub>2</sub> capture technology gaps to advance the science of CO<sub>2</sub> capture and sequestration.

Many of the technology gaps associated with coal gasification and CO<sub>2</sub> capture are engineering problems or challenges that the FutureGen Project would attempt to solve in a way that makes these

technologies economically viable in future power plants. However, some areas related to the fate, movement, impacts, and risks associated with CO<sub>2</sub> that is injected underground are not entirely understood and may be considered scientifically controversial. A substantial body of information on the transport and storage of gases injected underground already exists and is derived from the geologic storage of natural gas, the deep injection of hazardous waste, and the injection of CO<sub>2</sub> in hydrocarbon reservoirs for enhanced oil recovery (EOR). However, several issues related to the transport and long-term geologic storage of CO<sub>2</sub> require further consideration.

The Intergovernmental Panel on Climate Change (IPCC) Special Report on Carbon Dioxide Capture and Storage (IPCC, 2005) discussed gaps in knowledge surrounding the capture of CO<sub>2</sub> and its geologic storage. The first gap identified in this report is the lack of experience with CO<sub>2</sub> capture from large coal-fueled and natural-gas-based power plants on the order of several hundred megawatts. This knowledge would be gained through implementation of the FutureGen Project. The second was the need for a better understanding of long-term storage, migration, and leakage processes of injected CO<sub>2</sub> through the implementation of more pilot and demonstration storage projects in a range of geological, geographical, and economic settings. Again, implementation of the FutureGen Project would create an opportunity to better understand these issues. The third knowledge gap is related to the legal and regulatory requirements for implementing CO<sub>2</sub> sequestration on a larger scale. While the EPA's UIC Program primarily governs the underground injection of fluids in the U.S., a standardized national framework to facilitate the implementation of geologic storage and address long-term liabilities has not yet been developed. Lastly, there is insufficient information regarding the potential contribution of CO<sub>2</sub> sequestration activities to the long-term global mitigation and stabilization of GHG concentrations.

### **3.2.2 FUTUREGEN RISK ASSESSMENT**

In addition to the knowledge gaps described above, several other knowledge gaps were identified during the development of the FutureGen Risk Assessment (Tetra Tech, 2007). The additional data gaps were related to pipeline transport, CO<sub>2</sub> storage, toxicity characterization, and risk assessment methodology. These are discussed in the following subsections.

#### **3.2.2.1 Pipeline Transport**

CO<sub>2</sub> pipelines extend over more than 1,550 miles (2,494 kilometers) in the western U.S., and carry 50 million tons (45.4 MMT) of CO<sub>2</sub> annually. For example, the Dakota Gasification Plant in North Dakota delivers more than 5,500 tons (4,990 metric tons) per day of CO<sub>2</sub> and H<sub>2</sub>S through a 200-mile (321.9-kilometer) pipeline to Weyburn, Canada, for EOR operations. In general, CO<sub>2</sub> pipelines in the U.S. operate safely with a low incidence of accidents. There were only nine reported with large volume releases [over 1,000 barrels] from 1994 to 2006, and there were no injuries or fatalities associated with any of them (OPS, 2007). However, the results of the FutureGen Risk Assessment showed that potential pipeline ruptures and leaks would represent a primary source of risk associated with operation of the FutureGen Project. Because the plant could operate for up to 50 years, it becomes more likely that at least one pipeline accident and resulting CO<sub>2</sub> leak would occur over the entire plant lifetime. To develop more accurate failure probabilities, additional information on frequencies of failure for CO<sub>2</sub> pipelines by type of failure for different-sized pipelines over a range of environmental conditions is necessary.

Defined mitigation methods for pipelines include increasing pipeline thickness, adding automatic safety shutoff valves, and monitoring various operating parameters (e.g., pressure and temperature). Models of releases must take into account the potential phase changes that can occur upon release. Therefore, a refined model to compute the mass of CO<sub>2</sub> released from a rupture or hole that incorporates the effect of decreasing pressure and temperature as a function of time over the duration of the release is needed. This refined model should also determine the percent of liquid droplets and solid phases present

as a function of enthalpy-pressure-temperature phase relationships for supercritical CO<sub>2</sub> gas and for mixed CO<sub>2</sub> and H<sub>2</sub>S gas.

### 3.2.2.2 CO<sub>2</sub> Storage

The information from analog sites presented in the FutureGen Risk Assessment provides strong evidence that CO<sub>2</sub> can be safely stored in well-characterized saline aquifer storage sites. Preliminary simulation modeling to support this inference was presented in the Environmental Information Volumes (EIVs) and the Initial Conceptual Design Report (ICDR) (FG Alliance, 2006a-d and 2007). The Alliance used available data from all sites to estimate preferential flow of CO<sub>2</sub> in different rock layers. However, due to limited data, the distribution of rock properties within the formation around the injection well and the parameters defining the hydrologic and transport properties of the formation are uncertain. The simulations, therefore, assume 100 percent radial symmetry, which is rarely encountered under actual geologic conditions. If the target formations are significantly heterogeneous in the horizontal direction – which they often are – then the plume size could be correspondingly larger in one direction and much smaller in the other. Site-specific subsurface data would be gathered after site selection to allow the models to better predict the fate and transport of the injected CO<sub>2</sub> over time. These models would be validated over time by comparing the results to monitoring data.

In addition, injected CO<sub>2</sub> is anticipated to lower the aqueous pH in the formation to values approaching 3.5, which can affect the dissolution of host minerals and cause subsequent precipitation of carbonates. However, it was assumed that the time scales for mineralization reactions to significantly affect the amount of CO<sub>2</sub> in the supercritical phase were well beyond the time periods of interest. Consequently, the simulations did not consider chemical reactions over time for each formation, and the effects of chemical reactions on the plume's size and migration is uncertain.

Overall, there is some degree of uncertainty related to undetected faults, wells, or other leakage pathways. Additional site-specific investigation and study would provide more complete data to help alleviate some of this uncertainty, and monitoring during and after the injection period would assist in identifying leakage pathways.

### 3.2.2.3 Incomplete or Unavailable Geologic Data

#### Mattoon and Tuscola

There are no site-specific data with regard to the porosity and permeability of the target Mt. Simon formation, because the nearest well that penetrates the formation is 36 miles (57.9 kilometers) from the proposed Mattoon Site and 56 miles (90.1 kilometers) from the proposed Tuscola Site. This information would be gained via test borings after site selection. ***The primary reservoir uncertainty at the Mattoon and Tuscola sites is the volume of effective porosity. This uncertainty is primarily driven by the distance of the site (36 miles [58 kilometers] and 56 miles [90 kilometers], respectively) from the nearest well with subsurface data in the Mt. Simon formation.*** Porosity and permeability are unknown because most of the data in the Mt. Simon formation is from shallower gas storage locations, and porosity and permeability usually decrease with depth, are especially below 1.5 miles (2.4 kilometers). Reduced permeability could impact injectivity; however, sensitivity analyses indicate injectivity could be 33 to 50 percent lower than expected, but still be sufficient to meet the project objectives. The Eau Claire seal, which is a mixed siltstone-shale layer, also has not been penetrated at the site, so its properties are uncertain. While the Eau Claire seal is well documented as a good seal for natural gas storage at other locations, if it has more siltstone than shale at the Mattoon or Tuscola sites, the seal is not likely to be as effective as if it is predominantly shale. The characterization of the seal is relevant to its ability to safely store the injected CO<sub>2</sub>.

## Jewett

Due to the high number of oil and gas wells in the region, a large amount of data are available with regard to subsurface characteristics near the Jewett injection site. However, there are some areas of unavailable or incomplete information, including:

- The possibility of reactivation of the existing normal faults within the plume area. However, with appropriate monitoring, fault reactivation would most likely be detected and mitigated by reducing injection pressures or moving injection to a new well.
- The number of wells penetrating the primary seal. Although a record search indicates that between eight and 57 deep wells penetrate the primary seal at one of the planned injection sites, this is an area of slight uncertainty. More importantly, the ability to locate and remediate all such wells could impact the permanence of the CO<sub>2</sub> storage. However, with thorough detection and characterization efforts at the injection site, the uncertainty regarding leakage pathways such as undocumented wells and their potential impacts, would be reduced or eliminated.

## Odessa

Due to the high number of oil and gas wells in the region, a large amount of data are available with regard to subsurface characteristics near the Odessa injection site. However, there are some areas of unavailable or incomplete information, including:

- The number of wells penetrating the primary seal. Although at least 16 deep wells penetrate the primary seal at the injection site, this is an area of slight uncertainty. The ability to locate and plug, if necessary, remediate all such wells could impact the permanence of the CO<sub>2</sub> storage. However, with thorough detection and characterization efforts at the injection site, the uncertainty regarding leakage pathways (i.e., undocumented wells) and their potential impacts would be reduced or eliminated.
- The permeability and injectivity of the Queen and Delaware Mountain sandstones. If these parameters are lower than expected, the number of injection wells would need to be increased.
- Extent or integrity of the seal. The lack of hydrocarbons may be due to the lack of a seal, either laterally between the basin slope sandstones and the carbonate platform deposits, or vertically through the Upper Queen and Seven Rivers seals. However, with thorough characterization of the seals, the uncertainty regarding leakage pathways and their potential impacts would be reduced or eliminated.

### 3.2.2.4 Reservoir Modeling

In addition to the data gaps relating to the subsurface environment at the injection sites, several global scientific uncertainties associated with CO<sub>2</sub> storage should be considered. There is a need for reliable and readily available models to simulate not only storage volume, but also the geochemical and geomechanical processes that affect long-term storage and flow of CO<sub>2</sub> and CO<sub>2</sub>-H<sub>2</sub>S mixtures. These models need to address precipitation-dissolution reactions that affect the solubility and transport of CO<sub>2</sub> in the aquifer and the storage of CO<sub>2</sub> in mineral form. Also, these models should provide reliable probabilistic predictions of leakage rates from storage sites. Estimates of the sensitivity of these predictions to model inputs and outputs are crucial to extending the understanding of long-term CO<sub>2</sub> storage.

### 3.2.2.5 Subsurface Ecosystems

The scientific community has paid little attention to the impacts of subsurface ecosystems due to geologic sequestration. Although surficial microbial ecology has been extensively researched, far less

work has been conducted to investigate deep, sub-soil microbial communities and the wider ecological interactions they may have. The overall functions of these deep microbial communities are unknown and the impacts on these ecosystems due to CO<sub>2</sub> storage are largely uncertain, but could be substantial (Johnston and Santillo, 2002). In the absence of any scientifically credible information regarding the existence, function, or value of such organisms, DOE believes that the potential for impacts is not a reason to abandon the opportunities for capture and storage of CO<sub>2</sub> - a GHG that contributes to global warming.

### **3.2.2.6 Risk Assessment Methodology**

The approach to risk analysis for CO<sub>2</sub> capture and sequestration in geologic formations is still evolving. However, a substantial amount of information exists on the assessment and management of releases and leakage associated with natural-gas storage, deep injection of hazardous waste, and the injection of either gaseous or supercritical CO<sub>2</sub> in hydrocarbon reservoirs for EOR. The FutureGen Risk Assessment relied heavily on the technical approaches and findings from these previous and ongoing projects. The risk assessment also used site-specific information and a common set of performance characteristics and hazard scenarios to provide a basis for comparing the four candidate sites selected by the Alliance.

A key contribution of the FutureGen Risk Assessment was the development and use of data for natural and engineered analogs to estimate leakage rates from the saline-aquifer storage sites. Both qualitative and quantitative analyses were conducted to evaluate risks from potential releases. A qualitative risk screening of the four candidate sites was presented based upon a systems analysis of the site features and scenarios portrayed in the conceptual site models developed for each site. Risks were qualitatively weighted and prioritized using procedures identified in a health, safety, and environmental risk screening and ranking framework for geologic CO<sub>2</sub> storage-site selection (Oldenburg, 2005). Quantitative evaluations were based on model simulations of subsurface leakage.

The FutureGen Risk Assessment applied new approaches and contributed to the advancement of risk and assessment methodologies. With the expected expansion of CO<sub>2</sub> capture and storage projects, there is a need for standardized, streamlined, and readily available tools and methodologies to conduct quantitative comprehensive assessments of risks to human health and the environment.

### **3.2.3 INCOMPLETE OR UNAVAILABLE INFORMATION RELATING TO THE FUTUREGEN PROJECT DESIGN**

Some unavailable and incomplete information regarding project features as they relate to some environmental resources would only become available at a later stage of design. Data gaps relating to the design of the FutureGen Project, and the degree to which they would influence the range of environmental impacts, are shown in Table 3-4.

**Table 3-4. Incomplete or Unavailable Information Relating to the FutureGen Project Design**

<b>Resource Area</b>	<b>Incomplete or Unavailable Information</b>	<b>Relevance to the Potential Environmental Impacts</b>
Air Quality	Maximum and steady-state air emissions	Air emissions from the FutureGen Project would be influenced to a great degree by the project's final design and components. Reasonable estimates were made based on three potential gasifiers and three example coals. Emissions (i.e., unplanned restart emission) from a number of unplanned outages (i.e., plant upset) were also estimated to account for the typical engineering hurdles encountered historically with the startup of coal gasification plants. Although there is some uncertainty related to air emissions and the project's ability to meet its target emission goals, the EIS provides a reasonable upper bound. Therefore, the range of air emissions estimated is adequate to determine the worst-case impacts of the Proposed Action.
Soils, Wetlands, and Surface Water	Site layout of facilities	The extent of impacts to soils, wetlands, and surface water on the power plant and sequestration sites would be influenced to a great degree by the site-specific layout of power plant buildings, structures, on-site utilities, roads, and rail. While the site layout would be determined after site selection, the analysis of these resources assumed a maximum disturbance footprint of up to 200 acres (81 hectares) and analyzed the impacts that would occur if wetlands and surface water features within the site could not be avoided.
Groundwater and Surface Water	Disposition of wastewater from on-site sanitary WWTPs; disposition of saline water extracted from sequestration reservoirs	Sanitary wastewater at the two Texas sites would be treated through an on-site WWTP. The disposition of the treated wastewater could include recycling it back to the power plant for process water, or releasing it to groundwater or surface water. Furthermore, saline water may be extracted from the sequestration reservoirs to alleviate formation pressures associated with CO <sub>2</sub> injection. The disposition of the treated sanitary wastewater and extracted saline water would be based on site-specific considerations. Although the analysis acknowledges all of these concerns, estimates of their impacts would be too speculative. Although BMPs and compliance with federal and state regulations provide some protection and would minimize environmental impacts, some water degradation could still occur if water was discharged back to surface water or groundwater. Therefore, the impacts to groundwater and surface water under these cases would need to be further examined in a Supplement Analysis.
Aesthetics	Degree of visual screening and architectural design	The level of visual intrusion of the power plant would be influenced to a great degree by its final design and layout. DOE considered two artistic concepts of the proposed FutureGen Power Plant to depict a range of aesthetic impacts from the project. One concept is of a typical power plant with minimal screening and architectural design, while the second concept includes extensive screening and architectural design. DOE compared and contrasted the two concepts to assess the relative level of visual intrusiveness for each.
Transportation and Traffic	Quantities of materials delivered and byproducts produced, and their method of transportation	The quantities of materials consumed and byproducts produced by the project would be influenced to a great degree by its final design and components. Reasonable estimates were made based on similar IGCC projects and the ICDR. There is some uncertainty related to material and waste quantities and the transportation methods and numbers of trips.

**Table 3-4. Incomplete or Unavailable Information Relating to the FutureGen Project Design**

<b>Resource Area</b>	<b>Incomplete or Unavailable Information</b>	<b>Relevance to the Potential Environmental Impacts</b>
Noise	Noise profiles of power plant equipment, proximity of noise sources to receptors, and types and quantities of construction equipment	The noise generated during construction and operation of the power plant would be influenced to a great degree by its final design, components, site layout, and related traffic. Reasonable estimates were made for construction equipment and operational noise sources based on similar IGCC projects. The noise analysis assumed that on-site noise sources would be located 50 feet (15.2 meters) from the site boundary and nearest receptor, which is a very conservative estimate. Therefore, the potential noise levels estimated are worst-case and more refined results are desirable.
Materials and Waste Management	Quantities of materials delivered and byproducts produced; disposition of byproducts and waste	The quantities of materials consumed and byproducts produced by the construction and operation of the project would be influenced to a great degree by its final design and components. Reasonable estimates were made based on similar IGCC projects and the ICDR. Although there is some uncertainty related to material and waste quantities, the EIS provides reasonable estimates. The disposition of byproducts and waste is unavailable and would be based on site-specific conditions.

### 3.2.4 INCOMPLETE OR UNAVAILABLE INFORMATION RELATING TO THE AFFECTED ENVIRONMENT

There is incomplete or unavailable information with regard to aspects of the affected environment. Data gaps and the degree to which they would influence the range of environmental impacts are shown in Table 3-5.

**Table 3-5. Incomplete or Unavailable Information Relating to the Affected Environment**

<b>Resource Area</b>	<b>Incomplete or Unavailable Information</b>	<b>Relevance to the Potential Environmental Impacts</b>
Geology	Site-specific geologic data at the sequestration sites	Unavailable or incomplete information relating to geology at the sites and its bearing on geologic sequestration and the FutureGen Risk Assessment analysis are provided in Section 3.2.2.3.
Surface Water	Current and future water levels in streams receiving effluent near the Mattoon and Tuscola sites	The Mattoon Site would receive its process water from the effluent of municipal sanitary WWTPs in Mattoon and, possibly Charleston. The Tuscola Site would receive its process water from the Kaskaskia River. By diverting this water away from associated streams, surface water levels could drop locally. DOE reviewed reports from U.S. Geological Survey, EPA, and the Illinois Environmental Protection Agency (IEPA) to assess the potential impacts of the proposed FutureGen Project on surface water resources. Although site-specific data were not available, data from area discharge points and sample locations monitored by the agencies previously mentioned were evaluated. Best professional judgment was applied to determine the likelihood of surface water impairments in the area. Therefore, the estimated flow changes to surface waters are adequate to determine the impacts of the Proposed Action.

**Table 3-5. Incomplete or Unavailable Information Relating to the Affected Environment**

Resource Area	Incomplete or Unavailable Information	Relevance to the Potential Environmental Impacts
Transportation and Traffic	Data on LOS at road intersections and traffic accident data	Information is not available with respect to turning movements and LOS at all intersections within the ROIs for the sites. However, DOE identified key intersections and estimated the LOS qualitatively based on the relative volumes of traffic on the intersecting roadways. No general methods are available for estimating the increase in traffic accidents due to increased roadway volume because there are too many variables that influence accidents. Consequently, DOE assessed potential traffic safety impacts in a qualitative way based on predicted changes to LOS.
Utilities	Interconnection voltage and transmission line corridors	Although interconnection feasibility studies are underway for the alternative sites, these studies have not been completed. DOE evaluated different options (138 kV and 345 kV) for delivering power from the FutureGen Project to the local transmission grid. The method for evaluating impacts assumed that either option could be used and examined the impacts associated with their transmission corridors.

### 3.3 POTENTIAL CUMULATIVE IMPACTS

This section describes potential cumulative impacts (40 CFR 1508.7) that may result from the FutureGen Project when combined with the impacts of other relevant past, ongoing, and reasonably foreseeable future actions near the candidate sites. The Council on Environmental Quality (CEQ) regulations implementing NEPA require the consideration of cumulative impacts as part of the EIS process. DOE considers a reasonably foreseeable action to be a future action for which there is a realistic expectation that the action could occur. These include, but are not limited to: actions under analysis by a regulatory agency, proposals being considered by a state or local planning organization, a project that has commenced, or a future action that has obligated funding.

Actions or activities relevant to the FutureGen Project are those related to power generation, coal production, geologic sequestration, transportation, air emissions (associated with large quantity generators), and statewide initiatives related to these areas. The existing environment with respect to oil and coalbed methane resources is also discussed in terms of potential recovery through CO<sub>2</sub> sequestration.

Potential cumulative impacts are discussed primarily on a qualitative basis, but their aspects are estimated and quantified where sufficient data are available. For projects in an early planning stage, many environmental and socioeconomic parameters are unknown, such as air emissions, water use, land disturbance, traffic generated, waste streams, and job creation. However, in some cases, scaling based on similar projects provides reasonable estimates. For example, DOE determined that scaling air emissions, water use, and rail shipments from similar permitted projects may be a reasonable approach to estimate and quantify potential impacts. However, for other site-specific aspects, like land disturbance and impacts to cultural or biological resources, scaling from other projects would be too speculative. These are either discussed qualitatively or not addressed due to their high level of uncertainty.

Section 3.3.1 addresses the cumulative impacts associated with FutureGen Project technology and alternative operating scenarios. Section 3.3.2 presents information on relevant past and ongoing activities. Section 3.3.3 discusses reasonably foreseeable actions within 50 miles (80.5 kilometers) of each alternative power plant site and their cumulative impacts with the FutureGen Project.

### 3.3.1 CUMULATIVE IMPACTS OF FUTUREGEN TECHNOLOGY

#### 3.3.1.1 Potential Alternative Operating Scenarios under FutureGen

The FutureGen Project would be a research and development project with the purpose of testing advanced coal gasification, power generation, and geologic sequestration technologies. After the DOE-sponsored phase of the project, the Alliance would have more flexibility in both the types of research projects conducted at the plant and the operating features of the plant. It is reasonably foreseeable that, over time, the Alliance or its successor would alter key aspects of plant operation based on economic factors. For example, to lower operating costs, the Alliance could choose to co-sequester H<sub>2</sub>S with the CO<sub>2</sub> gas, thus eliminating the cost of operating the Claus process. Implementation of a full co-sequestration option may require pipeline upgrades or potential additional monitoring procedures.

The Alliance or its successor may also choose to sell the CO<sub>2</sub> for use in EOR. Although it is not a required aspect of the candidate sites, the potential to use CO<sub>2</sub> for EOR may be considered a “best value” aspect. The ability to transport and sell all or a portion of the CO<sub>2</sub> could offset operating expenses of the FutureGen Power Plant. Oil fields are within 50 miles (80.5 kilometers) of all four candidate sites. The most likely scenario for using the FutureGen CO<sub>2</sub> for EOR would be for the Alliance to negotiate an agreement with an existing commercial oil field operator or pipeline company. Under such an agreement, the Alliance would sell the CO<sub>2</sub>, while construction and operation of the pipeline and the injection site would be the responsibility of their commercial partner.

A commercial CO<sub>2</sub> pipeline exists near the proposed Odessa Site and would most likely be the method of transport of the CO<sub>2</sub> to local oil fields. At the other candidate sites, a new pipeline route (in addition to that planned for the saline formation injection site) would be required to reach local oil fields. The length and route of any new pipeline would depend on the site chosen to receive the CO<sub>2</sub>.

The use of CO<sub>2</sub> from the proposed FutureGen Power Plant at existing oil fields could extend the operating life of those fields, allowing for greater volumes of oil to be extracted. A small fraction of the CO<sub>2</sub> would mix with the recovered oil that would be removed in the processing stage. However, because of the economic value of the CO<sub>2</sub>, it would probably be recovered and re-injected at the EOR site. Extending the life of nearly-depleted oil fields could create or prolong existing jobs at these fields and provide additional oil and gasoline for consumers. Impacts associated with using the CO<sub>2</sub> for EOR could potentially include, but would not be limited to:

- Developing ROWs for new CO<sub>2</sub> pipelines that could cause changes in land use and ownership, land clearing and soil disturbance, utility and road crossings, wetland disturbance, habitat disturbance, and potential surface leaks of CO<sub>2</sub>.
- Constructing new CO<sub>2</sub> injection sites that require the permitting and drilling of new UIC wells; land clearing and soil disturbance for installing wells, pumps, distribution piping, access roads, and utility lines; *and* sealing or mitigation of abandoned wells.
- *Potential surface leaks of sequestered CO<sub>2</sub>; potential vertical or lateral migration of CO<sub>2</sub> in the subsurface that could cause changes in soil gas concentrations, cause chemical changes or mineralization, impact groundwater supplies, or mobilize heavy metals.*
- *Prolonging oil recovery operations at the site.*
- *Providing the economic benefits of additional oil recovery.*

The amount of oil recovered would vary based on site-specific conditions. However, a nominal estimate would be three barrels of incremental oil produced per metric ton of CO<sub>2</sub> injected (EU DG JRC, 2005). During the DOE-sponsored phase, up to 1.7 million tons (1.5 MMT) per year of CO<sub>2</sub> from the

FutureGen Project could be used for EOR. Over this four-year period, this could result in the additional recovery of up to 18 million barrels of oil. The excess CO<sub>2</sub> could also be used for enhanced coalbed methane (ECBM) recovery. Descriptions of potential areas for EOR and ECBM relative to the candidate sites are provided in Section 3.3.2.

Based on local markets for hydrogen gas, the Alliance may choose to sell a portion of the hydrogen gas stream as a commercial commodity in the future. This process may include transporting it off site or providing a fill station at the plant site.

### 3.3.1.2 Advancement of Near-Zero Emissions Power Plants

#### General Technology Advancement

*The FutureGen Project would be developed to provide the research needed to foster new FutureGen-like power plants (to reduce GHG emissions) by the private sector. It is reasonably foreseeable that the lessons learned from the FutureGen Project would enable both DOE and private companies to invest further in similar power plants, which may replace traditional coal-fueled power plants as they near the end of their economic lifespan and/or be built to satisfy growing electricity demand.*

*It is important to note that other countries are also pursuing FutureGen-like power plants that could lead to more of these types of reduced GHG emissions power plants in the future. For example, similar power plants are currently under development in Australia, Norway, and China. Australia is planning a 100-megawatt (MW) IGCC power plant called ZeroGen that would also sequester CO<sub>2</sub> in deep saline aquifers (ZeroGen, 2006). Initial planning scheduled the start of construction during mid-2008 with startup planned for 2011. The Norwegian Magnum project would be a 400-MW coal-fueled IGCC plant. The plant would capture 2.6 million tons (2.4 MMT) of CO<sub>2</sub> per year, which could then be piped or shipped to offshore oil or gas fields where it could be sequestered deep below the seabed. Proponents have indicated that a bid for delivering the plant could be ready in 2007, approvals received in 2008, and production could start in 2011 (CNN, 2006). China is planning a project called GreenGen. GreenGen would ultimately consist of a 300- to 400-MW coal gasification power plant that would sequester its CO<sub>2</sub>. China would construct and begin operating GreenGen between 2010 and 2014, and complete its demonstration phase by 2020 (TPRI, 2006).*

*Another U.S. project planned with IGCC and sequestration characteristics similar to the FutureGen Project is the Carson Hydrogen Power Project in California. This project would convert petroleum coke byproducts from the existing British Petroleum Carson Refinery into hydrogen gas and burn the hydrogen to produce electricity. Most of the CO<sub>2</sub> would be sequestered into rock formations deep underground (Daily Breeze, 2006).*

*However, recent escalation in material, engineering, and construction costs have resulted in higher development costs, and many proposed projects have already been significantly delayed or cancelled.*

*Cumulatively, FutureGen and other successful projects would advance the future commercialization potential of coal gasification power plants integrated with carbon capture and geologic sequestration. While FutureGen, itself, would not achieve the goal of “near zero emissions” to the air, future power plants could meet this goal. Although it is impossible to predict the rate of future commercialization, the advancement of near zero-emissions power plants could have a beneficial cumulative impact by reducing GHG emissions related to coal-fueled energy production. Furthermore, carbon capture and geological sequestration could also be applied to other types of fossil-fueled power generating and industrial facilities.*

## Greenhouse Gas Emissions and Sequestration

*Six gases—carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF<sub>6</sub>)—have been identified as the primary contributors to the greenhouse effect. Three gases (CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O) comprise 98 percent of greenhouse gas emissions (EIA, 2004), and CO<sub>2</sub> far surpasses other GHGs both in quantity emitted and in its relative contribution to climate change effects. Thus, CO<sub>2</sub> is the primary focus of mitigation efforts for greenhouse gas emissions (see generally DOE, 2007b). Water vapor also contributes to the greenhouse effect, although water vapor is not the primary focus of current mitigation efforts.*

*It has been estimated that CO<sub>2</sub> concentrations in the atmosphere have increased by 31 percent since 1750 (IPCC, 2001) and by 19 percent from 1959 to 2003 (Keeling and Whorf, 2005). Fossil fuel combustion is the primary contributor to increasing concentrations of CO<sub>2</sub> in the atmosphere (IPCC, 2007). Although CO<sub>2</sub> is not currently regulated as an air pollutant at the Federal level, it is generally regarded by a large body of scientific experts as contributing to global warming and climate change (IPCC, 2007). The EPA and state regulatory agencies are considering CO<sub>2</sub> regulations that could be promulgated in the near future.*

### Project Emissions

*Annual CO<sub>2</sub> emissions from FutureGen are estimated to be approximately 0.28 million tons (0.25 MMT) per year of full time operation, assuming a 90 percent CO<sub>2</sub> capture and sequestration rate is achieved. Over the DOE-sponsored period, it is estimated that a total of 1.1 million tons (1.0 MMT) of CO<sub>2</sub> would be emitted from the facility. If carbon capture and permanent sequestration continues over a 50-year life span, the project could emit 14 million tons (12.7 MMT) of CO<sub>2</sub>.*

*For comparison, predicted annual CO<sub>2</sub> emission rates from FutureGen are much smaller than the 2003 aggregate (all sources) annual CO<sub>2</sub> emissions of 253 million tons (230 MMT) in Illinois, 739 million tons (670 MMT) in Texas, and 6,410 million tons (5,815 MMT) in the entire continental U.S. Annual CO<sub>2</sub> emission rates from FutureGen represent an incremental increase from current estimated annual CO<sub>2</sub> emissions of approximately 0.1 0.04 and 0.004 percent, respectively, for these geographic areas.*

*In terms of mass emission rate of CO<sub>2</sub> per megawatt of power output (lbs/MWh), the FutureGen project plant is predicted to emit between 114 lb/MWh to 244 lb/MWh as an annual average, including start-up and upset events. Compared to the steady-state emissions of other fossil technologies, FutureGen would emit substantially less CO<sub>2</sub> than a state-of-the art non-capture plant (e.g., bituminous coal fueled IGCC = 1,714 lb/MWh, bituminous coal fueled supercritical pulverized coal power plant = 1,773 lb/MWh, or natural gas fueled combined cycle power plant = 797 lb/MWh [see DOE, 2007c]).*

*While emitting much less CO<sub>2</sub> per megawatt-hour of electricity compared to conventional coal-fueled power plants, FutureGen would still contribute to atmospheric concentrations of CO<sub>2</sub>. Global emissions of CO<sub>2</sub> resulting from fossil fuel combustion has been estimated to be 28 billion tons (25 billion metric tons) in the year 2003 (Marland, et al. 2006) and more than 33 billion tons (30 billion metric tons) in 2006 (DOE, 2007a). To realize a net reduction in CO<sub>2</sub> emissions, FutureGen would have to offset an equivalent amount of electricity generating capacity from one or more unmitigated power plants. With or without offsets, FutureGen's individual contribution to global CO<sub>2</sub> emissions and potential climate change is extremely small.*

*After the DOE-sponsored project period ends, the power plant could be operated without carbon capture and sequestration. If this occurs, the total production of CO<sub>2</sub> would be emitted to the atmosphere. In the event of upsets in the carbon capture and sequestration components of the facility, all of the generated CO<sub>2</sub> may likewise be emitted to the atmosphere. Upsets are likely to occur, but the duration of these events should be short (hours or days).*

## **Project Sequestration**

*The power plant is being designed to capture at least 90 percent of its CO<sub>2</sub>. During the project period, FutureGen would capture and sequester between 1.1 and 2.8 million tons (1.0 and 2.5 MMT) per year of CO<sub>2</sub> in a deep saline formation. Over the four-year DOE-sponsored period, between 4.4 and 11.2 million tons (4.0 and 10.2 MMT) of CO<sub>2</sub> would be stored in a deep saline formation, with the opportunity to sequester more if the plant operations and sequestration field provide such an opportunity. Site selection criteria have required injectivity for 55 million tons (50 MMT) of CO<sub>2</sub> over the life of the project, with the possibility of sequestering much more although possibly in other nearby formations or at new injection well locations. Conceivably, FutureGen facilities could sequester up to 140 million tons (125 MMT) over a 50-year lifespan.*

*For comparison of the injection rates (tons per year), there is currently no geologic sequestration of CO<sub>2</sub> occurring in Illinois, other than small research experiments. The Permian Basin in western Texas and eastern New Mexico currently inject 30 million tons (27 million metric tons) per year into petroleum reservoirs for enhanced oil recovery (DOE, 2007a).*

*Geologic sequestration, either in saline reservoirs and/or in enhanced oil recovery projects, would likely continue after the project period ends. For comparison to the storage capacity (in tons), potential CO<sub>2</sub> storage capacity in the Illinois Basin has been estimated (DOE, 2007a) as 154 to 485 million tons (140 to 440 MMT) in oil and gas reservoirs, 2.5 to 3.6 billion tons (2.3 to 3.3 billion metric tons) in unminable coal seams, and 32 to 127 billion tons (29 to 115 billion metric tons) in the saline reservoirs of the St. Peter Sandstone and the Mt. Simon Sandstone. Eastern Texas has reported (DOE, 2007a) 4.4 billion tons (4.0 billion metric tons) of potential CO<sub>2</sub> storage capacity in oil and gas reservoirs plus tens of billions of tons of storage capacity in a combination of coal seams, gas-bearing shale, and saline formations. Western Texas has reported (DOE, 2007a) 13 billion tons (12 billion metric tons) of capacity in saline formations alone. At any of the sites, the CO<sub>2</sub> injected by FutureGen would occupy much less than 1 percent of the storage capacity in the host state (assuming a total of up to 55 million tons (50 MMT) would be injected).*

*If the excess CO<sub>2</sub> captured (that portion above the 1.1 million tons (1.0 MMT) of CO<sub>2</sub> that must be stored per year during the project period) is sold for enhanced oil recovery or enhanced gas recovery, there could be an added revenue stream for the project, increased production from the oil or gas fields, increased jobs, and other benefits. The negative side is that produced oil or natural gas would lead to a release of greenhouse gases as these commodities are combusted. However, without additional domestic production from enhanced oil or natural gas recovery projects, imports would be consumed instead, resulting in the same levels of CO<sub>2</sub> emissions.*

## **Project Technology Deployment: Immediate Impact on Electric Power Industry**

### **No Action Alternative**

*If the FutureGen Project is not funded (i.e., the No Action Alternative), a significant delay is foreseeable in the development and deployment of IGCC power generation systems that are fully integrated with carbon capture and storage. Private industry may voluntarily take on projects that*

*include IGCC with carbon capture and sequestration but only if suitable financial incentives exist (e.g., enhanced oil recovery, enhanced gas recovery, or enhanced coal-bed methane recovery), and there would be little chance that projects would be developed that inject CO<sub>2</sub> into deep saline formations. Given the geographic distribution and storage potential of saline reservoirs (both domestic and international), this particular type of storage formation is of high importance for widespread deployment of geologic sequestration, especially in regions that do not have extensive oil, natural gas, or coal deposits.*

*It is possible that other FutureGen-like projects will be initiated by other countries (e.g., Magnum Project in the Netherlands, ZeroGen in Australia). Even if other projects go forward, the ability to deploy these technologies within the U.S. may be significantly delayed without considerable involvement of U.S. industrial participants, allowing these participants to gain experience. Finally, FutureGen is a major component of the U.S.'s current technology-based strategy to limit climate change, and a failure to fund FutureGen may have significant domestic and international political implications. Such implications include an increased domestic reliance on less plentiful, higher priced fuels such as natural gas, an increased economic burden resulting from such reliance, as well as a continued deployment of environmentally less preferable alternatives (e.g., conventional power plants without carbon capture and sequestration), especially in rapidly developing economies such as India and China.*

*If the No Action Alternative is chosen and the project is not built and operated, there would be no contribution to atmospheric greenhouse gas concentrations from this project. However, if a conventional power plant is built to provide the electricity that would have been produced by FutureGen, that power plant would emit to the atmosphere around 3 million tons (2.7 MMT) of CO<sub>2</sub> per year. If a delay occurs in the deployment of carbon capture and sequestration technologies within the electric power industry, greater amounts of CO<sub>2</sub> would be emitted to the atmosphere than would occur if the technology is deployed rapidly. The same could occur for other industries that might benefit from the research, development and demonstration that FutureGen would offer.*

### **Proposed Action**

*If the FutureGen Project is funded, there would be a series of potential economic, environmental, and political benefits, many of which overlap. Potential benefits include:*

*Economic – Successful operation of FutureGen would provide an engineering design and cost basis for future electric generating plants that emit minimal criteria pollutants, CO<sub>2</sub>, and mercury. This design and cost basis would yield multiple economic benefits to the entire domestic economy by:*

- establishing the engineering, cost and operating knowledge necessary to encourage the adoption and further deployment of similar systems by private industry;*
- providing operating experience such that IGCC with carbon capture and sequestration will be considered established technologies and not the “high cost, high risk” ventures they are considered to be today;*
- producing the necessary information to policy-makers and regulators so that technically sound regulations can be developed and much needed new generation capacity can be developed with regulatory certainty;*
- creating a research and development platform that will substantially accelerate the demonstration and deployment of new technologies; and*
- allowing continued use of price-stable, domestically plentiful coal in a more environmentally friendly manner.*

*Environmental – In a similar manner, the successful operation of FutureGen would provide multiple environmental benefits by:*

- *proving a means to produce electricity from coal while emitting to the air much smaller quantities of criteria pollutants, CO<sub>2</sub> and mercury, compared to conventional power plants;*
- *establishing the design basis to enable accelerated deployment of carbon capture and sequestration technologies as a carbon management tool;*
- *accelerating the replacement and/or retrofitting of older, less efficient and less environmentally preferable electricity generating plants;*
- *providing much needed data to accelerate the development, permitting and construction of environmentally preferable electricity generating facilities;*
- *demonstrating a means to reduce the trend of increasing emissions of CO<sub>2</sub>; and*
- *sharing these technology options with coal rich, energy intensive economies (e.g., India and China) through international involvement.*

*Policy – the successful operation of FutureGen would generate a number of national and international benefits by:*

- *demonstrating U.S. leadership in geologic sequestration;*
- *establishing a necessary design basis to advance the Nation's technology-based climate policy;*
- *showing one environmentally preferable option for further utilization of coal, both domestically and internationally; and*
- *providing necessary information to facilitate international cooperation on climate related policy.*

## **Future Propagation of Capture and Geologic Sequestration Technology**

### **Power Plant Design and Efficiency**

*Power plants that capture and sequester CO<sub>2</sub> with high efficiency must be designed and built specifically to do so. Until such a design is proven by successful construction and operation, the conservative and risk averse electric power industry is likely to resist regulatory programs that would curb emissions. The DOE Energy Information Administration indicates in their reference case that nearly 292 GW of new electricity generating capacity will be constructed through 2030. Approximately 90 percent of that new domestic capacity is anticipated to use fossil fuels and none would be equipped with carbon capture and sequestration. While the technologies tested at FutureGen may not directly address all new capacity additions or the existing coal-based fleet of approximately 300 GW, the knowledge and experience that would result from the CO<sub>2</sub> sequestration component (transport, injection and monitoring) of FutureGen would be directly transferable when post-combustion CO<sub>2</sub> capture technologies become practical.*

*One disadvantage of FutureGen's approach to carbon management is that the power plant must divert a sizable fraction of the total electricity production to operating the carbon capture and sequestration facilities. The result is that FutureGen would realize a net electricity production rate that would be comparable to that of many older, less efficient power plants. This means that more coal must be consumed to generate the same amount of electricity as the plant would produce without carbon capture and sequestration. Research and development work at the FutureGen facility would aim to reduce this penalty in energy conversion efficiency. In the longer term, much more efficient power plants will be needed to reduce the rate at which coal supplies (and other fossil fuels) are depleted.*

## **Pipelines**

*If carbon capture and sequestration is widely deployed at power plants across the Nation, pipelines must be constructed to transport the CO<sub>2</sub> to sequestration sites. The extent of new pipelines would depend on the extent to which new power plants were located near or adjacent to saline aquifers or other sequestration targets. Typical pipeline construction and operational impacts would be associated with this component of a widespread deployment across the U.S. As stated in Section 3.3.1.1, an increase in the number of CO<sub>2</sub> pipelines nationally could result in the development of new rights-of-way that could cause changes in land use and ownership, land clearing and soil disturbance, utility and road crossings, wetland disturbance, habitat disturbance, and potential surface leaks of CO<sub>2</sub>.*

## **Greenhouse Gas Emissions**

*While many variables would influence the deployment of FutureGen-like technologies, deployment is likely to be restricted to local opportunities based on economic feasibility, unless a regulatory program is established to compel carbon capture and sequestration. Further delay in the establishment of such a legal/regulatory requirement means that power plants would continue to be built without carbon capture and sequestration. With further delay, the rate of CO<sub>2</sub> emissions will likely continue to increase. With further delay, the concentration of CO<sub>2</sub> in the atmosphere will likely continue to grow, and the potential for global climate change will increase.*

## **Geologic Sequestration**

*Geologic sequestration of CO<sub>2</sub> is a promising technology that is being actively investigated and tested nationally and internationally by DOE and other organizations (Davison et al., 2001; IPCC, 2005). Unlike commercial projects associated with natural resource (oil and natural gas) extraction efforts, most of the research projects are at a pilot scale or smaller. FutureGen offers an opportunity to conduct research at a larger scale, while also accelerating the widespread deployment of geologic sequestration across the electric power industry. Initial reviews (DOE, 2007a, b) of the geologic storage potential suggest that there is ample pore space in deep sedimentary rock layers to contain the CO<sub>2</sub> emitted by power plants and other industries. Concerns about the safety and permanence of the storage can best be addressed through carefully gained experience. An environmental concern is that injected CO<sub>2</sub> would displace native fluids (mostly salt water) that would migrate to the near surface or surface environment where it would mix with fresh water, making it unfit for its current uses. As geologic sequestration is widely deployed, such displacement of native fluids would occur with a potential for contamination of fresh water supplies, streams, rivers, or lakes. Mitigation techniques should be developed to help correct these situations, and DOE is funding research in relevant areas.*

## **Enhanced Oil Recovery, Enhanced Coal Bed Methane Recovery, and Enhanced Natural Gas Recovery**

*Generally, a volume of CO<sub>2</sub> (at reservoir temperature and pressure) equal to the volume of previously produced oil or natural gas (also at reservoir temperature and pressure) can be injected into depleted reservoirs without displacing native fluids to the land surface. Injections of CO<sub>2</sub> can also be used to help recover more oil or natural gas. Oil and natural gas recovered by these techniques would then be combusted in engines, combustion turbines, steam boilers, space heaters, fuel cells, etc. with the result that the carbon in these fuels would, in most cases, be released to the atmosphere in the form of CO<sub>2</sub>. This CO<sub>2</sub> would offset some of the benefit from the capture and geologic sequestration of CO<sub>2</sub> generated from the power plant. However, the process does result in a net benefit compared to a situation where no CO<sub>2</sub> is captured and stored, but the oil and natural gas are produced by other means.*

### 3.3.1.3 Summary of the Cumulative Impacts of FutureGen Technology

*Collectively, the research, development, and operational experience gained through the FutureGen Project, other current and planned coal gasification plants, and other geologic sequestration projects could foster increasing numbers of new IGCC power plants with sequestration components. Furthermore, such experience could also lead to the retro-fitting of existing power plants with carbon capture and sequestration components. The resulting potential reduction in anthropogenic GHG emissions that may otherwise be emitted by traditional coal-fueled power plants would be a beneficial cumulative impact.*

*The ability to effectively and economically capture CO<sub>2</sub> emissions from existing power plants could also cause the construction of new CO<sub>2</sub> pipelines across the country. Such pipelines would connect power plants and other CO<sub>2</sub> sources to geologic formations suitable for sequestration. In the near term, it is likely that the most economical geologic sequestration projects would support EOR or ECBM operations. However, if CO<sub>2</sub> becomes a regulated air pollutant in the U.S. or carbon is otherwise taxed in some way, geological sequestration in deep saline aquifers (which are generally more geographically dispersed throughout the U.S. than oil and gas reservoirs) may become more widely implemented.*

*Since coal is anticipated to continue in its major role for world electricity generation in the near future, implementation of carbon capture and storage technologies will be a critical component to any CO<sub>2</sub> reduction strategy (MIT, 2007; NRDC, 2007). The FutureGen Project may be the first opportunity to integrate and demonstrate at an appropriate scale the technologies needed to allow for wide-spread implementation of integrated coal gasification, carbon capture, and geological sequestration in the near-future. The integration and implementation of these technologies offers one major option for the development of a broad-based strategy to address GHG emissions reduction and potential global warming impacts.*

### 3.3.2 RELEVANT PAST AND ONGOING ACTIVITIES

This section describes the past and ongoing activities and plans implemented at the state or local level that are relevant to aspects of the FutureGen Project.

#### 3.3.2.1 Relevant Past and Ongoing Activities in Illinois

The Illinois coal industry began to decline in the 1990s after the federal government established stricter sulfur emission standards. However, a resurgence in the coal industry resulted from advances in clean-coal technology that made it possible to use Illinois coal and still meet the strictest air quality standards in the nation (State of Illinois, 2006). In July 2003, the Governor of Illinois signed a law that added \$300 million in general obligation bonds to the Coal Revival Initiative (Illinois Resource Development and Energy Security Act, P.A. 92-12), which provides major tax and financing incentives to large, clean, coal-fueled projects. Since then, the state has invested \$64.7 million in coal development projects, including the Peabody Energy Electric Prairie State project in Washington County and the Taylorville Energy Center coal gasification project in Christian County. Also included is more than \$45 million in grants to Illinois coal operators who upgrade their facilities to make their product more competitive, as well as more than \$11 million for advanced research through the Illinois Clean Coal Institute. In addition, three new coal mines were announced in April 2006, although none are currently planned within 50 miles (80.5 kilometers) of either the Mattoon or Tuscola candidate sites.

The existing oil production industry in Illinois could provide an opportunity for EOR. During the 2004 reporting period, at least 3,700 oil wells across 48 individual oil fields produced 649,000 barrels of

oil within 50 miles (80.5 kilometers) of Mattoon or Tuscola. In Mattoon, 212 oil wells at two fields produced over 39,000 barrels of oil in 2004 (ISGS, 2004). These statistics do not include inactive oil fields (as of 2004). There are also good opportunities for ECBM recovery throughout the region. Figure 3-1 depicts oil wells and coalbed methane areas within a 50-mile (80.5-kilometer) radius of both Mattoon and Tuscola.

In November 2006, the Governor of Illinois announced an initiative to build a 140-mile (225.3-kilometer) CO<sub>2</sub> pipeline that would stretch from coal gasification plants planned for central and southern Illinois to the Illinois Basin oil field in southeastern Illinois. The pipeline supports Illinois' Climate Change Initiative, which included an EO that created the Illinois Climate Change Advisory Group. The Group will consider a full range of policies and strategies to reduce GHG emissions in Illinois. The pipeline also would reduce Illinois' dependence on foreign oil, a key part of the Governor's Energy Independence Plan released in early 2006 (IGNN, 2006a).

In November 2006, Illinois adopted a Hg-reduction regulatory plan that will reduce emissions from coal-fueled power plants. Under the new rules, these power plants would be required to install modern pollution control equipment designed to reduce Hg pollution by 90 percent or more by June 30, 2009. While achieving the Hg standard, the utilities will also significantly reduce emissions of SO<sub>2</sub> and NO<sub>x</sub> (IGNN, 2006b).

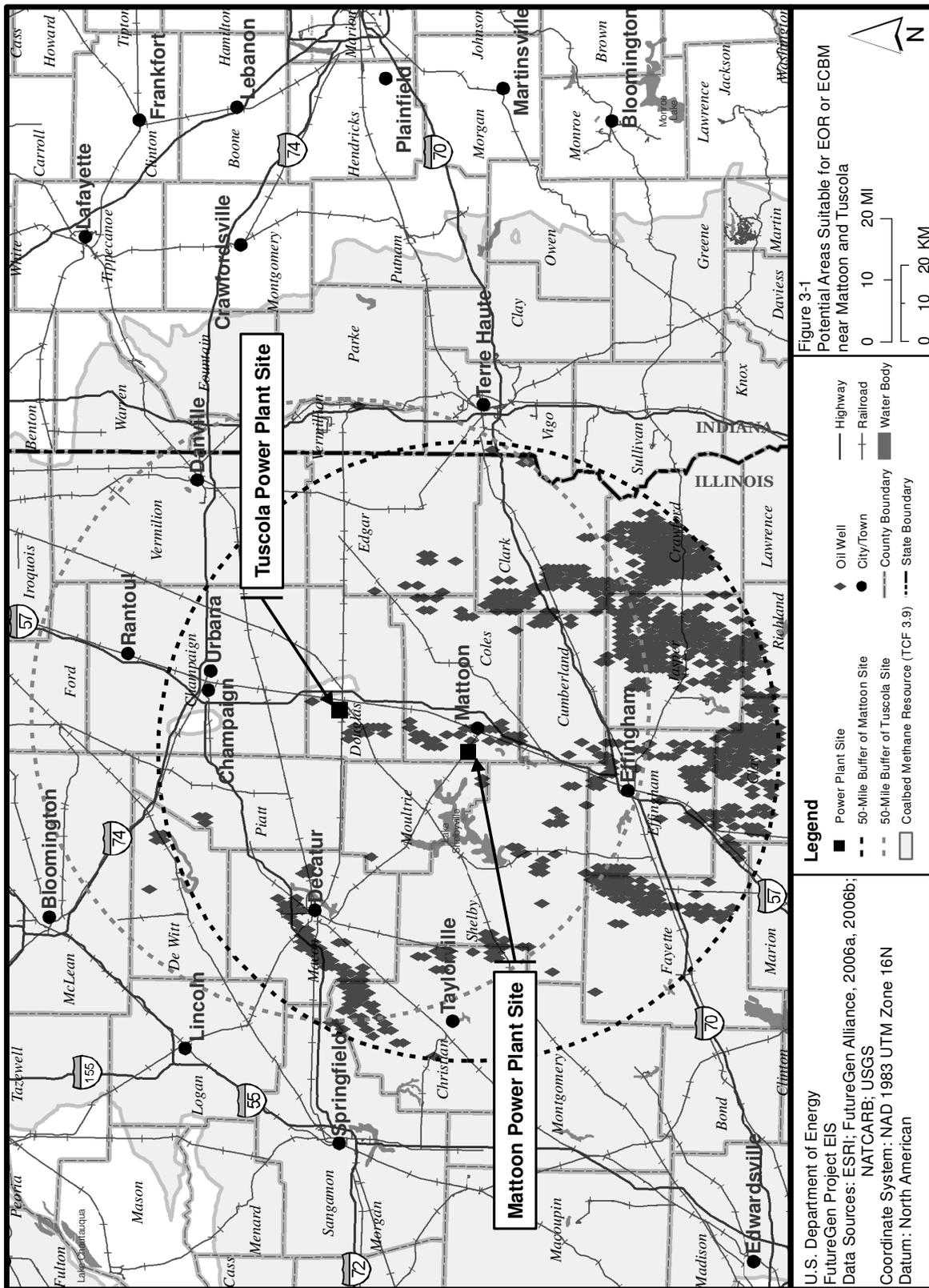


Figure 3-1  
Potential Areas Suitable for EOR or ECBM  
near Mattoon and Tuscola

**Legend**

- Power Plant Site
- Oil Well
- City/Town
- County Boundary
- State Boundary
- Highway
- Railroad
- Water Body
- 50-Mile Buffer of Mattoon Site
- 50-Mile Buffer of Tuscola Site
- Coaled Methane Resource (TCF 3.9)

U.S. Department of Energy  
FutureGen Project EIS  
Data Sources: ESRI; FutureGen Alliance, 2006a, 2006b;  
NATCARB; USGS  
Coordinate System: NAD 1983 UTM Zone 16N  
Datum: North American

### 3.3.2.2 Relevant Past and Ongoing Activities in Texas

Two initiatives are underway in Texas to promote clean energy and reduce air emissions. The first is the Texas Emissions Reduction Plan, which aims to reduce NO<sub>x</sub> emissions. The program offers state funds to replace older engines in vehicles with cleaner-burning models that produce less pollution and strives to reduce NO<sub>x</sub> emissions by 13,000 tons (11,793 metric tons) per year (Texas Office of the Governor, 2004a). The goal of the second law, signed in 2005, is to increase the production of clean energy (such as wind, biomass, and solar power) in Texas. The law requires that about 5 percent of the state's energy comes from renewable sources by 2015 and sets a goal of 10 percent by 2015. It also helps diversify the state's energy sources by requiring that 500 MW be produced by renewable sources other than wind, such as biomass and solar power (Texas Office of the Governor, 2005a). However, a number of traditional coal-fueled power plants are currently proposed in Texas. The proposed power plants within 50 miles (80.5 kilometers) of Jewett are listed in Section 3.3.3.2.

The Industry Cluster Initiative, announced in 2004, concentrates businesses and industries within a geographic region. The initiative allows Texas to direct infrastructure funding to regions and locations where weaknesses exist and assist long-range planning efforts. In particular, the energy cluster category (which includes oil and gas production, power generation and transmission, and manufactured energy systems) is potentially relevant to the FutureGen Project in terms of synergies that could be created through co-location of other industries nearby in the future (Texas Office of the Governor, 2004b). As both Texas sites are not covered by zoning plans, this initiative could be a driving force for future development around the sites.

With regard to water resources in the Jewett ROI, more than \$500,000 were made available to the Trinity River Basin Environmental Restoration Project in 2006. The state funds will be used for stormwater control, irrigation programs, and education. These funds, plus additional private dollars, could leverage as much as \$30 million over 5 years to develop a comprehensive water flow model with the U.S. Army Corps of Engineers (USACE), improve water quality, enhance wildlife habitat, and expand ecotourism opportunities in the Trinity River Basin. The Trinity River has a long history of water quality problems dating back to the early 1900s, but over the past several decades, water quality has improved and the river's fisheries are returning to a much healthier state (Texas Office of the Governor, 2006a).

Water availability is an important issue in Texas. Texas' rapidly growing population and history of severe droughts could easily result in severe water shortages in the future. Without water management strategies and projects, about 85 percent of the state's projected population would not have enough water by 2060 in drought conditions. In 2002, the State Water Plan incorporated approved regional water plans and provided for the orderly development, management, and conservation of water resources and preparation for and response to drought conditions. The plan was revised and adopted on November 14, 2006. Although conservation is a key component, some initiatives aim to increase the water supply through desalination, rainwater harvesting, and reuse of wastewater (TWDB, 2006).

The state has approximately 150 inland desalination units that produce 40 to 50 million gallons (151.4 to 189.3 million liters) of fresh water from brackish groundwater and surface water each day. In 2006, guidelines for the potential harvesting of rainwater in Texas were developed. A number of communities and water providers in Texas treat wastewater for direct and indirect reuse. Although wastewater can be treated to achieve compliance with federal and state drinking water standards, no entity in Texas currently distributes treated wastewater for drinking water purposes.

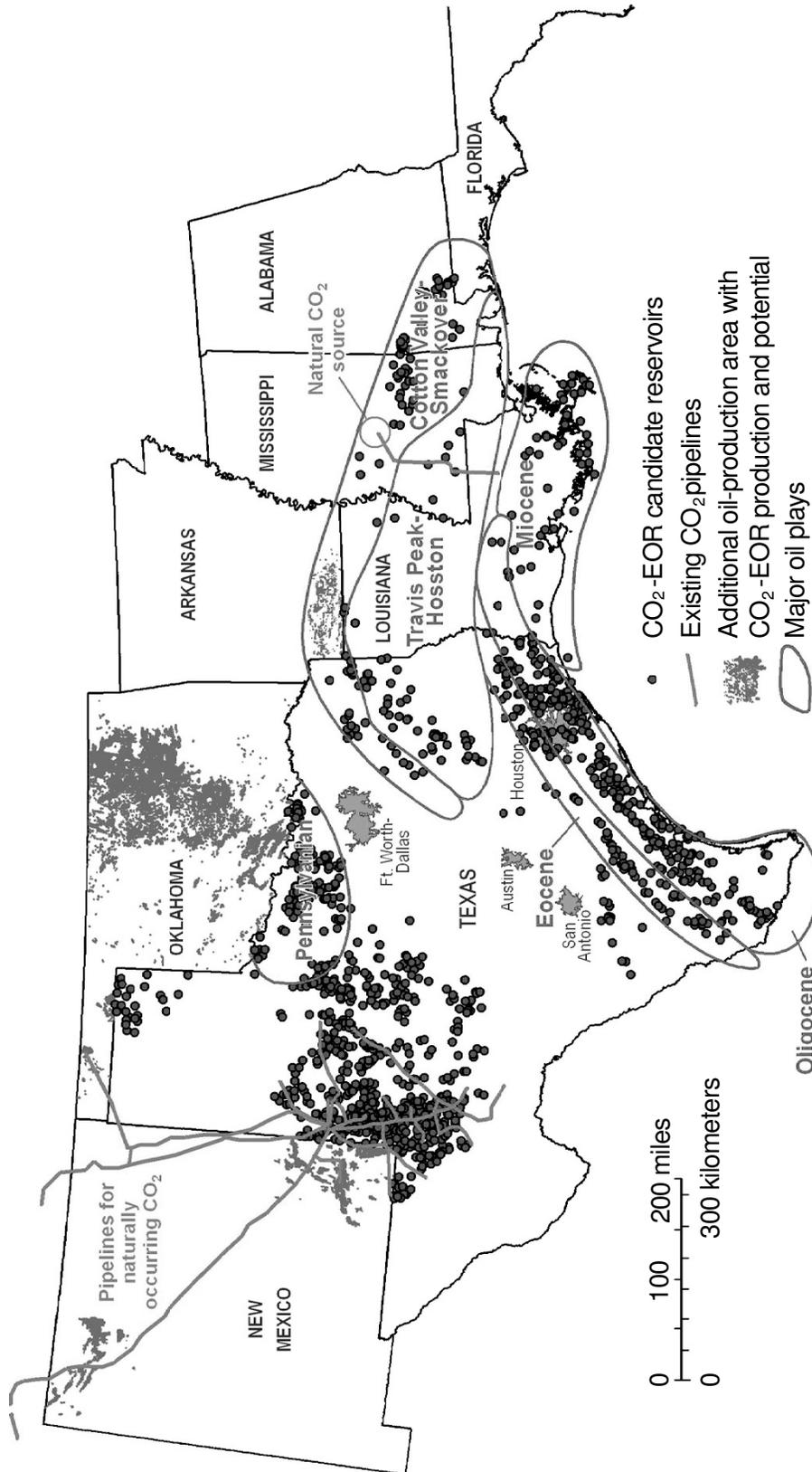
In 2005, Texas and Union Pacific developed a partnership to move freight lines away from densely populated urban areas across the state (Texas Office of the Governor, 2005b). Funding and specific

projects have not been determined. The movement of rail lines would lead to safer crossings, less hazardous cargo carried through populated areas, and greater freight movement efficiency.

There are five coal mines within 50 miles (80.5 kilometers) of the Jewett Site: Big Brown in Freestone County, Twin Oak in Robertson County, Calvert in Robertson County, Gibbons Creek in Grimes County, and the adjacent Jewett Mine. No new coal mines are currently planned within a 50-mile (80.5-kilometer) radius of the site (TRRC, 2006). The FutureGen Project, if located in Jewett, could potentially use coals from these existing mines. Existing coal mining operations at the Jewett Surface Lignite Mine would continue at least through 2015. The Jewett Mine produced 7 million tons (6.4 metric tons) of lignite in 2005. The company estimates that there are 75 million tons (68.0 MMT) of lignite coal reserves and deposits currently at the mine. At the current rate of production, it is possible that the mine's coal reserves would be consumed almost entirely by the end of their contract period in 2015.

Texas has numerous opportunities for EOR. The Bureau of Economic Geology (BEG) at the University of Texas estimates that Texas has more than 1.4 billion tons (1.3 billion metric tons) of sequestration capacity (Holtz et al., 2005). Furthermore, BEG estimates that, in the Gulf Coast (outside of the traditional area of CO<sub>2</sub> EOR in the Permian Basin), an additional 4.5 billion barrels of oil could be produced by using miscible CO<sub>2</sub>. Figure 3-2 shows Texas oil reservoirs that could potentially receive CO<sub>2</sub> from the FutureGen Project. The closest of these reservoirs to the Jewett Site, and most probable targets for EOR, are on the western ends of the Travis Peak (Hosston) and Cotton Valley-Smackover oil plays. Figure 3-3 depicts oil wells and coalbed methane resource areas within 50 miles (80.5 kilometers) of the Jewett Site.

Near the Odessa candidate site, an existing CO<sub>2</sub> pipeline may be the most likely avenue to deliver FutureGen CO<sub>2</sub> to any number of local oil fields. Figure 3-4 depicts oil wells within a 50-mile (80.5-kilometer) radius of the Odessa Site. Comparatively, much greater opportunities exist for EOR than ECBM recovery near the Odessa Site.



Source: Holtz et al., 2005

Figure 3-2. Map of Candidate Oil Reservoirs for EOR in Texas

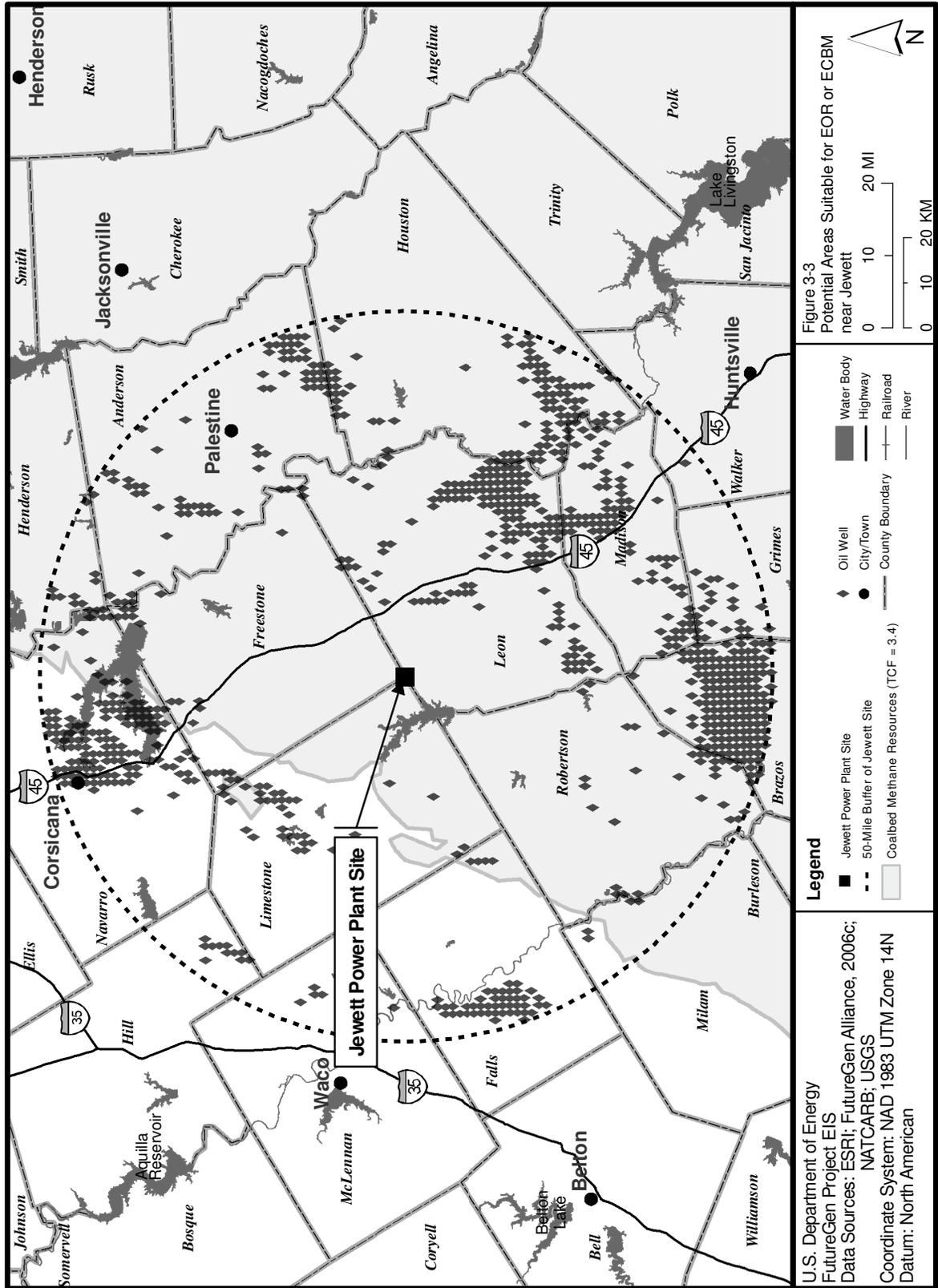


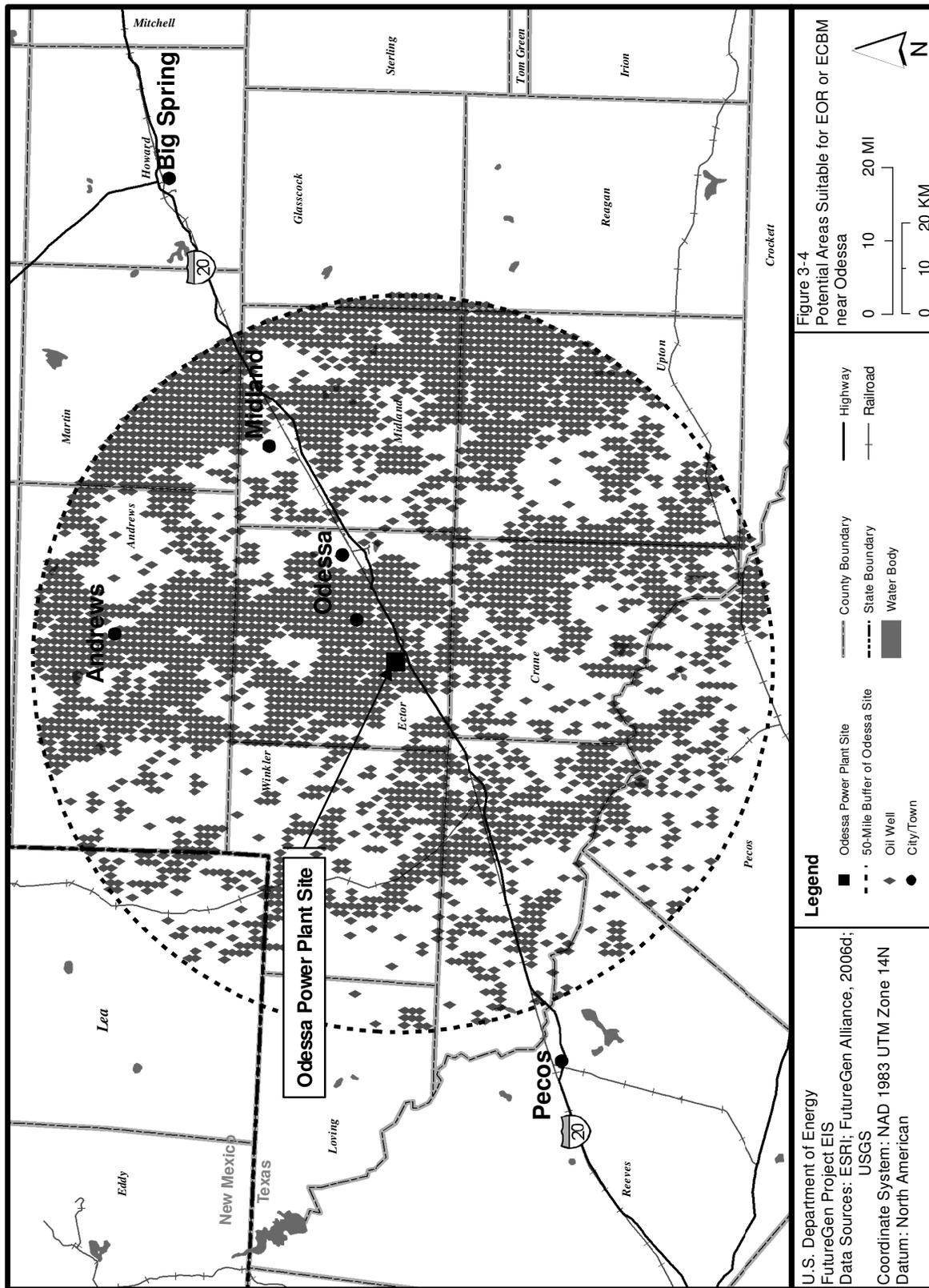
Figure 3-3  
Potential Areas Suitable for EOR or ECBM  
near Jewett

0 10 20 MI  
0 10 20 KM

**Legend**

- Jewett Power Plant Site
- ◆ Coalbed Methane Resources (TCF = 3.4)
- Oil Well
- City/Town
- Water Body
- Highway
- Railroad
- River
- County Boundary
- City/Town Boundary

U.S. Department of Energy  
FutureGen Project EIS  
Data Sources: ESR; FutureGen Alliance, 2006c;  
NATCARB; USGS  
Coordinate System: NAD 1983 UTM Zone 14N  
Datum: North American



### 3.3.3 REASONABLY FORESEEABLE FUTURE ACTIONS NEAR ALTERNATIVE SITES

This section discusses relevant and reasonably foreseeable future actions within 50 miles (80.5 kilometers) of each candidate site. These actions, when considered in context with impacts expected for each alternative site, would have the potential to result in cumulative impacts, as discussed in Section 3.3.4. These major actions generally fall into the categories of other planned conventional power plants, alternative energy projects, sequestration projects, coal mining, and transportation projects. Because the Mattoon and Tuscola candidate sites are within approximately 25 miles (40.2 kilometers) of one another, many of the reasonably foreseeable actions are common to their respective ROIs and are discussed together.

#### 3.3.3.1 Mattoon and Tuscola

Table 3-6 summarizes reasonably foreseeable projects identified within 50 miles (80.5 kilometers) of the Mattoon and Tuscola candidate sites.

**Table 3-6. Reasonably Foreseeable Projects within the Mattoon and Tuscola, Illinois ROIs**

Project	Description
<b>Fossil Fuel Power Plants</b>	
The Taylorville Energy Center (TEC)	The TEC, a 660-MW IGCC power plant, is planned for a 329-acre (133-hectare) site situated northeast of Taylorville in Christian County. Approximately 150 acres (61 hectares) would be used for the plant and equipment with the balance serving as raw material storage and as a buffer area. The property is located immediately north of the planned Christian Coal mine site.
<b>Alternative Energy Projects</b>	
Biofuels Company of America, LLC	Biofuels Company of America, LLC, has proposed to construct a bio-diesel production facility in Danville capable of producing 45 million gallons (170.3 million liters) of fuel per year using the equivalent of 30 million bushels of soybeans. The facility would be located approximately 45 miles (72.4 kilometers) northeast of Tuscola and over 50 miles (80.5 kilometers) northeast of Mattoon (Illinois Office of the Governor, 2006).
Illinois Clean Fuels	Illinois Clean Fuels has proposed to construct a coal-to-bio-diesel fuel plant that would use coal gasification technology similar to that proposed for the FutureGen Project. The plant would convert 4.3 million tons (3.9 MMT) of coal from a new mine into 385 million gallons (1.5 million liters) of fuel per year. Although a specific site has not yet been chosen for the facility, it would be located in the Oakland area in Coles County, which is approximately 20 miles (32.2 kilometers) northeast of Mattoon and approximately 15 miles (24.1 kilometers) southeast of Tuscola. Illinois Clean Fuels expects the plant to be operational by 2012 and create 600 jobs (Mitchell, 2006).
Diamond Ethanol Plant	The Diamond Ethanol Plant is proposed to be constructed in Charleston in Coles County and would produce 60 million gallons (227.1 million liters) of ethanol from 21 million bushels of corn a year using natural gas as fuel. The plant would be located approximately 12 miles (19.3 kilometers) east of Mattoon and 20 miles (32.2 kilometers) south of Tuscola (Stroud, 2006). The plant would include a new rail siding.
Illini Ethanol, LLC	Illini Ethanol, LLC, has proposed to construct an ethanol manufacturing plant near Royal, in Champaign County. The plant would produce up to 110 million gallons (416.4 million liters) of ethanol per year and would use natural gas as fuel. The plant would be approximately 30 miles (48.3 kilometers) northeast of Tuscola and 40 miles (64.4 kilometers) northeast of Mattoon.

**Table 3-6. Reasonably Foreseeable Projects within the Mattoon and Tuscola, Illinois ROIs**

Project	Description
Andersons Champaign Ethanol	The Andersons Champaign Ethanol is a proposed natural-gas-fueled ethanol plant in Champaign, which would be capable of producing up to 125 million gallons (473 million liters) of ethanol per year (IEPA, 2006a). The plant would be located approximately 30 miles (48.3 kilometers) north of Tuscola and 45 miles (72.4 kilometers) north of Mattoon in the City of Champaign. Local residents have raised environmental concerns about the proposed project, particularly with respect to the proposed plant drawing approximately 1 million gallons (3.8 million liters) of water per day from the Mahomet Aquifer. However, because no scientific surveys have been performed on the aquifer, no local entities are capable of regulating it (Carter, 2006).
Danville Renewable Energy, LLC	Danville Renewable Energy, LLC, has proposed to construct a natural-gas-fueled ethanol plant in Danville, Vermilion County. The plant would be located approximately 45 miles (72.4 kilometers) northeast of Tuscola and over 50 miles (80.5 kilometers) northeast of Mattoon (IEPA, 2006b). The plant would turn 40 million bushels of corn into 200 million gallons (757 million liters) of ethanol per year (Binder, 2006).
Twin Groves Wind Farm	Twin Groves Wind Farm, which is expected to become operational in 2007, will offer 396 MW of energy produced from 240 wind turbine generators. The site for the facility is in McLean County just east of Bloomington, which is approximately 45 miles (72 kilometers) northwest of Tuscola and approximately 60 miles (97 kilometers) northwest of Mattoon. It would install 240 turbines over approximately 21,000 acres (8,500 hectares) of leased land. The wind farm is expected to remove 150 to 200 acres (61 to 81 hectares) of land from crop production (Horizon Wind Energy, 2005).
Emerald Renewable Energy –Tuscola, LLC	An ethanol plant is being planned near the Tuscola Site. Although an air permit was submitted to IEPA on December 22, 2006, there is currently no construction schedule. This proposed plant would use corn as feedstock and would produce 100 million gallons (378 million liters) of ethanol per year. Along with the Douglas County Farm Bureau, Tuscola Economic Development is promoting its city as a site for an ethanol plant. It received a \$25,000 AgriFirst grant from the State of Illinois in March 2006 to help develop the facility, according to the Illinois Farm Bureau website. It is possible that the plant could receive its energy from the existing Synergy plant. The plant would generate 35 jobs and corn would be supplied from within a 50-mile (80.5-kilometer) radius. A spokesman for Illinois Prairie Ethanol estimated that based on the capacity of the facility there would be an estimated 10 to 70 trucks unloading at the facility daily (JG-TC Online, 2006). The facility would use natural gas boilers.
<b>Geologic Sequestration Projects</b>	
Midwest Geological Sequestration Consortium (MGSC) CO <sub>2</sub> Sequestration Projects	In the Illinois Basin, the MGSC will determine the ability, safety, and capacity of geological reservoirs to store CO <sub>2</sub> in deep coal seams, mature oil fields, and deep saline reservoir formations. Each of these projects will obtain CO <sub>2</sub> from ethanol plants or refineries in Illinois and Indiana. Deep coal seam sequestration tests will involve injecting approximately 100 tons (90.7 metric tons) of CO <sub>2</sub> into coal seams at two test sites: the Newton Plant in Jasper County, Illinois and a site in Hutsonville, Crawford County, Illinois. The Newton Plant site is approximately 30 miles (48.3 kilometers) south of Mattoon and approximately 50 miles (80.5 kilometers) south of Tuscola. Hutsonville is approximately 35 miles (56 kilometers) southeast of Mattoon and approximately 45 miles (72.4 kilometers) southeast of Tuscola. Mature oil field tests will involve injecting between 1,000 and 2,500 tons (907 and 2,268 metric tons) of CO <sub>2</sub> at two sites that will be selected from potential locations in Indiana, Illinois, and Kentucky. Saline reservoir formation tests will also involve the injection of between 1,000 and 2,500 tons (907 and 2,268 metric tons) of CO <sub>2</sub> into two of three saline formations: the St. Peter sandstone formation, the Mt. Simon sandstone formation, and the Ironton-Galesville formation. One of the five potential sites for the field testing is Mattoon Field in Coles County, Illinois, which is located within 10 miles (16.1 kilometers) of Mattoon and is within 25 miles (40.2 kilometers) of Tuscola (NETL, 2006a).

**Table 3-6. Reasonably Foreseeable Projects within the Mattoon and Tuscola, Illinois ROIs**

Project	Description
CO <sub>2</sub> Pipeline	As part of the State of Illinois' Governor's Energy Independence Plan, a 140-mile (225-kilometer) CO <sub>2</sub> pipeline would connect planned coal gasification plants to EOR and ECBM areas in southeastern Illinois. A route and timeline have not been determined.
<b>Transportation Projects</b>	
IDOT Proposed Highway Improvement Plan (IDOT, 2006).	There are numerous IDOT projects planned in the ROI for both the Mattoon and Tuscola sites. Most of these projects are roadway and bridge maintenance including resurfacing, shoulder reconstruction, and rail crossing improvements. More substantive projects include a bridge replacement on I-130 in Olney, for US 40 over the Union Pacific Railroad, and at the CSX Railroad and US 36.
CR 1000N proposed upgrade between Charleston and Mattoon	A proposed upgrade to CR 1000N between Charleston and Mattoon would interchange with I-57. It is expected that the new interchange of I-57/CR 1000N would result in immediate development pressures nearby and eventual development along other portions. CR 1000N connects the industrial developments north of Charleston and north of Mattoon with I-57.
Proposed improvement of CH 13 to a Class II truck route from CH 18 to the entrance of the proposed Mattoon Power Plant Site, including the intersection with SR 121	The IDOT has scheduled future construction to improve CH 13 to a Class II truck route from CH 18 to the entrance of the proposed Mattoon Power Plant Site, including the intersection with SR 121. This construction is already being planned and is not related to the Proposed Action. This new construction would consist of 1.25 miles (2.0 kilometers) of roadway widening and resurfacing with new shoulders and ditches. The intersection of SR 121 and CH 13 would be rebuilt so CH 13 approaches at right angles. A turn lane would also be built on SR 121.

### 3.3.3.2 Jewett

Table 3-7 summarizes reasonably foreseeable projects identified within 50 miles (80.5 kilometers) of the Jewett candidate site.

**Table 3-7. Reasonably Foreseeable Projects within the Jewett, Texas ROI**

Project	Description
<b>Fossil Fuel Power Plants<sup>1</sup></b>	
NRG Limestone Electric Generating Station	800-MW lignite coal-fueled boiler (Unit 3) at the existing plant in Jewett, Texas, adjacent to the Jewett Site. Expected operation date is 2012.
Oak Grove Mgmt. Co., LP (TWU)	1600-MW lignite coal-fueled power plant located in Robertson County. Site would be 12 miles (19.3 kilometers) north of Franklin, Texas, and 12 miles (19.3 kilometers) southwest of the Jewett Site. Expected operation date is 2009. This project would be near the existing Calvert coal mine.
Sandow 5 (replaces ALCOA units)	434-MW lignite coal-fueled power plant located in Rockdale, Milan County, Texas. Proposed plant would be 50 miles (80.5 kilometers) southwest of the Jewett Site. Expected operation date is 2007.
Sandy Creek En. Assocs., LP	600-MW coal-fueled power plant that would use PRB coal. Plant location would be 31 miles (49.9 kilometers) northwest of the Jewett Site on Rattlesnake Road in Riesel, McLennan County, Texas. Expected operation date is 2008.
Twin Oaks Power III, LP (Sempra)	600-MW lignite coal-fueled power plant that would be located in Robertson County, Texas, 8 miles (12.9 kilometers) north of Calvert and 31 miles (49.9 kilometers) north of the Jewett Site. Expected operation date is 2010. This project would be near the existing Twin Oaks coal mine.
<b>Alternative Energy Projects</b>	
No projects identified	

**Table 3-7. Reasonably Foreseeable Projects within the Jewett, Texas ROI**

<b>Project</b>	<b>Description</b>
<b>Geologic Sequestration Projects</b>	
Gulf Coast Basin, Southeast Regional Carbon Sequestration Partnership	In the Gulf Coast Basin, the Southeast Regional Carbon Sequestration Partnership will build upon the Frio Basin Project by testing a model for early CO <sub>2</sub> injection into an oil reservoir, followed by long-term, large-volume storage in underlying brine formations. A total of 15,000 tons (13,608 metric tons) of CO <sub>2</sub> is expected to be injected. Fifteen potential sites for the project have been identified and the selected site has yet to be determined (NETL, 2006b).
<b>Transportation Projects</b>	
FM 39 Relocation	The Texas Westmoreland Coal Company plans to relocate a section of FM 39 and the current train overpass to reclaimed land to facilitate the continuation of mining operations. This relocation is scheduled to begin in 2007 and be completed in approximately 1 year (FG Alliance, 2006c).
Texas Department of Transportation (TxDOT) roadway improvements (widening or new roads)	There are numerous TxDOT projects planned in the ROI, including improvements to FM 60 from FM 50 to Snook, FM 2154 from FM 2818 to SH 40, SH 21 from Kurten to the Navasota River, SH 6 from Hearne to Calvert, FM 60 from SH 6 to FM 158, US 79 Rockdale Relief Route, and SH 249 from Montgomery County to SH 6 (FG Alliance, 2006c).
Trans-Texas Corridor (TTC-35)	TxDOT is evaluating a TTC-35 that would parallel the existing I-35 from the Oklahoma border through Central Texas to the border with Mexico. If developed, this corridor would run north-south approximately 40 miles (64.4 kilometers) west of the Jewett Site. Construction could begin in 2011 pending environmental clearance to determine the corridor's ultimate alignment. A tier-one EIS for the project was issued in April 2006 (TxDOT, 2006a).

<sup>1</sup> Source: Alamo Area Council of Governments, 2006.

The planned coal-fueled power plants listed in Table 3-7 are within 50 miles (80.5 kilometers) of the proposed Jewett Power Plant Site. However, there are several similar power plants currently proposed in the northeastern portion of Texas. There have been concerns raised by the public and environmental organizations regarding cumulative impacts to air quality of all these proposed coal-fueled power plants.

In addition to the projects listed in Table 3-7, the existing NRG Limestone Electric Generating Station in Jewett will be the site of a DOE Clean Coal Power Initiative (CCPI) project, "Mercury Species and Multi-Pollutant Control," under a cooperative agreement signed in April 2006 with DOE. Performance testing of the project is expected to begin in October 2008 and last 38 months. The project will demonstrate advanced sensors and neural network-based optimization and control technologies for enhanced Hg and multi-pollutant control on its existing 890-MW boiler. The technology, once demonstrated, should have broad application to existing coal-fueled boilers and provide positive impacts on the quality of saleable byproducts, such as fly ash (NETL, 2006c).

### 3.3.3.3 Odessa

Table 3-8 summarizes reasonably foreseeable projects identified within 50 miles (80.5 kilometers) of the Odessa candidate site.

**Table 3-8. Reasonably Foreseeable Projects within the Odessa, Texas ROI**

<b>Project</b>	<b>Description</b>
<b>Fossil Fuel Power Plants</b>	
Navasota Energy's Quail Run Energy Center	550-MW natural-gas-fired power plant currently under construction in the Odessa Business Park, approximately 19 miles (30.6 kilometers) to the northeast of the Odessa Site. Expected completion date is 2008 (Reuters, 2006). The plant would be able to transport power to Houston or Dallas markets on existing grids.
<b>Alternative Energy Projects</b>	
Forest Creek Wind Farm	125-MW wind farm located on remote rangeland approximately 50 miles (80.5 kilometers) east of the Odessa Site. Expected operation date is the end of 2006 (Wells Fargo, 2006).
Major Energy Diversification Plan	On October 2, 2006, the Governor of Texas announced a Major Energy Diversification Plan that would invest \$10 billion in capital through a public-private initiative that would invest in wind energy projects (Texas Office of the Governor, 2006b). This initiative could promote additional wind farms to be built in west Texas.
<b>Geologic Sequestration Projects</b>	
Southwest Regional Partnership for Carbon Sequestration	Southwest Regional Partnership for Carbon Sequestration will perform post-audit modeling analysis of injected CO <sub>2</sub> for EOR at the <b>Southwest Regional Partnership for Carbon Sequestration</b> Unit over the last 30 years to define a working model of the nearby Claytonville field with similar geology that has never been subject to CO <sub>2</sub> injection. The <b>Southwest Regional Partnership for Carbon Sequestration</b> - Claytonville pilot will be an initial analysis of the potential for CO <sub>2</sub> storage in the "Horseshoe Atoll" system, a huge system with potentially enormous CO <sub>2</sub> capacity. A total of 300,000 tons (272,155 metric tons) of CO <sub>2</sub> would be injected at the <b>Southwest Regional Partnership for Carbon Sequestration</b> -Claytonville Fields near Snyder, Scurry County, Texas, which is approximately 80 miles (128 kilometers) northeast of Odessa (NETL, 2006b).
<b>Transportation Projects</b>	
La Entrada al Pacifico Rail Corridor	There is a proposal for a new rail corridor between the U.S. and Mexico that would connect the Midland-Odessa area of west Texas to the South Orient rail line. This line would be part of the La Entrada al Pacifico (Entrance to the Pacific) trade corridor. This proposed rail corridor would connect the South Orient between Rankin and McCamey, and would enable freight to travel from northwest Texas and the Panhandle to the border at Presidio (TxDOT, 2005). No approvals or timeline for this project have been set.

According to the 2006 to 2008 Statewide Transportation Improvement Program, there are no programmed major roadway improvements for the Midland-Odessa metropolitan area that would occur after 2009. However, the current program period does not extend past 2009 (TxDOT, 2006b).

### 3.3.4 POTENTIAL CUMULATIVE IMPACTS FOR ALTERNATIVE SITES

The following sections describe potential cumulative impacts that could occur at each of the candidate sites. These impacts are principally related to the potential for additional air emissions, increases in traffic and noise along transportation corridors that are common to the FutureGen Project, and the consumption of local resources within the ROIs.

#### 3.3.4.1 Mattoon and Tuscola

One new coal IGCC plant is proposed within 50 miles (80.5 kilometers) of Mattoon, as well as several alternative energy projects (e.g., bio-diesel and ethanol plants). The primary concern regarding these projects is the potential for cumulative air emissions. The proposed Taylorville Energy Center (IGCC power plant) would be a large-quantity generator of air pollution subject to PSD requirements. Table 3-9 lists the allowable emissions in tons per year as cited in the draft construction permit for the

project (IEPA, 2006a). These criteria pollutant emission levels are similar to the maximum emissions predicted for the FutureGen Project during the DOE-sponsored phase.

**Table 3-9. Draft Air Permit Emissions for the Taylorville Energy Center**

Project	MW	NO <sub>x</sub> (tpy [mtpy])	CO (tpy [mtpy])	VOC (tpy [mtpy])	PM/PM <sub>10</sub> (tpy [mtpy])	SO <sub>2</sub> (tpy [mtpy])
Taylorville Energy Center	600	629 (570.6)	920 (834.6)	28 (25.4)	412 (373.8)	299 (271.2)

MW = megawatts; tpy = tons per year; mtpy = metric tons per year.

Although the Taylorville IGCC power plant could be converted for carbon capture and sequestration in the future, without sequestration, it would emit approximately 7.3 million tons (6.6 MMT) of CO<sub>2</sub> annually (scaled in terms of MW output from the FutureGen Power Plant).

The Taylorville Energy Center would require over 4,900 gallons (18,549 liters) per minute of water. The City of Taylorville would provide water to the power plant through a 25-year agreement. The source of the water would be the Sangamon River or associated well fields. There is also an alternative for “grey water” to be used. Subsequently, the Taylorville Energy Center would use different water sources than those proposed for the Illinois FutureGen site alternatives. The proposed Taylorville Energy Center would be co-located at the Christian Coal Mine, which would supply the coal for the plant. *Therefore*, the Taylorville Energy Center is not expected to increase regional train shipments of coal, although it could still receive materials and chemical shipments and ship its byproducts, such as slag and sulfur, by rail.

The proposed ethanol and bio-diesel plants in the ROI would also emit large quantities of criteria pollutants and HAPs (Table 3-10). Three of the ethanol projects (Andersons Champaign, Illini, and Danville Renewable) have received construction permits with specified air emission limits. The average ratio of these emission limits per million gallons of ethanol produced was used to develop emission estimates for the other four ethanol and bio-diesel plants.

According to a study conducted by Frontline BioEnergy in 2005, a coal-powered ethanol plant producing 50 million gallons (189 million liters) of ethanol a year would release as much as 207,000 tons (187,787 metric tons) of CO<sub>2</sub> per year, while a natural gas-powered plant would emit 108,000 tons (97,976 metric tons) (Quad-City Times, 2005). All five of the planned ethanol plants (shown in Table 3-10) would use natural gas as a fuel. Based on the finding of the Frontline BioEnergy study, these ethanol plants could collectively emit almost 1 million tons (907,185 metric tons) of CO<sub>2</sub> annually. It is unknown if any of these projects would sell the CO<sub>2</sub> for other beneficial uses (e.g., utilized for EOR or ECBM projects) or sequester it underground. However, the ethanol produced could be used as an additive to, or replacement for, conventional gasoline in automobiles. The Pew Center estimates that corn-based ethanol reduces full fuel-cycle GHG emissions by slightly more than 30 percent in comparison with gasoline (Pew Center, 2003).

**Table 3-10. Permitted and Estimated Air Emissions from Proposed Ethanol and Bio-Diesel Plants near Mattoon and Tuscola**

Project or Category	Grain Processed (tpy [mtpy]) max	Ethanol/Bio-diesel Produced (million gallons [million liters]) per year max	Natural Gas Usage (cubic feet [cubic meters]) per month max	NO <sub>2</sub> (tpy [mtpy]) max	CO (tpy [mtpy]) max	VOCs (tpy [mtpy]) max	PM/PM <sub>10</sub> (tpy [mtpy]) max	SO <sub>2</sub> (tpy [mtpy]) max	Acetaldehyde (tpy [mtpy]) max	Total HAPs (tpy [mtpy]) max
Andersons Champaign Ethanol <sup>1</sup>	1,450,000 (1,315,418)	125 (473.2)	3,760 (3,411)	96.75 (87.8)	98 (88.9)	88.64 (80.4)	97.99 (88.9)	93.31 (84.6)	9.8 (8.9)	22.21 (20.1)
Illini Ethanol <sup>2</sup>	1,100,000 (997,903)	110 (416.4)	4,575 (4,150)	97.9 (88.8)	93.8 (85.1)	91.9 (83.4)	96.5 (87.5)	53.5 (48.5)	2.8 (2.5)	21.8 (19.8)
Danville Renewable (Ethanol) <sup>3</sup>	1,128,360 (1,023,631)	113.7 (430.4)	5,200 (4,717)	96.29 (87.4)	93.77 (85.1)	97.77 (88.7)	96.35 (87.4)	61.45 (55.7)	9.39 (8.5)	19.19 (17.4)
Subtotal of Draft Permit Values	3,678,360 (3,336,952)	349 (1,321)	13,535 (12,279)	291 (264.0)	286 (259.5)	278 (252.2)	291 (264.0)	208 (188.7)	22 (20.0)	63 (57.2)
Average per million gallons of ethanol produced	10,549 (9,570)	1 (3.8)	38.816 (1.1)	0.834 (0.8)	0.819 (0.7)	0.798 (0.7)	0.834 (0.8)	0.597 (0.5)	0.063 (0.06)	0.181 (0.2)
Biofuels Company of America <sup>4</sup>	474,695 (430,636)	45 (170.3)	1,746.7 (49.5)	37.5 (34.0)	36.9 (33.5)	35.9 (32.6)	37.5 (34.0)	26.9 (24.4)	2.8 (2.5)	8.2 (7.4)
Diamond Ethanol <sup>4</sup>	632,927 (574,182)	60 (227.1)	2,328.9 (65.9)	50.1 (45.4)	49.1 (44.5)	47.9 (43.5)	50.0 (45.4)	35.8 (32.5)	3.8 (3.4)	10.9 (9.9)
Emerald Renewable Energy Ethanol Plant at Tuscola <sup>4</sup>	527,439 (478,485)	100 (378.5)	1,940.8 (55.0)	41.7 (37.8)	40.9 (37.1)	39.9 (36.2)	41.7 (37.8)	29.9 (27.1)	3.2 (2.9)	9.1 (8.3)
Illinois Clean Fuels (bio-diesel) <sup>4</sup>	4,061,281 (3,684,332)	385 (1,457)	14,944 (423.2)	321.2 (291.4)	315.3 (286.0)	307.3 (278.8)	321.1 (291.3)	229.9 (208.6)	24.3 (22.0)	69.8 (63.3)
Subtotal of Estimated Values	5,706,891 (5,177,204)	591.0 (2,237)	20,999 (594.6)	451.3 (409.4)	443.0 (401.9)	431.8 (391.7)	451.1 (409.2)	323.1 (293.1)	34.2 (31.0)	98.2 (89.1)
Ethanol and Bio-diesel Total	<b>9,385,251 (8,514,157)</b>	<b>940 (3,558)</b>	<b>34,534 (977.9)</b>	<b>742.3 (673.4)</b>	<b>729 (661.3)</b>	<b>709.8 (643.9)</b>	<b>742.1 (673.2)</b>	<b>531.1 (481.8)</b>	<b>56.2 (51.0)</b>	<b>161.2 (146.2)</b>

<sup>1</sup> IEPA, 2006b.<sup>2</sup> IEPA, 2006c.<sup>3</sup> IEPA, 2006d.<sup>4</sup> Emissions and grain estimates were scaled from the projects with construction permits.  
tpy = tons per year; mtpy = metric tons per year; max = maximum; HAPs = hazardous air pollutants.

Table 3-11 compares the maximum estimated emissions from proposed sources (Taylorville Energy Center, ethanol and bio-diesel plants, and the FutureGen Project). Based on the maximum emission case, the largest contribution of air pollutants related to the FutureGen Project would be NO<sub>2</sub>, SO<sub>2</sub>, and CO. The FutureGen Project would contribute up to 36 percent and 40 percent of the cumulative NO<sub>x</sub> and SO<sub>x</sub> emissions, respectively, and up to 27 percent of cumulative CO emissions. The Mattoon and Tuscola power plant sites are in attainment areas and are substantially below the NAAQS for these pollutants (see Sections 4.2 and 5.2, respectively). Therefore, the cumulative impact from NO<sub>2</sub>, SO<sub>2</sub>, and CO emissions from the FutureGen Project would not be expected to cause exceedance of NAAQS. Ambient concentrations of PM<sub>2.5</sub> are much closer to the NAAQS, and cumulative air emissions from proposed facilities in the region would likely cause the PM<sub>2.5</sub> concentrations to increase. Detailed modeling of all the proposed sources, along with the existing sources and local air quality data, would be required to estimate more accurately whether the cumulative impact of the proposed sources could result in the PM<sub>2.5</sub> standard being exceeded. However, the FutureGen Project would represent less than 10 percent of the estimated future emissions of PM for the maximum case, and approximately three percent for the target case (See Section 2.5.6.1).

**Table 3-11. Comparison of All Proposed Emission Sources within the Mattoon and Tuscola ROIs**

Project or Category	NO <sub>2</sub> (tpy [metric tpy]) max	CO (tpy [metric tpy]) max	VOCs (tpy [metric tpy]) max	PM/PM <sub>10</sub> (tpy [metric tpy]) max	SO <sub>2</sub> (tpy [metric tpy]) max	CO <sub>2</sub> (million tpy [million metric tpy]) emitted
Taylorville Energy Center	629 (570.6)	920 (834.6)	28 (25.4)	412 (373.8)	299 (271.2)	7.3 (6.6)
Ethanol and Bio-Diesel Plants	742 (673.1)	728 (661.3)	710 (643.2)	742 (673.1)	531 (481)	1.1 (1.0)
FutureGen - --maximum case	758 (687.6)	611 (554.3)	30 (27.2)	111 (100.7)	543 (492)	0.17 to 0.41 (0.15 to 0.28)
--target case	326 (295.7)	n/a <sup>1</sup>	n/a <sup>1</sup>	33 (29.9)	212 (192)	0.11 to 0.25 (0.10 to 0.23)
Total --maximum case	2,129 (1,931)	2,260 (2,050)	768 (697)	1,264 (1,147)	1,372 (1,245)	9.6 (8.7)
--target case	1,697 (1,539)	n/a <sup>1</sup>	n/a <sup>1</sup>	1,187 (1,077)	1,041 (944)	7.85 (7.1)
FutureGen Percent of Total --maximum case	36 percent	27 percent	4 percent	9 percent	40 percent	5 percent
--target case	19 percent	n/a <sup>1</sup>	n/a <sup>1</sup>	3 percent	20 percent	5 percent

<sup>1</sup> n/a indicates that emission targets for these pollutants have not been established.  
tpy = tons per year; max = maximum.

Although water needs for all of the proposed ethanol plants are not published, the Andersons Champaign plant would use approximately 1 million gallons (3.8 million liters) of groundwater a day. Local residents expressed concerns about the ability of the aquifer to sustain this withdrawal. Therefore, it is reasonably foreseeable that water withdrawals from the Mahomet Aquifer may constrain these types of projects in the future. *It is unknown to what extent the other proposed ethanol plants would use surface water instead of groundwater.* Based on the ratio of water use to ethanol production for the Andersons Champaign ethanol plant, the five proposed ethanol plants could collectively require **4.1 million gallons (5.1 million liters) of water daily**. However, processing may consume only 30 percent of the water and the remaining 70 percent (in the form of wastewater) could be filtered and either reused by the plant or returned to the aquifer. *If the biofuels projects used similar amounts of water, the combined water usage for the biofuel and ethanol plants would be 7.5 MGD (28.4 MLD).*

In comparison, the FutureGen Project (running at 85 percent capacity) could use up to 1.3 billion gallons (5.1 billion liters) of water annually (*assuming 4.3 MGD [16.28 MLD]*), which is nearly *one half that projected for* the combined operation of the *proposed biodiesel and ethanol plants*, although the FutureGen Project would completely consume (i.e., evaporate) its water intake.

*According to a 2006 study by the Illinois State Water Survey, the Mahomet Aquifer (located north of Douglas County) is one of four aquifer systems in Illinois in the most need of study and planning (ISWS, 2006). The Mahomet aquifer is the major groundwater resource for east-central Illinois. Many communities, industries, and irrigators depend on the aquifer for their supply, collectively consuming approximately 100 MGD (378 MLD). While the sustained yield of the Mahomet aquifer has been estimated to be in excess of 400 MGD (1,514 MLD), over-development of the aquifer can occur in localized areas. New field data coupled with computer modeling of the aquifer system is needed to examine development alternatives for community planners (ISWS, 2007). For example, within the Mahomet Aquifer region, population projections for these communities suggest that by 2020, the Mahomet Aquifer region may increase by 100,000 people to a total of 900,000. While the populations and water demands of Douglas and Coles counties to the south of the aquifer region (including the Cities of Mattoon and Tuscola) have remained relatively unchanged over the last 20 years, the communities of Springfield, Decatur, Bloomington and Danville (also outside the aquifer region) are examining the use of Mahomet Aquifer groundwater as an alternative to surface reservoirs with the potential to double the demand on the aquifer (increase demand by 80 MGD [303 MLD]).*

Because the primary water sources proposed for *FutureGen* in either Mattoon or Tuscola would come from the effluent of existing wastewater treatment facilities (municipal or industrial) and not groundwater, no *direct* cumulative impacts to the sustainability of groundwater withdrawals are expected to result from the FutureGen Project. *However*, process water for the Tuscola Site would be supplied by Kaskaskia River through an existing intake structure, and during certain low flow periods the Kaskaskia River source could be supplemented by groundwater withdrawals from wells owned by the Lyondell-Equistar Chemical Company. These groundwater withdrawals, if needed, would be temporary and are not expected to have any *substantial* cumulative impact to the sustainability of groundwater withdrawals within the region. *Furthermore, the Lyondell-Equistar Chemical Company is considering becoming a zero-discharge facility. If this occurred, the current water requirement would be reduced by 86 percent (saving 1.87 MGD [7.08 MLD]). This would off-set some of the water requirement for the FutureGen Project. In addition, increasing population and treated sanitary water discharge upstream along the Kaskaskia River will increase downstream water levels and availability for the Tuscola FutureGen site. Currently the average daily flow from the Urbana/Champaign Sanitation District is 7.68 MGD (29.07 MLD) with a maximum daily flow of 27.25 MGD (103.15 MLD). Based on population growth anticipated for this District, the water flow in the Kaskaskia will continue to increase over the next decade. With the increased river volume and the possibility of the chemical company going to zero-*

***discharge, the need to draw water from the Mahomet aquifer to service these industries or accommodate low flows in the Kaskaskia River in Tuscola will be virtually eliminated.***

Although the construction of most of these plants (Taylorville Energy Center and ethanol/bio-diesel plants) would be completed by the time the FutureGen Project would begin construction, it is possible that, in the short term, these projects may compete with the FutureGen Project for resources such as construction labor and local construction supplies. Collectively, they may increase short-term construction road traffic impacts in terms of truck deliveries and commuter vehicles. Over the long term, these projects would collectively increase both rail shipments and truck shipments on local highways.

For example, if all the grain and produced fuel from the proposed ethanol and bio-diesel plants were transported by train, this could require up to 246 10-car train shipments (one-way) each week in the region surrounding the Tuscola and Mattoon sites (see Table 3-12). The number of units on the train greatly influences the rail traffic calculation and this would be determined based on the site conditions at those plants and how many cars they could accommodate at a time. Much longer 100-car trains would reduce the number to 25 (one-way) train shipments a week. The FutureGen Project would require approximately five 100-car trains each week. Collectively, these projects would increase train shipments in the area to a large degree, although the contribution from the FutureGen Project would be minor in comparison to the other planned projects. The increase in rail and truck shipments for these projects could result in increases in noise along their respective rail and road corridors.

Coal accounts for 40 percent of the 2 billion tons (1.8 billion metric tons) of freight train shipments in the U.S. The proposed FutureGen Project coal shipments would account for less than 0.1 percent of the 816 million tons (740.3 MMT) of coal-related train shipments annually (AAR, 2006). Therefore, the FutureGen Project would have minimal impact on the national railroad system.

As presented in Table 3-6, a number of transportation projects would occur in the ROI. However, these projects are primarily for roadway improvements and maintenance activities that would be expected to improve roadway conditions over time. Although traffic from the FutureGen Project could exacerbate short-term impacts from roadway construction activities and associated detours, the impacts are expected to be minor and short term.

In addition, as with many development activities in this region, more prime farmland may be converted and lost due to land disturbance and construction activities. As discussed in the Land Use resource sections for Mattoon and Tuscola (Sections 4.11 and 5.11, respectively), approximately 27,060 acres (10,951 hectares) of prime farmland are lost per year in Illinois. The projects listed in Table 3-6 may lead to loss of prime farmland depending on their location. The FutureGen Project would cause the additional loss of up to 200 acres (81 hectares) of prime farmland.

With the initiatives currently in place to promote use of Illinois Basin Coal and the advancement of clean coal technologies that make the use of this coal feasible, coal mining within the region could increase over time. As a potential consumer of Illinois Basin coal, the FutureGen Project could provide additional incentive for certain coal mining activities in the region. However, this potential would largely be based on future decisions of the Alliance on the degree to which it chooses to use a particular coal or coal source.

As indicated in Section 3.3.3.1, there are numerous opportunities for EOR in the Mattoon ROI. There are also opportunities for ECBM recovery throughout the region. Over time, it is possible that new EOR or ECBM projects could emerge as a result of new CO<sub>2</sub> streams in the region, including those from the proposed ethanol plants and possibly the FutureGen Project. This is evidenced by the proposed 140-mile (225-kilometer) CO<sub>2</sub> pipeline discussed in Section 3.3.2.1. The potential cumulative impacts resulting

from these undertakings would principally be related to construction of the necessary infrastructure to transport the CO<sub>2</sub> to the injection location, as well as the activities that would occur at injection and recovery sites. The types of impacts that could occur with new EOR or ECBM projects are described in 3.3.1.1.

Additional geologic sequestration research activities within the Illinois Basin are being undertaken by the MGSC that would inject CO<sub>2</sub> in deep coal seams, mature oil fields, and deep saline formations. The MGSC estimates that there are over 45 billion tons (40.8 billion metric tons) of CO<sub>2</sub> storage capacity within the Illinois Basin. Of this capacity, 8.6 billion tons (7.8 billion metric tons) lie within deep saline formations (e.g., Mt. Simon and St. Peter formations) (MGSC, 2005). The FutureGen Project would use 0.64 percent of this saline formation capacity. Thus, while the FutureGen Project would subtract from available capacity, it would have a negligible impact on the ability for other sequestration projects to occur within the region.

The FutureGen Project could result in the future clustering of other industries on or around the selected site. At the Mattoon Site, this would cause further alteration of the character of the landscape. At the Tuscola Site, where there are existing and planned chemical plants nearby, this change would be less intrusive, although at both sites this would possibly displace additional prime farmland. The clustering of industry would introduce new air emission sources, truck and rail traffic, and noise that would degrade the environment to some degree.

#### 3.3.4.2 Jewett

As listed in Table 3-7, there are *five* new coal-fueled power plants within a 50-mile (80.5-kilometer) radius of the proposed Jewett Power Plant Site in various stages of planning and permitting. In addition, the NRG Limestone Electric Generating Station plans to add a lignite-fired boiler and 800-MW electric generating unit. Based on planning data, all of these plants *could* begin operation before the completion of the FutureGen Project.

Cumulative air quality impacts within the ROI for the Jewett Site would largely be driven by the combined emissions of these proposed facilities, which would be expected to be substantially greater than the emission potential for the FutureGen Project. Table 3-12 summarizes the air emissions estimated for these proposed power plants. Should the projects go forward, they would release tens of thousands of tons of criteria pollutants into the atmosphere, which could adversely affect air quality, though the extent is unknown. The FutureGen Project would contribute up to 5 percent and 1.7 percent of the cumulative NO<sub>2</sub> and SO<sub>2</sub> emissions, respectively, and up to 1.1 percent of cumulative CO emissions. Because the Jewett Site is in an attainment area that is substantially below the NAAQS for these pollutants (see Section 6.2), the cumulative impact from NO<sub>2</sub>, SO<sub>2</sub>, and CO emissions from the FutureGen Project would not be expected to cause exceedance of NAAQS. Ambient concentrations of PM<sub>2.5</sub> *may be* much closer to the NAAQS (*based on the closest PM monitoring station, which is located near Houston, a more urban area*), and cumulative air emission from proposed facilities in the region would likely cause the PM<sub>2.5</sub> concentrations to increase. Detailed modeling of all the proposed sources, along with the existing sources and local air quality data, would be required to estimate more accurately whether the cumulative impact of the proposed sources could result in the PM<sub>2.5</sub> standard being exceeded. However, the FutureGen Project would represent less than 1.5 percent of the estimated future emissions of PM within 50 miles (80.5 kilometers) of Jewett.

While the FutureGen Project would emit pollutants, the levels would be very small, and future air quality degradation in the region would be dominated by the other proposed power plants. *These proposed power plants (already in the permitting stage) and all other proposed sources of air pollutants would be expected to consume PSD increments and may affect emission levels allowed for projects*

*permitted at a later time, including the FutureGen Project.*

**Table 3-12. Air Emissions Expected for Proposed Coal-Fueled Power Plants near Jewett**

Project	MW	NO <sub>2</sub> (tpy [mtpy])	CO (tpy [mtpy])	VOC (tpy [mtpy])	PM/PM <sub>10</sub> (tpy [mtpy])	SO <sub>2</sub> (tpy [mtpy])
Oak Grove, Lignite <sup>1</sup>	1,600	6,320 (5,733)	26,790 (24,303)	352 (319.3)	3,171 (2,877)	15,079 (13,679)
Limestone 3, Lignite <sup>2</sup>	800	1,752 (1,589)	13,395 (12,152)	176 (159.7)	1,402 (1,272)	2,103 (1,908)
Sandow 5, Lignite <sup>2</sup>	434	2,593 (2,352)	7,267 (6,593)	95 (86.2)	1,037 (940.8)	5,186 (4,705)
Sandy Creek, PRB <sup>2</sup>	600	1,793 (1,627)	4,276 (3,879)	104 (94.3)	1,434 (1,301)	3,585 (3,252)
Twin Oaks Power 3, Lignite <sup>2</sup>	600	2,037 (1,848)	4,276 (3,879)	104 (94.3)	1,018 (923.5)	5,818 (5,278)
<b>Total – Planned Power Plants</b>	<b>4,034</b>	<b>14,495 (13,149)</b>	<b>56,004 (50,806)</b>	<b>831 (754)</b>	<b>8,062 (7,314)</b>	<b>31,771 (28,822)</b>
FutureGen - max case	275	758 (687.6)	611 (554.3)	30 (27.2)	111 (100.7)	543 (492.6)
- target case		326 (295.7)	n/a <sup>3</sup>	n/a <sup>3</sup>	33 (29.9)	212 (192.3)
Total - max case		<b>15,253 (13,837)</b>	<b>56,615 (51,360)</b>	<b>861 (781)</b>	<b>8,173 (7,415)</b>	<b>32,314 (29,315)</b>
- target case		<b>14,821 (13,445)</b>	n/a <sup>3</sup>	n/a <sup>3</sup>	<b>8,095 (7,344)</b>	<b>31,983 (29,014)</b>
FutureGen Percent of Total - max case		<b>5.0 percent</b>	<b>1.1 percent</b>	<b>3.5 percent</b>	<b>1.4 percent</b>	<b>1.7 percent</b>
- target case		<b>2.2 percent</b>	n/a <sup>3</sup>	n/a <sup>3</sup>	<b>0.4 percent</b>	<b>0.7 percent</b>

<sup>1</sup> TXU, 2007.

<sup>2</sup> PCTO and SEED, 2006. CO and VOCs were estimated based on TXU project values, scaled by MW size and type of coal.

<sup>3</sup> n/a indicates that emission targets for these pollutants have not been established.

MW = megawatts; tpy = tons per year; mtpy = metric tons per year.

Based on a nominal rate of 2 pounds (0.9 kilograms) of CO<sub>2</sub> generated for each kilowatt-hour for a pulverized coal power plant (EPA, 2006), power plants listed in Table 3-12 would emit approximately **35 million tons (31.7 MMT)** of CO<sub>2</sub> annually.

In addition to the potential for cumulative air quality impacts, activities associated with the construction and operation of a new 800-MW unit at the adjacent NRG Limestone Electric Generating Station could result in additional traffic and noise in the immediate vicinity of the Jewett Site. However,

it is expected that these increases would be localized, and because there are few receptors in this area and traffic conditions are generally acceptable, these impacts are not expected to be severe.

There are several transportation projects in the area of the Jewett Site. Most notably, the Texas Westmoreland Coal Company plans to relocate a section of FM 39 and the current train overpass to reclaimed land to facilitate the continuation of mining operations. This relocation is scheduled to begin in 2007 and be completed in approximately one year (FG Alliance, 2006c). Therefore, the FutureGen Project would have minimal impact on the relocation of FM 39.

The Trans-Texas Corridor 35 could cause impacts during its construction in the form of regional traffic delays and detours. However, after its completion, this corridor would alleviate traffic and have a net positive impact on transportation in the region. The initiative to move freight lines away from heavily populated areas (discussed in Section 3.3.2.2), such as Dallas to the north, Houston to the south, and Austin to the southwest, may cause temporary rail delays during construction, but would have long-term positive impacts on rail shipments in the region.

As indicated in Section 3.3.2.2, there are numerous opportunities for EOR in the Jewett ROI. Over time, it is possible that projects could emerge as a result of new CO<sub>2</sub> streams in the region. The potential cumulative impacts resulting from any EOR undertakings would principally be related to construction of the necessary infrastructure to transport the CO<sub>2</sub> to the injection location, as well as the activities that would occur at injection and recovery sites.

Water availability in Texas is an overall concern in terms of cumulative impacts of new projects. The water required by other projects in the ROI (such as the proposed power plants) and their sources are unknown, but could reduce water availability in the region to some extent. *The proposed Jewett site would be located in Limestone, Freestone and Leon counties, where each county lies within a different water planning region (G, C, H respectively). Based on state predictions of water use through 2060, water demand would increase in these planning areas by 38, 87 and 47 percent respectively, attributed largely to municipal demand (resident population growth). Across these three planning areas, existing surface water supplies would decrease by 4 percent and groundwater supplies would decrease by 17 percent by 2060. In planning region G, the Carrizo-Wilcox aquifer water supply would decrease by 13 percent by 2060 (TWDB, 2006).*

The withdrawal of *3.1 billion gallons (4.9 billion liters) or 4,000 acre-feet of water annually* for the FutureGen Project could affect groundwater supplies in the future. *Based on the 2007 State Water Plan, the FutureGen Project would consume approximately 4 percent of the Carrizo-Wilcox Aquifer annual supply in water planning region G.* The Jewett Site would have an on-site wastewater treatment facility and it is probable that the effluent would be recycled into the power plant. This would be consistent with the recommendations of the 2007 State Water Plan. Consistent with the state's effort to restore the Trinity River, the FutureGen Project would use BMPs during construction of the CO<sub>2</sub> pipeline and sequestration facilities to minimize degradation of the river's water quality.

The FutureGen Project could result in the future clustering of other industries on or around the selected site. For the Jewett Site, surrounded by existing industry with few residences nearby, this change would not be considered intrusive. The clustering of industry would introduce new air emission sources, truck and rail traffic, and noise that would degrade the environment to some degree. However, such development would be consistent with the Texas Industry Cluster Initiative (Texas Office of the Governor, 2004b).

### 3.3.4.3 Odessa

There is only one major fossil fuel energy project planned within the ROI for the Odessa Site, and there are few other projects in the vicinity that have the potential to result in cumulative impacts. The natural gas-fired power plant currently under construction is 19 miles (30.6 kilometers) from the Odessa Site, and no cumulative air quality impacts are expected from this project and the FutureGen Project.

In general, west Texas has favorable conditions for wind energy. A wind farm is proposed approximately 50 miles (80.5 kilometers) east of the site and wind farms are located within a few miles of the Odessa Sequestration Site. Based on the state's Energy Diversification Plan and clean energy law, future wind farms near the Odessa Site are highly likely. These projects would provide clean, renewable energy that could possibly replace the energy provided by aging fossil fuel power plants in the future.

A proposal for a new rail corridor between the U.S. and Mexico would connect the Midland-Odessa area of west Texas to the South Orient rail line. Should this project go forward, it may expand freight routes in the area around the proposed Odessa Site, allowing for greater flexibility and lower cost of deliveries to and from the plant site.

As indicated in Section 3.3.2.2, there are numerous opportunities for EOR in the Odessa ROI. Over time, it is possible that projects could emerge as a result of new CO<sub>2</sub> streams in the region. The potential cumulative impacts resulting from any EOR undertakings would principally be related to construction of the necessary infrastructure to transport the CO<sub>2</sub> to the injection location, as well as the activities that would occur at injection and recovery sites. It is expected that geologic sequestration research and projects would also continue in the ROI, including those under DOE's Carbon Sequestration Program. Due to the abundant land area and suitable geologic conditions, the FutureGen Project would not limit future sequestration activities in the region.

Water availability in west Texas is a chief concern in terms of cumulative impacts of new projects. Although there are not many large projects proposed within the ROI that would consume water, the withdrawal of **3.1 billion gallons (4.9 billion liters) or 4,000 acre-feet of water annually** for the FutureGen Project could affect future groundwater supplies. While the Texas Water Development Board has indicated that a number of existing well fields provide sufficient water for the FutureGen Project, regional population and industry growth over time may strain water supplies in the future. ***The proposed Odessa FutureGen site is located in water planning region F, where projected water demand between 2010 and 2050 is expected to increase by only 2 percent. Approximately 75 percent of current water demand is associated with agricultural irrigation and 78 percent of the region's existing water supply consists of groundwater from the Ogallala, Edwards-Trinity, Trinity and Pecos Valley aquifers. Water conservation strategies include advanced irrigation methods and reuse of treated municipal wastewater. The region is also looking to desalinate brackish groundwater and add new well fields for Midland and San Angelo (TWDB, 2006). Based on existing groundwater supplies in the region (all aquifers), the FutureGen Project would use approximately 1 percent of the annual groundwater supply in the region.***

The FutureGen Project could result in the future clustering of other industries on or around the selected site. For the Odessa Site, which is surrounded by existing industry and oil and gas fields, this change would not be considered intrusive. The clustering of industry would introduce new air emission sources, truck and rail traffic, and noise that would degrade the environment to some degree. However, such development would be consistent with the Texas Industry Cluster Initiative (Texas Office of the Governor, 2004b).

### **3.4 UNAVOIDABLE ADVERSE IMPACTS, MITIGATION MEASURES, AND BEST MANAGEMENT PRACTICES**

For all environmental resources, the mitigation of potential adverse impacts from project activities would be achieved through various mitigation measures and the implementation of BMPs that are generally required by permitting processes and other federal, state, or municipal regulations and ordinances. Table 3-13 outlines specific mitigation measures that the Alliance may use to offset potential adverse impacts from the FutureGen Project. Table 3-14 describes BMPs that the Alliance could implement to avoid reasonably foreseeable adverse impacts to each resource area.

**Table 3-13. Possible Mitigation Measures for the FutureGen Project**

Resource Area	Unavoidable Adverse Impacts	Possible Mitigation Measures
<b>Air Quality</b>	<p><b><u>Construction/Operations:</u></b></p> <ul style="list-style-type: none"> <li>The FutureGen Project would result in emissions of criteria and hazardous air pollutants, including those from unplanned restarts and flaring events. During these events, intermittent increases of steady-state emissions would occur when process gases are flared for a short period of time to restart the operations. It is not possible to predict the number and nature of unplanned restarts due to plant upsets that could occur. There would be concentrations of pollutants resulting in short-term impacts; however, the peak concentration of pollutants emitted would be within a 2-mile (3.2-kilometer) radius at any of the proposed sites. Residences within that radius would be most affected during unplanned restart and flaring events.</li> </ul>	<p><b><u>Operations:</u></b></p> <ul style="list-style-type: none"> <li>The FutureGen Project would employ the most advanced particulate control technologies available. Concentration of particulates in the cleaned syngas would be about 0.1 to 1 parts per million by weight, far lower than current environmental standards.</li> <li>The project would use the most advanced combustion control technologies for NO<sub>x</sub> available when the turbine would be put into service. SCR is considered a possible option if suitable conditions exist to minimize potential interference by sulfur species.</li> <li>The project would include a water-gas-shift reactor, plus an AGR system which would capture and remove acidic gases such as CO and H<sub>2</sub>S.</li> </ul>
<b>Climate and Meteorology</b>	<p><b><u>Construction/Operations:</u></b></p> <ul style="list-style-type: none"> <li>Construction and operation of the proposed facility would not cause any unavoidable adverse impacts relevant to climate and meteorology.</li> </ul>	<p><b><u>Construction/Operations:</u></b></p> <ul style="list-style-type: none"> <li>No mitigation measures warranted.</li> </ul>
<b>Geology</b>	<p><b><u>Construction/Operations:</u></b></p> <ul style="list-style-type: none"> <li>No unavoidable adverse impacts would occur to geological resources. Reservoir space would be used to store the injected CO<sub>2</sub>.</li> <li>May cause local adverse impacts to and loss of microbial communities that live in rock where CO<sub>2</sub> would be injected.</li> </ul>	<p><b><u>Construction/Operations:</u></b></p> <ul style="list-style-type: none"> <li>No mitigation measures warranted.</li> </ul>
<b>Physiography and Soils</b>	<p><b><u>Construction:</u></b></p> <ul style="list-style-type: none"> <li>Unavoidable soil disturbance at the proposed power plant site would result in permanent removal or displacement of soils on up to 200 acres (81 hectares); this includes prime farmland soils (Mattoon and Tuscola). Temporary disturbances to soil would occur along proposed utility corridors. BMPs would prevent any additional adverse impacts.</li> </ul> <p><b><u>Operations:</u></b></p> <ul style="list-style-type: none"> <li>No unavoidable adverse impacts would occur to physiography and soils. BMPs would be used to minimize impacts.</li> </ul>	<p><b><u>Construction:</u></b></p> <ul style="list-style-type: none"> <li>Prime farmland soils (Mattoon and Tuscola) could be stockpiled and hauled off site during construction for other agricultural uses.</li> </ul> <p><b><u>Operations:</u></b></p> <ul style="list-style-type: none"> <li>No mitigation measures warranted.</li> </ul>

**Table 3-13. Possible Mitigation Measures for the FutureGen Project**

Resource Area	Unavoidable Adverse Impacts	Possible Mitigation Measures
<b>Groundwater</b>	<p><b><u>Construction/Operations:</u></b></p> <ul style="list-style-type: none"> <li>No unavoidable adverse impacts would occur to groundwater resources. BMPs would be used to minimize impacts.</li> <li>Some groundwater use would occur in Tuscola, Jewett, and Odessa. Impacts of water use are likely to be more important for the Odessa site.</li> </ul>	<p><b><u>Construction/Operations:</u></b></p> <ul style="list-style-type: none"> <li>No mitigation measures warranted.</li> </ul>
<b>Surface Water</b>	<p><b><u>Construction/Operations:</u></b></p> <ul style="list-style-type: none"> <li>No unavoidable adverse impacts would occur to surface water resources. BMPs would be used to minimize impacts.</li> <li>Some surface water use would occur <b>at</b> Tuscola.</li> </ul>	<p><b><u>Construction/Operations:</u></b></p> <ul style="list-style-type: none"> <li>No mitigation measures warranted.</li> </ul>
<b>Wetlands and Floodplains</b>	<p><b><u>Construction:</u></b></p> <ul style="list-style-type: none"> <li>Construction of the proposed facility could result in unavoidable temporary impacts to wetlands along utility corridors. BMPs should prevent any adverse impacts from construction and operation of the FutureGen Project.</li> </ul> <p><b><u>Operations:</u></b></p> <ul style="list-style-type: none"> <li>No unavoidable adverse impacts would occur to wetlands or floodplains. BMPs would be used to minimize impacts.</li> </ul>	<p><b><u>Construction:</u></b></p> <ul style="list-style-type: none"> <li>Site design could avoid impacts to wetlands. New utility corridors could be located to avoid some wetlands.</li> <li>Section 404 permits would be obtained for jurisdictional water-body and wetland alternations. As a permit condition, mitigation of wetland impacts would be in the form of direct replacement or other approved U.S. Army Corps of Engineers (USACE) and state mitigation requirements. Typical mitigation ratios for unavoidable impacts to wetlands would be 1:1 for open water and emergent wetlands, 1.5:1 for shrub wetlands, and up to 2:1 for forested wetlands.</li> <li>Directional drilling of utilities in areas where mitigation is not required by the USACE would further reduce impacts to wetland resources.</li> </ul> <p><b><u>Operations:</u></b></p> <ul style="list-style-type: none"> <li>No mitigation measures warranted.</li> </ul>

**Table 3-13. Possible Mitigation Measures for the FutureGen Project**

Resource Area	Unavoidable Adverse Impacts	Possible Mitigation Measures
<p><b>Biological Resources</b></p>	<p><b>Construction:</b></p> <ul style="list-style-type: none"> <li>Permanent unavoidable land disturbance at the proposed power plant site would result in permanent habitat loss of up to 200 acres (81 hectares). Temporary disturbances to additional aquatic and terrestrial habitats would occur along proposed utility corridors. BMPs should prevent any adverse impacts to these terrestrial and aquatic habitats.</li> <li>No known occurrences of threatened and endangered species; however, the potential exists for an adverse impact to threatened or endangered species within each of the proposed FutureGen Project sites. Surveys for these species before construction would determine if they occur in the area. BMPs and coordination with state and federal agencies should prevent any adverse impacts.</li> </ul> <p><b>Operations:</b></p> <ul style="list-style-type: none"> <li>No unavoidable adverse impacts would occur to biological resources. BMPs would be used to minimize impacts.</li> </ul>	<p><b>Construction:</b></p> <ul style="list-style-type: none"> <li>Mitigation for federal endangered species, if necessary, would be defined during consultation with the U.S. Fish and Wildlife Service and could include passive measures such as construction timing outside of critical breeding periods, or more aggressive measures such as complete avoidance of impacts.</li> </ul> <p><b>Operations:</b></p> <ul style="list-style-type: none"> <li>No mitigation measures warranted.</li> </ul>
<p><b>Cultural Resources</b></p>	<p><b>Construction:</b></p> <ul style="list-style-type: none"> <li>Although there are no known areas of cultural significance, the potential exists for an adverse impact to cultural resources (Jewett and Odessa CO<sub>2</sub> corridors, Tuscola electrical transmission corridor). Archaeological surveys would determine location of any cultural resources and the possible extent of impact. Construction of the proposed facility is not anticipated to have any unavoidable adverse impacts relevant to cultural resources.</li> <li>Consultation with Native American tribes was initiated; no tribes have requested involvement, however, coordination is ongoing. The potential of unavoidable adverse impacts would be resolved once consultation is complete.</li> </ul> <p><b>Operations:</b></p> <ul style="list-style-type: none"> <li>No unavoidable adverse impacts would occur to cultural resources. BMPs would be used to minimize impacts.</li> </ul>	<p><b>Construction:</b></p> <ul style="list-style-type: none"> <li>Consultation with the State Historic Preservation Officer (SHPO) for any new unforeseen areas of construction or ground disturbance not included within the EIS would be completed before construction to determine the need for cultural resource investigations and any appropriate mitigation measures.</li> <li>Required management and mitigation measures regarding traditional cultural properties are unknown until consultation with Native American tribes is complete.</li> </ul> <p><b>Operations:</b></p> <ul style="list-style-type: none"> <li>No mitigation measures warranted.</li> </ul>

**Table 3-13. Possible Mitigation Measures for the FutureGen Project**

Resource Area	Unavoidable Adverse Impacts	Possible Mitigation Measures
<b>Land Use</b>	<p><b>Construction:</b></p> <ul style="list-style-type: none"> <li>• Direct unavoidable impact due to displacement of oil and gas wells (Odessa and Jewett).</li> <li>• Direct impact to any residential property and prime farmland (Mattoon and Tuscola) located adjacent to the power plant site; introduces industrial construction adjacent to residential property. BMPs used for aesthetics, noise, and traffic should minimize any adverse impacts on adjacent land use resulting from project construction.</li> </ul> <p><b>Operations:</b></p> <ul style="list-style-type: none"> <li>• No unavoidable adverse impacts would occur to land use. BMPs would be used to minimize impacts.</li> </ul>	<p><b>Construction:</b></p> <ul style="list-style-type: none"> <li>• Displaced oil and gas wells could be relocated.</li> </ul> <p><b>Operations:</b></p> <ul style="list-style-type: none"> <li>• No mitigation measures warranted.</li> <li>• FutureGen Project land that is not used for project purposes could be leased for agricultural use.</li> </ul>
<b>Aesthetics</b>	<p><b>Construction/Operations:</b></p> <ul style="list-style-type: none"> <li>• The proposed power plant (Mattoon and Tuscola) would cause a major unavoidable visual intrusion to residences within a 1-mile (1.6-kilometer) radius of the site.</li> <li>• Moderate unavoidable visual intrusion would occur for two residences near the Odessa site due to the presence of other industrial facilities that are visible in the general area and the FutureGen facility.</li> </ul>	<p><b>Construction/Operations:</b></p> <p>Potential mitigation measures that would reduce the aesthetic impacts of the facility include:</p> <ul style="list-style-type: none"> <li>• Enclosing some of the more “industrial” components of the plant in buildings.</li> <li>• Providing landscaping around the perimeter of the plant site to partially screen the plant from nearby residences and those passing by on the adjacent roads.</li> <li>• Selecting single-pole transmission towers to reduce the visual profile of the transmission towers.</li> <li>• Lighting design (e.g., luminaries with controlled candela distributions, well-shielded or hooded lighting, and directional lighting) could minimize potential for light pollution.</li> </ul>
<b>Transportation and Traffic</b>	<p><b>Construction:</b></p> <ul style="list-style-type: none"> <li>• Construction would create temporary localized adverse impacts due to the presence of additional trucks. BMPs should minimize additional impacts.</li> <li>• Temporary unavoidable impacts would occur to rail operations during construction of a new underpass (Odessa).</li> </ul> <p><b>Operations:</b></p> <ul style="list-style-type: none"> <li>• Changes to traffic signal timings may be required at ramp intersections to accommodate changes in the turning volumes.</li> </ul>	<p><b>Construction:</b></p> <ul style="list-style-type: none"> <li>• Truck traffic impacts would be mitigated through the use of signed truck routes to the proposed power plant site. Continued use of these routes during operations would reduce adverse impact.</li> <li>• At a minimum, trained rail construction flaggers would be required at all times during construction to accommodate traffic flow (Odessa).</li> </ul> <p><b>Operations:</b></p> <ul style="list-style-type: none"> <li>• No mitigation measures warranted.</li> </ul>

**Table 3-13. Possible Mitigation Measures for the FutureGen Project**

Resource Area	Unavoidable Adverse Impacts	Possible Mitigation Measures
<b>Noise and Vibration</b>	<p><b>Construction:</b></p> <ul style="list-style-type: none"> <li>Construction would result in unavoidable temporary elevated noise impacts at the power plant site, increasing ambient noise levels at nearby receptors. BMPs would reduce impacts.</li> </ul> <p><b>Operations:</b></p> <ul style="list-style-type: none"> <li>Operational traffic activities within the power plant site would result in unavoidable noise increases at nearby residences (Mattoon and Tuscola). BMPs would reduce impacts.</li> <li>Noise and vibration from train rail car shakers could generate noise levels up to 118 dBA.</li> <li>Numerous power plant components could generate increases in ambient noise levels and some could generate vibrations.</li> </ul>	<p><b>Construction:</b></p> <ul style="list-style-type: none"> <li>Noise mitigation measures to limit the number of heavy trucks passing by residential receptors during construction would include diverting truck trips, scheduling more deliveries on rail, or purchasing the impacted property (Mattoon and Tuscola).</li> </ul> <p><b>Operations:</b></p> <ul style="list-style-type: none"> <li>Sound enclosures, <i>barrier walls</i>, <i>earthen berms</i>, or dampening devices could be used whenever possible. In addition, alternate site configurations could be considered in order to position noise-producing equipment away from the impacted receptors (Mattoon and Tuscola).</li> <li>Design of coal handling equipment would be evaluated during final design to reduce noise impacts to adjacent receptors.</li> </ul>
<b>Utility Systems</b>	<p><b>Construction/Operations:</b></p> <ul style="list-style-type: none"> <li>No unavoidable adverse impacts would occur to utility systems. BMPs would be used to minimize impacts.</li> </ul>	<p><b>Construction/Operations:</b></p> <ul style="list-style-type: none"> <li>No mitigation measures warranted.</li> </ul>
<b>Materials and Waste Management</b>	<p><b>Construction/Operations:</b></p> <ul style="list-style-type: none"> <li>No unavoidable adverse impacts would occur to materials and waste management. BMPs would be used to minimize impacts.</li> </ul>	<p><b>Construction/Operations:</b></p> <ul style="list-style-type: none"> <li>No mitigation measures warranted.</li> </ul>
<b>Human Health, Safety, and Accidents</b>	<p><b>Construction/Operations:</b></p> <ul style="list-style-type: none"> <li>Unavoidable adverse impacts to human health and safety, although unlikely, could result from various types of accidents, sabotage and terrorism acts, ranging from small pipeline leaks to, in the worst case, a power plant explosion. Two separate risk studies were completed to identify and evaluate the risks of most importance. The results of the risk assessments would help planners and designers to reduce these risks during the planning, designing, construction, and operation of FutureGen.</li> <li>The potential for large spills of ammonia with adverse impacts to human health would be low.</li> </ul>	<p><b>Construction/Operations:</b></p> <ul style="list-style-type: none"> <li><b><i>Design the power plant to provide: safe egress from all confined areas; adequate ventilation; fire protection; pressure relief to safe locations; and a real-time monitoring for hazardous chemicals with an alarm system. Institute safety training and evacuation policies to address accidents.</i></b></li> <li>Design the CO<sub>2</sub> pipeline with automatic emergency shut-off valves spaced at 5-mile (8.0-kilometer) intervals to reduce the quantity of gases that could be released in the event of a pipeline rupture. The affected area associated with a release event would be reduced approximately linearly with the reduction in the distance between the shut-off valves. Automatic shut-off valves could be placed at 3-mile (4.8-kilometer) or 1-mile (1.6-kilometer) intervals near populated areas to further reduce the quantity of gases that could be released from a pipeline rupture or puncture.</li> <li>Thicker pipe walls or armored pipe guards could be used at water</li> </ul>

**Table 3-13. Possible Mitigation Measures for the FutureGen Project**

Resource Area	Unavoidable Adverse Impacts	Possible Mitigation Measures
		<p>body and road crossings.</p> <ul style="list-style-type: none"> <li>• The Risk Assessment associated with the preparation of the EIS delineated potential areas affected by pipeline ruptures and punctures. Set-back areas could be specified for populated areas. Pipelines could also be routed to maximize the distance to populated areas and sensitive receptors.</li> <li>• Well head and pipeline protective barriers could be installed (e.g., chain-link fences and posts or barricades).</li> <li>• The pipeline would be buried to minimize accidental damage. Deeper burial of the pipeline (deeper than 3 feet [0.9 meters]) in areas with higher population densities could reduce the risk of damage caused by digging and trenching.</li> <li>• Bleed valves could be added to control location and direction of releases should a puncture occur. The valves may be able to be designed to maximize the production of dry ice, snow, which reduces the peak concentrations of pipeline gases.</li> <li>• The use of in-line inspection vehicles or intelligence pigs can detect very early evidence of corrosion. Increased monitoring for corrosion and frequent inspections and clean-outs could be implemented in populated areas, in addition to the Supervisory Control and Data Acquisition monitoring of pipeline pressure, temperature, and flow rate.</li> <li>• The quantity of ammonia stored on site could be decreased from a 30-day supply to a 2-week supply using two smaller tanks.</li> <li>• The transfers from the tanker truck to the pipeline leading to the tank could be conducted within a portable secondary containment system.</li> <li>• Inspection would be conducted of the tanker truck and connecting pipe valves.</li> </ul>
<p><b>Community Services</b></p>	<p><b><u>Construction/Operations:</u></b></p> <ul style="list-style-type: none"> <li>• No unavoidable adverse impacts would occur to community services. BMPs would be used to minimize impacts.</li> </ul>	<p><b><u>Construction/Operations:</u></b></p> <ul style="list-style-type: none"> <li>• No mitigation measures warranted.</li> </ul>

**Table 3-13. Possible Mitigation Measures for the FutureGen Project**

Resource Area	Unavoidable Adverse Impacts	Possible Mitigation Measures
<b>Socioeconomics</b>	<p><b><u>Construction:</u></b></p> <ul style="list-style-type: none"> <li>Construction of the proposed facility would have unavoidable adverse impacts on residential properties located within, and adjacent to, the proposed power plant site property boundaries (Mattoon and Tuscola). BMPs should prevent any additional adverse impacts from construction and operations of the FutureGen Project.</li> </ul> <p><b><u>Operations:</u></b></p> <ul style="list-style-type: none"> <li>Operation of the facility would have unavoidable adverse impacts on residents located very near the proposed power plant (Mattoon and Tuscola) through a potential unobstructed view of the facility, noise, and perhaps some dust or vibrations. The potential socioeconomic impact could be a reduction in property values for some homes very near or adjacent to the power plant.</li> </ul>	<p><b><u>Construction:</u></b></p> <ul style="list-style-type: none"> <li>Purchase of the residences (two at Mattoon; three at Tuscola) would mitigate financial loss or other long-term impacts to residents from construction and operation of the FutureGen Project.</li> <li></li> </ul> <p><b><u>Operations:</u></b></p> <ul style="list-style-type: none"> <li>See mitigation measures under aesthetics and noise.</li> </ul>
<b>Environmental Justice</b>	<p><b><u>Construction/Operations:</u></b></p> <ul style="list-style-type: none"> <li>Construction and operation of the proposed facility are not anticipated to have any unavoidable adverse impacts related to environmental justice.</li> </ul>	<p><b><u>Construction/Operations:</u></b></p> <ul style="list-style-type: none"> <li>No mitigation measures warranted.</li> </ul>

**Table 3-14. Possible BMPs to Minimize Potential Impacts from the FutureGen Project**

<b>Resource Area</b>	<b>Possible BMPs<sup>1</sup></b>
<b>Air Quality</b>	<ul style="list-style-type: none"> <li>• Water sprays from trucks could be used to control fugitive dust by wetting exposed soils during construction activities.</li> <li>• A phased construction period could be utilized to minimize vehicular emissions.</li> <li>• Plugging of identified abandoned wells within the injection area could be performed before the start of CO<sub>2</sub> injection operations, and plugging of injection wells at the conclusion of injection operations would be undertaken to prevent leakage of sequestered CO<sub>2</sub>.</li> <li>• Trucks could be covered, equipment properly maintained, and the amount of vehicle trips and idling limited to minimize vehicular emissions.</li> </ul>
<b>Climate and Meteorology</b>	<ul style="list-style-type: none"> <li>• The facility would be designed to withstand high winds and extreme temperatures.</li> </ul>
<b>Geology</b>	<ul style="list-style-type: none"> <li>• Maintenance and monitoring of CO<sub>2</sub> injection wells would be performed to ensure they are operating properly.</li> <li>• Periodic mechanical integrity testing of injection well casings, tubing, and packers would be performed to prevent fluid movement through vertical channels adjacent to the injection well bores, and to detect any unexpected migration of CO<sub>2</sub> at the injection wells.</li> <li>• Monitoring of active or inactive wells that penetrate the primary seal within the subsurface ROI, including sealed and abandoned wells, would be conducted to detect leakage of CO<sub>2</sub> through these potential conduits.</li> <li>• Monitoring for microseismic events and increased pressures due to CO<sub>2</sub> injection would be performed to identify conditions that could cause fracturing of the sequestration formation and CO<sub>2</sub> escape.</li> <li>• A monitoring and tracking system for the CO<sub>2</sub> plume would be used to detect any unexpected migration of the CO<sub>2</sub> plume.</li> <li>• Remediation options for typical leakage scenarios at the CO<sub>2</sub> injection wells or abandoned wells would be developed before plant startup so that pipe ruptures, blow-outs, and leaks can be quickly identified and addressed.</li> </ul>
<b>Physiography and Soils</b>	<ul style="list-style-type: none"> <li>• Silt fences, sand bags, straw bales, trench plugs, and interceptor dikes would be utilized during construction to minimize soil erosion.</li> <li>• Soil wetting and phased construction would be utilized to reduce soil blowing.</li> <li>• Topsoil segregation during construction would minimize soil structure damage and allow the soil to be placed back into pre-construction uses (i.e., crop production).</li> <li>• Soils would be stabilized through post-construction revegetation and mulching of temporarily disturbed areas.</li> <li>• Permanently removed vegetation would be recycled to the extent practicable (e.g., mulch, pulp and paper products) to maximize re-utilization of these permanently lost resources.</li> <li>• Established Occupational Safety and Health Administration (OSHA) and EPA guidelines for labeling, segregation, and storage of hazardous materials would be used to minimize soil contamination from spills and handling.</li> </ul>

**Table 3-14. Possible BMPs to Minimize Potential Impacts from the FutureGen Project**

Resource Area	Possible BMPs <sup>1</sup>
<b>Groundwater</b>	<ul style="list-style-type: none"> <li>• A Spill Prevention, Control, and Countermeasures Plan would be developed and implemented to minimize the potential for groundwater contamination due to uncontrolled or unmitigated releases of hazardous materials.</li> <li>• Monitoring systems would be installed at the sequestration site and areas within the subsurface ROI to detect CO<sub>2</sub> migration before it can come in contact with overlying groundwater resources.</li> <li>• Soil gas monitoring would be used to detect CO<sub>2</sub> migration into soils.</li> <li>• The lateral and vertical extent of the CO<sub>2</sub> plume would be monitored to detect any CO<sub>2</sub> migration beyond the sequestration reservoir.</li> </ul>
<b>Surface Water</b>	<ul style="list-style-type: none"> <li>• Engineering designs and construction techniques, required as part of the NPDES Permit and Stormwater Pollution Prevention Plan (SWPPP), would minimize surface water quality impacts.</li> <li>• Site design would incorporate stormwater treatment, effectively eliminating water quality impacts from contaminated stormwater runoff.</li> <li>• Silt fencing, storm sewer inlet/outlet protection, and use of sediment basins would be used to reduce the potential for sedimentation, turbidity, and runoff during construction.</li> <li>• Directional drilling under water bodies during underground utility pipeline construction would help reduce sedimentation, turbidity, and interruption of surface water flows.</li> <li>• Perpendicular crossings of streams within locations that could not be directionally drilled would reduce the linear impacts of construction.</li> <li>• Soils near surface water bodies would be stabilized through post-construction revegetation and mulching of temporarily disturbed areas to reduce additional sedimentation and runoff.</li> <li>• <b><i>Hydrostatic test water would be obtained from bodies of water with sufficient volume and flow to supply required volumes for hydrostatic testing without significantly affecting downstream flow.</i></b></li> </ul>
<b>Wetlands and Floodplains</b>	<ul style="list-style-type: none"> <li>• Engineering designs and construction techniques, required as part of the NPDES Permit and SWPPP, would minimize surface water quality impacts.</li> <li>• Silt fencing, hay bales, and other sediment and erosion control mechanisms would be used to minimize sedimentation into wetlands adjacent to construction sites.</li> <li>• Existing ROWs would be used whenever possible to limit impacts to previously disturbed wetlands or avoid wetland impacts.</li> <li>• Construction activities would be scheduled to occur during drier months to minimize the potential for impacts to floodplain soils and topographical features.</li> <li>• Equipment movement through and near wetland areas would be minimized to reduce the magnitude of temporary impacts.</li> <li>• The use of herbicides within or adjacent to wetlands would be limited to those approved for use in wetland areas.</li> <li>• Directional drilling would be used to reduce or avoid impacts to wetlands during pipeline construction.</li> </ul>

**Table 3-14. Possible BMPs to Minimize Potential Impacts from the FutureGen Project**

Resource Area	Possible BMPs <sup>1</sup>
<b>Biological Resources</b>	<ul style="list-style-type: none"> <li>• Existing ROWs would be used whenever possible to confine impacts to previously disturbed terrestrial and aquatic habitats.</li> <li>• Standard pipeline construction practices, including silt fencing, hay bales, and other sediment and erosion control mechanisms, would be used to minimize impacts to aquatic habitat and species.</li> <li>• A soil erosion and sedimentation control plan would be implemented as required by applicable permits.</li> <li>• Equipment movement through and near riparian corridors would be minimized to reduce the magnitude of temporary impacts.</li> <li>• Construction activities would be scheduled for drier months to minimize the potential for impacts to aquatic habitats.</li> <li>• Directional drilling would be used to avoid impacts to aquatic habitat during pipeline construction.</li> <li>• Post-construction revegetation and mulching of temporarily disturbed areas would be conducted to decrease the recovery time for disturbed habitats.</li> <li>• <b><i>Land clearing activities would be avoided during the peak nesting season (April 1-July 31) in order to avoid impacts to migratory birds. Additionally, surveys for raptors would be conducted if necessary.</i></b></li> </ul>
<b>Cultural Resources</b>	<ul style="list-style-type: none"> <li>• If artifacts or other evidence of cultural resources were discovered during construction, operations in that area would cease and the area would be secured until the SHPO could be consulted regarding the discovery.</li> <li>• Consultation would occur with the caretakers of the cemetery located in the CO<sub>2</sub> pipeline corridor at the Jewett Site to determine BMPs needed to ensure that the cemetery remains undisturbed. At a minimum, the boundaries of the cemetery would be clearly marked and a buffer of 100 feet (30.5 meters) in all directions around the cemetery would be established within which no construction activity, including vehicular access or parking, would be allowed.</li> </ul>
<b>Land Use</b>	<ul style="list-style-type: none"> <li>• Careful selection of utility corridor routing during final design, particularly underground water and CO<sub>2</sub> lines, would be undertaken to minimize the potential for conflicts with the locations of existing oil, gas, and water wells.</li> <li>• Appropriate shoring of utility trenches and general BMPs during construction would minimize land use impacts throughout the corridors, especially in those areas where prime farmland exists.</li> <li>• Where utility corridors cross cropland (Mattoon and Tuscola), separation of topsoil during trenching and return of the topsoil to the top of the filled-in trench would be done to help maintain the productivity of the agricultural land following construction.</li> <li>• Farmland drain tiles on the Tuscola and Mattoon sites would be carefully replaced where they would be impacted by utility corridor construction.</li> </ul>
<b>Aesthetics</b>	<ul style="list-style-type: none"> <li>• Grading of stockpiled topsoil and reestablishment of native vegetation would be used to minimize landscape scarring after construction is complete.</li> </ul>
<b>Transportation and Traffic</b>	<ul style="list-style-type: none"> <li>• Traffic signal timing could be changed along designated corridors to accommodate necessary construction traffic.</li> <li>• Horizontal directional drilling would be utilized to run pipelines under roadways so that continued safe use of roadways could be achieved.</li> </ul>
<b>Noise and Vibration</b>	<ul style="list-style-type: none"> <li>• The number of heavy trucks passing by residential receptors would be regulated during construction.</li> <li>• Construction activities would likely occur during daytime hours and would comply with any local noise regulations related to construction.</li> </ul>

**Table 3-14. Possible BMPs to Minimize Potential Impacts from the FutureGen Project**

Resource Area	Possible BMPs <sup>1</sup>
<b>Utility Systems</b>	<ul style="list-style-type: none"> <li>• Existing utility locations would be mapped and checked before finalizing locations of new utility construction to avoid accidental disturbance of these existing underground utilities.</li> <li>• Inspectors would be employed to help ensure that construction does not interfere with existing lines.</li> <li>• In the event of an accident that damaged or severed an existing line, standard emergency procedures would be followed to notify the affected utility so that service is restored as soon as possible.</li> </ul>
<b>Materials and Waste Management</b>	<ul style="list-style-type: none"> <li>• Pollution prevention, waste minimization, and recycling measures would be used to reduce the amounts of waste generated.</li> <li>• Excess construction materials would be stored for potential later use to reduce amount of construction waste sent to landfills.</li> <li>• Recycling would be incorporated into construction and operations to minimize emissions and waste products.</li> </ul>
<b>Human Health, Safety, and Accidents</b>	<ul style="list-style-type: none"> <li>• A site safety plan that focuses on construction activities and provides for safety meetings would be prepared and implemented to help avoid injury during construction.</li> <li>• An OSHA-compliant Worker Protection Program would be established to effectively implement site safety plans, maintain Material Safety Data Sheets (MSDS), track chemical inventories, provide and track worker training, and assess and enforce site safety policies and procedures (e.g., worker personal protective equipment, spill prevention and control, noise monitoring, and construction safety).</li> <li>• Monitoring, cleanout, and inspection procedures for the CO<sub>2</sub> pipelines need to be developed and followed. These plans should include use of safety valves to isolate sections of the pipeline, bleed valves, and continuous pipeline monitoring with computer models to rapidly interpret changes in fluid densities, pressures, etc.</li> <li>• An emergency response plan with procedures to notify the public would be developed.</li> <li>• An SPCC plan would be prepared to describe spill prevention and control measures for the on-site ammonia storage tank and refilling operations. Daily inspection of the valves on the ammonia tank would be conducted to make sure that no leaks have occurred. All refilling operations would be conducted within a portable secondary containment system by trained workers only.</li> </ul>
<b>Community Services</b>	<p>The following fire protection measures would eliminate fire or explosion hazards at the power plant:</p> <ul style="list-style-type: none"> <li>• Good housekeeping practices would be utilized to control the accumulation of flammable and combustible waste materials and residues.</li> <li>• Chemicals would be properly stored to eliminate fire and incompatibility hazards.</li> <li>• MSDS would be available for consultation to determine the appropriate storage of incompatible chemicals.</li> <li>• All state and local fire codes would be adhered to during project operations.</li> <li>• Engineered safeguards and automatic fire suppression systems would be installed in all high risk areas.</li> </ul>
<b>Socioeconomics</b>	<ul style="list-style-type: none"> <li>• There are no BMPs related to Socioeconomics.</li> </ul>
<b>Environmental Justice</b>	<ul style="list-style-type: none"> <li>• There are no BMPs related to Environmental Justice.</li> </ul>

<sup>1</sup> BMPs apply to all four candidate sites unless otherwise noted.

## 3.5 COMMITMENTS, USES, AND PRODUCTIVITY

### 3.5.1 IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES

This section describes the amounts and types of resources that would be irreversibly and irretrievably committed for the proposed FutureGen Project. A resource commitment is considered *irreversible* when primary or secondary impacts from its use limit future use options. Irreversible commitment applies primarily to nonrenewable resources such as minerals or cultural resources, and to those resources that are renewable only over long time spans, such as soil productivity. A resource commitment is considered *irretrievable* when the use or consumption of the resource is neither renewable nor recoverable for use by future generations. Irretrievable commitment applies to the loss of production, harvest, or natural resources.

A resource commitment is **irreversible** when primary or secondary impacts from its use limit future use options and is **irretrievable** when its use or consumption is neither renewable nor recoverable for use by future generations.

The principal resources that would be committed are the lands required for the construction of the proposed FutureGen Project, the proposed utility and transportation corridors requiring new construction and other utility ROWs, and the target formation for permanent CO<sub>2</sub> sequestration. Considerable amounts of water used to operate the FutureGen Power Plant would also be lost (i.e., evaporated rather than discharged back to surface or groundwater). Other resources that would be committed to the proposed project include construction materials (e.g., steel, concrete) and energy (e.g., coal, natural gas) used for construction and operation.

The amount of land that would be committed during construction of the proposed project would include land used for the power plant construction, rail loop, possible on-site landfill, storage piles, pipeline and power line construction ROWs, CO<sub>2</sub> injection site equipment and wells, and, to a lesser extent, access road construction. Although not all of the acreage at the power plant site would actually be developed, it is possible that the entire site would be off limits to other uses. For the Illinois sites, the use of land for the proposed power plant and injection infrastructure would preclude farming in the developed areas, although it is possible that, after the project is concluded, some of the land could revert back to agricultural use.

Temporary easements would be required during pipeline and power line construction, and permanent easements would be maintained for the pipeline ROWs. Temporary and permanent easement lands would not ordinarily be considered as irretrievable resources.

Injection of CO<sub>2</sub> into the subsurface would require gaining permanent mineral rights to the affected area at a defined depth interval. Because sequestration of the CO<sub>2</sub> is intended to be permanent, the use of this portion of the subsurface would be irreversibly committed to CO<sub>2</sub> storage. Once CO<sub>2</sub> injection is completed, some wells and equipment at the injection site could still be used for long-term monitoring purposes, but when the surface facilities are removed, the land could return to other uses.

The FutureGen Project would use up to 3,000 gallons (11,356 liters) of water per minute or 1.6 billion gallons (5.9 billion liters) of water annually that would be irretrievably committed. This water would be used primarily as process water in the cooling towers, which would convert the water to the vapor phase. Because the project would not discharge any of the water directly back to groundwater or surface water, much of this water may be lost to the local area and downstream users.

Material and energy resources committed for the FutureGen Project would include construction materials (e.g., steel, concrete), electricity, and fuel (e.g., coal, diesel, gasoline). All energy used during construction and operation would be irretrievable. During operation, the FutureGen Project would use up to 1.9 million tons (1.7 MMT) of coal annually. The coal source would vary, based on test plans during the 4-year research and testing phase of the project, and afterward could be based on the site location and market forces. Regardless of the source of the coal, these resources would be irretrievably committed. Based on 2005 U.S. coal production statistics, the FutureGen Project would use only 0.17 percent of the coal produced annually. The power plant would also use natural gas during startup and unplanned restart events. Although the amount of natural gas used would be negligible in relation to local capacity, it would be irretrievably committed.

The construction and operation of the proposed FutureGen Project would require the obligation of human resources that would not be available for other activities during the commitment period, but this requirement would not be irreversible.

Finally, the construction and operation of the FutureGen Project would require the commitment of fiscal resources by the Alliance and DOE. However, DOE believes these commitments would help to solve the environmental constraints of using fossil energy resources and to fulfill a Presidential Initiative and national need.

### **3.5.2 RELATIONSHIP BETWEEN SHORT-TERM USES OF THE ENVIRONMENT AND LONG-TERM PRODUCTIVITY**

The proposed power plant site would occupy up to 200 acres (81 hectares) and the injection site would occupy up to 10 acres (4 hectares) of land. Easements would be required for pipelines and power lines. The power plant would consume resources, including coal; natural gas; water; and small quantities of process chemicals, paints, degreasers, and lubricants. Slag from the gasification process would be used beneficially to the extent possible or would be properly disposed of at an off-site landfill if no beneficial use can be identified. Sulfur byproducts would be recovered and marketed. The long-term benefit of the proposed project would be to test advanced power generation systems using IGCC technology at a sufficiently large scale to allow industries and utilities to assess the project's potential for commercial application. The proposed project would also achieve low air emissions of GHGs by capturing and permanently sequestering CO<sub>2</sub> in a deep saline aquifer. This technology would foster the overall long-term reduction in the rate of CO<sub>2</sub> emissions from coal-fueled power plants.

The ability to successfully research and test advanced coal gasification on a variety of coal types, hydrogen turbines, or fuel cells, as well as carbon capture and sequestration, at an operating facility would provide incentive for energy providers in the U.S. and abroad to pursue these types of technologies for future power plants. The successful demonstration of near-zero-emissions electricity production from coal, an abundant worldwide energy source, could foster similar power plants. These technological advancements would further the goal of reducing anthropogenic emissions of GHG that lead to global warming. If the FutureGen Project is successful, the short-term use of land, materials, water, energy, and labor to construct and operate the project would have long-term positive impacts on reducing GHG emissions both in the U.S. and abroad.

## 8. VOLUME I REFERENCES

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- 40 CFR 1500-1508. “Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act.” Council on Environmental Quality, *Code of Federal Regulations*.
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## 8.2 CHAPTER 2 – PROPOSED ACTION AND ALTERNATIVES

40 CFR 144. “Underground Injection Control Program. Sec. 144.12 Prohibition of Movement of Fluid into Underground Sources of Drinking Water.” *Code of Federal Regulations*.

49 CFR 195.444. “Computational Pipeline Monitoring (CPM) Leak Detection.” Department of Transportation, *Code of Federal Regulations*.

68 *Federal Register* 19521. “National Energy Technology Laboratory; Request for Information.” U.S. Department of Energy. *Federal Register* [Volume 68, Number 76]. April 21, 2003.

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## 10. GLOSSARY

Term	Definition
<b>“A-weighted” Scale</b>	Assigns a weight to sound frequencies that is related to how sensitive the human ear is to each sound frequency. Frequencies that are less sensitive to the human ear are weighted less than those for which the ear is more sensitive. A-weighted measurements indicate the potential damage a noise might cause to hearing.
<b>Ambient Noise</b>	Background noise associated with a given environment. Ambient noise is typically formed as a composite of sounds from many near and far sources, with no particular dominant sound.
<b>Aquifer</b>	Body of rock or sediment that is capable of transmitting groundwater and yielding <i>sufficient</i> quantities of water to wells or springs.
<b>Arterial Highway</b>	Highway generally characterized by its ability to quickly move a relatively large volume of traffic, but often with restricted capacities to serve abutting properties. The arterial system typically provides for high travel. The rural and urban arterial highway systems are connected to provide continuous through movements.
<b>Attenuate</b>	To lessen the amount of force, magnitude, or value of something.
<b>Best Management Practice</b>	Method for preventing or reducing the pollution resulting from an activity. Best Management Practice (BMP) includes non-regulatory methods designed to minimize harm to the environment.
<b>Blowdown</b>	Minimum discharge of recirculating water to discharge materials contained in the water, the further buildup of which would cause concentration in amounts exceeding limits established by best engineering practice.
<b>Blowdown Water</b>	Portion of circulating cooling tower water removed to maintain the amount of dissolved solids and other impurities at an acceptable level. Because blowdown water is an industrial wastewater, it is essential to mitigate the potential environmental impact by reducing the volume and hazardous makeup of blowdown water.
<b>Brackish Water</b>	Water that is saltier than fresh water, but less than seawater. Salt content of brackish water is between 0.5 and 30 parts per thousand.
<b>Carbon Dioxide</b>	Greenhouse gas created by combustion and emitted primarily from human activity such as the burning of fossil fuels to generate electricity and operate vehicles, abbreviated CO <sub>2</sub> .
<b>Class I Railroad</b>	Railroad with operating revenues exceeding \$277.5 million.

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<b>Term</b>	<b>Definition</b>
<b>Class I Truck Route</b>	Limited access divided highway that can handle five-axle tractor semi trailers up to 8.5 feet (2.6 meters) wide, up to 13.5 feet (4 meters) high, of any length, and with a gross weight up to 80,000 pounds (36,000 kilograms).
<b>Class II Railroad</b>	Railroad with operating revenues greater than \$20.5 million but less than \$277.5 million for at least three consecutive years.
<b>Class II Truck Route</b>	Roadway that allows 80,000-pound (36,000-kilogram) vehicles up to 60 feet (17 meters) long with a width of 8.5 feet (2.6 meters).
<b>Class III Railroad</b>	Railroad with less than \$10 million in operating revenue; typically short in length.
<b>Class III Truck Route</b>	Roadway that allows 80,000-pound (36,000-kilogram) vehicles up to 60 feet (17 meters) long with a width of 8 feet (2.5 meters).
<b>Clean Water Act</b>	Primary federal law governing water pollution. The Clean Water Act's (CWA's) goals include eliminating toxic substance releases to water, eliminating additional water pollution, and ensuring that surface waters meet standards necessary for human sports and recreation (see <i>National Pollutant Discharge Elimination System</i> ).
<b>Coal Combustion Products</b>	Incombustible by-products generated in coal-burning industrial facilities. The by-products are generated in various steps of the process. Coal combustion products (CCPs) generated in the boilers or furnaces are ash and slag. Other by-products such as fly ash and synthetic gypsum are collected from the emission control systems.
<b>Collector Route</b>	Low or moderate-capacity route which does not provide a highway or arterial road level of service. A collector route often leads traffic to arterial roads or directly to highways. Occasionally a collector route will fill gaps in a grid system between arterial roads. Traffic volumes and speeds are typically lower than those of arterial highways.
<b>Combined Cycle</b>	Combination of two or more thermodynamic cycles in a chemical process, usually for power generation.
<b>Conceptual Site Model</b>	Summary of a site's conditions that identifies the type and location of all potential contamination sources and how and where people, plants, or animals may be exposed.
<b>Continuous Equivalent Sound Level</b>	Steady-state decibel level which would produce the same A-weighted sound energy over a stated period of time as an equivalent sound over time.

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<b>Term</b>	<b>Definition</b>
<b>Corona Noise</b>	Noise caused by partial discharges on insulators and in air surrounding electrical conductors of overhead power lines. Corona noise level is dependent on weather conditions.
<b>Cultural Resources</b>	Archaeological sites, historical sites (e.g., standing structures), Native-American resources, and paleontological resources.
<b>Day-night Equivalent Sound Level</b>	A-weighted equivalent decibel level for a 24-hour period with an additional 10-dB weighting imposed on the equivalent sound levels occurring during nighttime hours (10 pm to 7 am).
<b>Decibel</b>	Unit used to convey intensity of sound, abbreviated (dB).
<b>Deep Ocean Sequestration</b>	Deliberate injection of captured CO <sub>2</sub> into the ocean at great depths where it could potentially be isolated from the atmosphere for centuries. While the technologies currently exist to directly inject CO <sub>2</sub> into the deep ocean, the knowledge base is inadequate to determine what biological, physical, or chemical impacts might occur from interactions with the marine ecosystem.
<b>Deep Saline Aquifer</b>	Deep underground rock formation composed of permeable materials and containing highly saline fluids.
<b>Density</b>	Ratio of a substance's weight relative to its volume.
<b>Dissolution</b>	Process of dissolving a substance into a liquid.
<b>Effluent</b>	Waste stream flowing into the atmosphere, surface water, groundwater, or soil.
<b>End Moraines</b>	Irregular ridges of glacial sediments that formed at the margin or edge of the ice sheet.
<b>Endangered Species</b>	Plants or animals that are in danger of extinction. A federal list of endangered species can be found in 50 CFR 17.11 (wildlife), 50 CFR 17.12 (plants), and 50 CFR 222.23(a) (marine organisms). Illinois maintains its list of endangered species with the Illinois Endangered Species Protection Board and Texas maintains its list with the Texas Parks and Wildlife Department.
<b>Exergy</b>	Amount of energy available to perform useful work ("exergy" is also known as "availability").
<b>Floodplain</b>	Flat or nearly flat land adjacent to a stream or river that experiences occasional or periodic flooding.
<b>Frequency</b>	The number of cycles of completed occurrences per unit of time of a sound wave, most often measured in Hertz.

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<b>Term</b>	<b>Definition</b>
<b>Fuel Cell</b>	Electrochemical cell in which the energy of a reaction between a fuel, such as liquid hydrogen, and an oxidant, such as liquid oxygen, is converted directly and continuously into electrical energy.
<b>Fujita Scale</b>	Standard metric to qualitatively identify the intensity of a tornado based on the damage caused. There are seven categories that range from F0 (weak) to F6 (violent). Each category represents a qualitative level of damage and an estimated range of sustained wind speed delivered by the tornado.
<b>Gasification</b>	Conversion process to gas or a gas-like phase.
<b>Geologic Sequestration</b>	CO <sub>2</sub> capture and storage in deep underground geologic formations.
<b>Greenhouse Gas</b>	Gas that contributes to the greenhouse effect by absorbing infrared radiation and ultimately warming the atmosphere. Greenhouse gases include water vapor, nitrous oxide (NO <sub>x</sub> ), methane, CO <sub>2</sub> , ozone (O <sub>3</sub> ), halogenated fluorocarbons, hydrofluorocarbons, and perfluorinated carbons.
<b>Ground Moraine</b>	Rolling-to-flat landscape that forms under an ice sheet.
<b>Hazardous Waste</b>	Waste that exhibits at least one of four characteristics (ignitability, corrosivity, reactivity, or toxicity), or that is specifically listed by the U.S. Environmental Protection Agency as a hazardous waste. Hazardous waste is regulated under the Resource Conservation and Recovery Act (RCRA) Subtitle C.
<b>Heat Rate</b>	Amount of heat required (usually in Btu) to produce an amount of electricity (usually in kW-hr).
<b>Historic Property</b>	Prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places.
<b>Indirect Job</b>	Job created or sustained from a project's purchase of goods and services from businesses in a region.
<b>Induced Job</b>	Job created or sustained when wage incomes of those employed in direct and indirect jobs are spent on the purchase of goods and services in a region.
<b>Industrial Process Waste</b>	Any liquid, solid, semisolid, or gaseous waste generated when manufacturing a product or performing a service. Examples include cutting oils; paint sludges; equipment cleanings; metallic dust sweepings; used solvents from parts cleaners; and off-specification, contaminated, or recalled wholesale or retail products. The following wastes are not industrial process wastes: uncontaminated packaging materials, uncontaminated machinery components, general household waste, landscape waste, and construction or demolition debris.

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<b>Term</b>	<b>Definition</b>
<b>Integration</b>	Organization or structure so that constituent units function cooperatively.
<b>Koppen Climate Classification</b>	Most widely used system to classify world climate regions based on annual and monthly averages of temperature and precipitation.
<b>Level of Service</b>	Measure of traffic operation effectiveness on a particular roadway facility type.
<b>Local Roads</b>	Public roads and streets not classified as arterials or collectors are classified as local roads. Local roads and streets are characterized by the many points of direct access to adjacent properties and the relatively minor value in accommodating mobility. Speeds and volumes are usually low and trip distances short.
<b>Low Income Population</b>	A community that has a proportion of low-income population greater than the respective average. Low income populations in an affected area should be identified with the annual statistical poverty thresholds from Bureau of the Census Current Population Reports, Series P-60, Income and Poverty.
<b>Mean Sea Level</b>	Average ocean surface height at a particular location for all stages of the tide over a specified time interval (generally 19 years).
<b>Megawatt</b>	Unit of power equal to one million watts. A power plant with 1 megawatt (MW) of capacity operating continuously for a year could supply electricity to approximately 750 households.
<b>Mineral Sequestration</b>	Process of CO <sub>2</sub> reacting with metal oxide bearing materials to form insoluble stable carbonates. Mineral sequestration's main economic challenge is the extremely slow reaction process of naturally occurring minerals with CO <sub>2</sub> .
<b>Minority</b>	Individual(s) who are members of the following population groups: American Indian or Alaskan Native; Asian or Pacific Islander; Black, not of Hispanic origin; or Hispanic.
<b>Minority Population</b>	Identified where either the affected area's minority population exceeds 50 percent or the affected area's minority population percentage is meaningfully greater than the minority population percentage in the general population or other appropriate unit of geographic analysis.
<b>Miscible</b>	Property of liquids that allows them to be mixed together and form a single homogeneous phase.
<b>Monitoring, Mitigation, and Verification</b>	Capability to measure the amount of CO <sub>2</sub> stored at a sequestration site, monitor the site for leaks, to verify that the CO <sub>2</sub> is stored in a way that is permanent and not harmful to the host ecosystem, and to respond to CO <sub>2</sub> leakage or ecological damage in the unlikely event that it should occur. Monitoring, mitigation, and verification (MM&V) applies to geologic sequestration and terrestrial sequestration.

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<b>Term</b>	<b>Definition</b>
<b>Moraine</b>	Rock debris, fallen, or plucked from a mountain and transported by glaciers or ice sheets (see <i>Ground Moraine</i> ).
<b>National Energy Policy</b>	The National Energy Policy (NEP), developed by the National Energy Policy Development Group in 2001 with members of the President's cabinet, is based on three principles: provide a long-term, comprehensive energy strategy; advance new, environmentally-friendly technologies to increase energy supplies and encourage cleaner, more efficient energy use; and seek to raise the living standards of the American people, recognizing that to do so our country must fully integrate its energy, environmental, and economic policies.
<b>National Environmental Policy Act</b>	Signed into law on January 1, 1970, the National Environmental Policy Act (NEPA) declared a national policy to protect the environment and created the Council on Environmental Quality (CEQ) in the Executive Office of the President. To implement the national policy, NEPA requires that environmental factors be considered when federal agencies make decisions, and that a detailed statement of environmental impacts be prepared for all major federal actions significantly affecting the human environment.
<b>National Oceanic Atmospheric and Administration</b>	Department of Commerce agency focused on the condition of the oceans and atmosphere. NOAA divisions include the National Weather Service, the National Hurricane Center, and the National Marine Fisheries Service.
<b>National Pollutant Discharge Elimination System</b>	Provision of the Clean Water Act that prohibits discharge of pollutants into U.S. waters unless a special permit is issued by EPA, a state, or where delegated, a tribal government on a Native American reservation, abbreviated NPDES.
<b>Peak Particle Velocity</b>	Measure of ground vibration. Peak particle velocity is the maximum velocity caused by a sound wave during a particular event.
<b>Permeability</b>	Rate at which fluids flow through the subsurface and reflects the degree to which pore space is connected.
<b>pH</b>	A measure of the acidity or alkalinity of a solution.
<b>Plume Radius</b>	Radius within which 95 percent of the sequestered gas-phase CO <sub>2</sub> mass occurs.
<b>Potable Water</b>	<i>Water that is safe and satisfactory for drinking and cooking.</i>
<b>Resultant Noise Level</b>	A-weighted sound measured in dBA, also called sound level.
<b>Root-Mean-Square</b>	Statistical measure of the magnitude of a varying quantity. The root-mean-square (RMS or rms) is the square root of the mean of the squares of the values.

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<b>Term</b>	<b>Definition</b>
<b>Saline Formation</b>	Porous rock formation that is overlain by one or more impermeable rock formations and thus has the potential to trap injected CO <sub>2</sub> .
<b>Solubility</b>	Ability or tendency of one substance to dissolve into another at a given temperature and pressure.
<b>Sorbent</b>	Material used to absorb other materials. A surface that takes up or holds a substance, by absorption or adsorption.
<b>Sound Pressure Level</b>	Measure of a sound's strength or intensity, expressed in dB. The sound pressure level generated by a steady source of sound will usually vary with distance and direction from the source.
<b>Special Waste</b>	As regulated by the State of Illinois, special waste includes hazardous waste, potentially infectious medical waste, industrial process waste, and pollution control waste (e.g., baghouse dust, landfill waste, scrubber sludge, and chemical spill cleaning material).
<b>Supercritical CO<sub>2</sub></b>	CO <sub>2</sub> usually behaves as a gas in air or as a solid in dry ice. If the temperature and pressure are both increased (above its supercritical temperature of 88°F [31.1°C] and 73 Atmosphere [1073 psi]), it can adopt properties midway between a gas and a liquid, such that it expands to fill its container like a gas, but has a density like that of a liquid.
<b>Surface Water</b>	All bodies of water on the surface and open to the atmosphere, such as rivers, lakes, reservoirs, ponds, seas, and estuaries.
<b>Syngas</b>	Gas mixture containing varying amounts of carbon monoxide (CO) and hydrogen (H <sub>2</sub> ) generated by the gasification of a carbon-containing fuel.
<b>Terrestrial Sequestration</b>	Process through which CO <sub>2</sub> from the atmosphere is absorbed by trees, plants, and crops through photosynthesis and stored as carbon compounds in biomass (tree trunks, branches, foliage, and roots) and soils. While terrestrial sequestration may be an attractive and useful sequestration option, the long-term accountability and permanence, and the inability to directly store the CO <sub>2</sub> captured from a particular power plant make this option unlikely to be implemented in the electrical power industry.
<b>Threatened Species</b>	Plants or animals likely to become endangered species within the foreseeable future. A federal list of threatened species can be found in 50 CFR 17.11 (wildlife), 50 CFR 17.12 (plants), and 50 CFR 227.4 (marine organisms). Illinois maintains its list of threatened species with the Illinois Endangered Species Protection Board and Texas maintains its list with the Texas Parks and Wildlife Department.

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<b>Term</b>	<b>Definition</b>
<b>Traditional Cultural Property</b>	District, site, building, structure, or object that is valued by a community for the role it plays in sustaining the community's cultural integrity, abbreviated TCP.
<i>Underground Source of Drinking Water</i>	<i>Any aquifer or part of an aquifer that: supplies any public water system, or contains a sufficient quantity of groundwater to supply a public water system or currently supplies drinking water for human consumption or contains fewer than 10,000 milligrams per liter of total dissolved solids; and is not an exempted aquifer.</i>
<b>Unplanned Restart</b>	A series of events where power plant components are re-activated in a sequence to bring the plant to its fully operating state after an upset condition has been remedied.
<b>Upset</b>	An unplanned start when the entire system is held at no load while an issue with a component is corrected.
<b>Upset Condition</b>	An unpredictable failure of process components or subsystems which leads to an overall malfunction or temporary shutdown of the power plant.
<b>Vadose Zone</b>	Area of soil between the ground surface and the area directly above the groundwater surface (i.e., the water table) of unconfined aquifers.
<b>Vibration</b>	Force that oscillates about a specified reference point. Vibration is commonly expressed in terms of frequency such as cycles per second (cps), Hertz (Hz), cycles per minute (cpm), and strokes per minute (spm).
<b>Viscosity</b>	Measure of a material's resistance to flow.
<b>Wetland</b>	Area inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas.
<b>Wind Rose</b>	Circular diagram that illustrates the relative frequency of wind speeds for each compass direction based on a time interval.
<b>Zero Liquid Discharge System</b>	Process separates solids and dissolved constituents from the plant wastewater and allows the treated water to be recycled or reused in the industrial process, resulting in no discharge of wastewater to the environment.

## 11. DISTRIBUTION LIST

### Elected Officials

The Honorable John Cornyn	United States Senate
The Honorable Richard Durbin	United States Senate
The Honorable Kay Bailey Hutchison	United States Senate
The Honorable Barack Obama	United States Senate
The Honorable Joe Barton	United States House of Representatives
The Honorable Michael J. Conaway	United States House of Representatives
The Honorable Chet Edwards	United States House of Representatives
The Honorable Timothy V. Johnson	United States House of Representatives
The Honorable Judy Biggert	United States House of Representatives
The Honorable Kevin Brady	United States House of Representatives
The Honorable Jerry F. Costello	United States House of Representatives
The Honorable Charles A. Gonzalez	United States House of Representatives
The Honorable J. Dennis Hastert	United States House of Representatives
The Honorable Jeb Hensarling	United States House of Representatives
The Honorable Ray LaHood	United States House of Representatives
The Honorable Randy Neugebauer	United States House of Representatives
The Honorable Ciro Rodriguez	United States House of Representatives
The Honorable John Shimkus	United States House of Representatives
The Honorable Lamar Smith	United States House of Representatives
The Honorable Jerry Weller	United States House of Representatives
The Honorable Rod Blagojevich	Governor of Illinois
The Honorable Rick Perry	Governor of Texas

**U.S. House of Representatives and U.S. Senate Committees**

The Honorable Byron Dorgan Chairman	United States Senate Committee on Appropriations - Subcommittee on Energy and Water Development
The Honorable Peter J. Visclosky Chairman	United States House of Representatives Committee on Appropriations - Subcommittee on Energy and Water Development
The Honorable Pete V. Domenici Ranking Minority Member	United States Senate Committee on Appropriations - Subcommittee on Energy and Water Development
The Honorable David L. Hobson Ranking Minority Member	United States House of Representatives Committee on Appropriations - Subcommittee on Energy and Water Development
The Honorable John D. Dingell Chairman	United States House of Representatives Committee on Energy and Commerce
The Honorable Joe Barton Ranking Minority Member	United States House of Representatives Committee on Energy and Commerce
The Honorable Jeff Bingaman Chairman	United States Senate Committee on Energy and Natural Resources
The Honorable Pete V. Domenici Ranking Minority Member	United States Senate Committee on Energy and Natural Resources
The Honorable Barbara Boxer Chairwoman	United States Senate Committee on Environment and Public Works
The Honorable James M. Inhofe Ranking Minority Member	United States Senate Committee on Environment and Public Works
The Honorable Barton Gordon Chairman	United States House of Representatives Committee on Science & Technology
The Honorable Ralph Hall Ranking Minority Member	United States House of Representatives Committee on Science & Technology

**Illinois – Elected Officials and Points of Contact**

The Honorable Dale Righter	Illinois State Senate
The Honorable Chapin Rose	Illinois State House of Representatives
Mayor Larry Ferguson	City of Arcola
Mayor John Inyart	City of Charleston
Mayor Raymond Zuehlke	City of Clifton
Mayor Robert F. Utz	City of Effingham
Mayor Kenneth Smith	City of Marshall
Mayor Charles White	City of Mattoon
Mayor Daniel Kleiss	City of Tuscola
Mr. Chuck Knox Board Chairman	Douglas County
Ms. Jan Eads Board Chairman	Coles County
Mr. Tim Anderson Executive Director	Illinois Commerce Commission
Mr. Tom Jennings Division Manager	Illinois Department of Agriculture
Ms. Donna Ferguson	Illinois Department of Natural Resources
Mr. Gary Flenge Director – Division of Environmental Health	Illinois Department of Public Health, Division of Environmental Health
Mr. Dick Smith Director – Office of Planning and Programming	Illinois Department of Transportation
Mr. Jeffrey Sprague Air Quality Planning Section	Illinois Environmental Protection Agency
Mr. Bill Hoback	Illinois Office of Coal Development
Ms. Angela Griffin President	Coles Together
Mr. Brian Moody	Tuscola Economic Development, Inc.

**Texas – Elected Officials and Points of Contact**

The Honorable Robert Duncan	Texas State Senate
The Honorable Stephen E. Ogden	Texas State Senate
The Honorable Kel Seliger	Texas State Senate
The Honorable Fred Brown State Representative	The Texas State House of Representatives
The Honorable Byron Cook State Representative, District 8	The Texas State House of Representatives
The Honorable Jim Duncan State Representative, District 57	The Texas State House of Representatives
The Honorable Pete Gallego State Representative, District 81	The Texas State House of Representatives
The Honorable Jim McReynolds State Representative	The Texas State House of Representatives
The Honorable G.E. West State Representative, District 74	The Texas State House of Representatives
Mr. Zak Covar Governor's Advisor - Natural Resources	Texas Governor's Office
Ms. Auburn Mitchell Governor's Advisor – Water	Texas Governor's Office
Ms. Denise Stines Francis State Single Point of Contact	Texas Governor's Office of Budget, Planning, and Policy

**Texas – Elected Officials and Points of Contact**

Mayor Gail Sowell	Town of Anderson
Mayor Robert Zap	City of Andrews
Mayor Mackie Bobo	City of Bedia
Mayor Russell Devorsky	City of Bellmead
Mayor Milton Tate	City of Brenham
The Honorable Dorothy Morgan Judge	City of Brenham
Mayor Bernard Rychlik	City of Caldwell
Mayor Ron Silvia	City of College Station
Mayor Roy Hill	City of Fairfield
Mayor Tony Villarreal	City of Ft. Stockton
Mayor Jackie Levingston	City of Groesbeck
The Honorable Alta Stone Mayor Pro-Tempore	City of Groesbeck
Mayor June Heck	City of Iraan
Mayor Judi Kirkpatrick	City of Jewett
Mayor Norman Erskine	City of Marlin
Mr. David Mills City Manager	City of Monahans
Mayor Jimmy Tucker	City of Mount Calm
Mayor Bert Miller	City of Navosta
Mayor Larry Melton	City of Odessa
The Honorable David Willard County Judge	City of Odessa

**Texas – Elected Officials and Points of Contact**

Mayor Gerald Meggs	City of Teague
Mayor Bill Lancaster	City of Valley Mills
Mayor Betty Lou Dodd	City of Wink
Mayor Judy Edwards	City of Wortham
The Honorable John Farmer County Judge	Crane County
The Honorable Byron Ryder County Judge	Leon County
The Honorable Arthur M. Henson County Judge	Madison County
The Honorable Mike Sutherland County Judge	Madison County
The Honorable Jim Lewis County Judge	McLennan County
Mayor Win Morrow	Midland County
The Honorable Joe Shuster County Judge	Pecos County
The Honorable Corky Blocker County Judge	Stanton County
The Honorable Vikki Bradley County Judge	Upton County

### **Texas – Elected Officials and Points of Contact**

Mr. Neil McDonald	Odessa Chamber of Commerce/Economic Development
Mr. Paul Hudson Chairman	Public Utility Commission of Texas
Ms. Kathleen Harnett White Chair	Texas Commission on Environmental Quality
Mr. Todd Staples	Texas Department of Agriculture
David M. Lakey, M.D. Commissioner	Texas Department of State Health Services
Mr. Ric Williamson Chairman	Texas Department of Transportation
Mr. F. Lawrence Oaks Executive Director	Texas Historical Commission
Mr. Robert L. Cook	Texas Parks and Wildlife Department
Mr. Michael Williams Commissioner	Railroad Commission of Texas
Ms. Elizabeth Jones Chair	Railroad Commission of Texas

**Federal Agencies**

Mr. Don Klima  
Director, Office of Federal Agency Programs

Advisory Council on Historic  
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National Environmental Coordinator

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Natural Resources Conservation Service

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Rural Utilities Service

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Mr. Willie R. Taylor  
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Mr. Robert L. Hill President	American Association of Blacks in Energy
Mr. Randy Rawson President	American Boiler Manufacturers Association
Mr. David Goss Executive Director	American Coal Ash Association
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Mr. Jim Ford Washington Representative	American Petroleum Institute
Ms. Joy Ditto Government Relations Representative	American Public Power Association
Mr. Scott Tinker	Bureau of Economic Geology- The University of Texas at Austin
Mr. Richard Loughery Director, Environmental Activities	Edison Electric Institute
Ms. Barbara Bauman Tyran Director - Washington Relations	Electric Power Research Institute
Mr. Fred Krupp President	Environmental Defense
Mr. Jim Marston Regional Director	Environmental Defense
Mr. Scott Anderson	Environmental Defense, Texas Office
Mr. Robert Beck Executive Vice President	National Coal Council
Mr. David Quam	National Governors' Association
Mr. Rae Cronmiller Environmental Counsel	National Rural Electric Cooperative Association
Mr. Jim Lyon Senior Vice President for Conservation	National Wildlife Federation
Mr. Eric Goldstein Public Education	Natural Resources Defense Council
Mr. David Hawkins Director, Climate Change	Natural Resources Defense Council

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Mr. Allen Hershkowitz New York Urban Program	Natural Resources Defense Council
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Mr. Thomas Cassidy Director of Federal Programs	The Nature Conservancy
Ms. Lynn McBride	Nature Conservancy of Texas
Ms. Alison Horton Regional Staff Director, Midwest Office	Sierra Club
Ms. Traci Laird Regional Coordinator, Southern Plains Regional Field Office	Sierra Club
Mr. Brandon Young	Sierra Club
Mr. Barry Worthington Executive Director	United States Energy Association
Mr. John Blair President	Valley Watch, Inc.
Mr. Tom Bancroft Vice President of EERD Society	The Wilderness Society

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Mr. Dan Coleman

Mr. Anthony Pleasant

Mr. Jeff Collings

Mr. Roger and Ms. Janet Roney

G.J. Corley

Mr. David Schilling

Mr. Bruce Daily

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Mr. Daniel Downs

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Ms. Catherine Edmiston

Mr. Jeff Strong

Mr. Curt Grissom

Mr. Geoff Summerville

Mr. Bryan Hewing

Mr. Ronald Swager

Mr. Steve Hilgendorf

Mr. Roland Taylor

Mr. Mike and Ms. Jaci Manzella

Ms. Cindy Titus

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Mr. Kevin Wilson

Mr. Joe Micheletti

Ms. Debbie Wood

Mr. Scott Motycka

Mr. Billy F. Wood

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### *U.S. Department of Energy*

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*J.D., Law*

*M.S., Geology*

*B.S., Geology*

*20+ years of experience in environmental sciences, geology, natural gas reservoir simulation, and geotechnical engineering; Registered Professional Geologist.*

*Thomas A. Sarkus - FutureGen Project Director*

*J.D., Law*

*M.S., Earth Sciences*

*B.S., Geology*

*B.S., Chemistry*

*25 years of experience with clean coal technologies, including air pollution control technologies and advanced power generation technologies.*

*Jeffrey Hoffmann – DOE Project Engineer*

*B.S.E., Chemical Engineering*

*B.S., Biological Sciences*

*Provided technical direction and oversight on surface and subsurface facility design, facility emissions, and project goals.*

*Mark Lusk, REM – Senior Environmental Scientist*

*M.S., Biology*

*B.S., Biology*

*Consultant to DOE*

*Peer reviewer for Draft and Final EIS, and all supporting documentation. Contributor for sections on Wetlands and Floodplains, Biological Resources, and Surface Water.*

*20+ years of environmental experience in the areas of site remediation, environmental monitoring, regulatory compliance, and NEPA document preparation.*

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M.S., Environmental Engineering

B.S., Civil Engineering

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14 years of experience with NEPA documentation and analysis on projects for federal agencies.

Debra A. Walker, REM – Project Manager

B.S., Biology

Project Manager

30 years of experience with NEPA documentation and analysis on projects for federal agencies.

Rachel M. Spangenberg – Senior Scientist

B.S., Biology

Deputy Project Manager, Document Manager, Resource Lead for Public Involvement

19 years experience in the preparation of NEPA documentation and environmental compliance audits.

Dorothy Peterson, P.E. – Senior Environmental Engineer

M.S., Engineering Management

B.S., Engineering

Deputy Project Manager

Lead author for Purpose and Need, Description of the Proposed Action and Alternatives, and Cumulative Impacts; Peer reviewer of sections on Health and Safety, Utilities, Meteorology and Climate, and Land Use.

14 years of environmental experience in the areas of site remediation, pollution prevention, environmental planning, community relations, GIS and authoring NEPA documents.

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B.S., Biological Resources Engineering

Assisted with NEPA documentation; contributed to the preparation of the Scoping Document; assisted in the sections review process.

4 years of experience in environmental compliance auditing and documentation, and CAD and GIS support for DOE NEPA documentation.

Anthony Becker – Environmental Scientist

M.S., Biology

B.S., Biology

Peer reviewer of Wetlands, Biological Resources and Materials and Waste. Assisted in preparing Cumulative Impacts, and Proposed Action and Alternatives.

3 years of experience in NEPA documentation and analysis, and ecological investigations on projects for federal agencies.

Raymond J. Bowman, P.G. – Senior Environmental Scientist

M.B.A., Management

M.S., Geology

B.S., Geological Science

QA/QC Manager.

21 years of experience in geologic and hydrogeologic investigations, and NEPA support for federal agencies.

Austina Casey – Senior Environmental Scientist

M.S., Environmental Science

B.S., Chemistry

Peer reviewer on Air Quality sections and provided senior technical support for air quality section.

15 years of experience in the application of environmental policy, regulatory compliance, and air quality analysis for NEPA documentation.

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Juris Doctor

M.S., Environmental Law

B.S., Chemical Engineering

Lead author for Socioeconomics, Community Services, and Regulatory and Permitting Requirements.

2 years of experience with NEPA documentation and analysis on projects for federal agencies.

A. Brook Crossan, Ph.D., P.E. – Senior Environmental Engineer

Ph.D., Geophysical Fluid Dynamics

M.S., Mechanical Engineering

B.S., Mechanical Engineering

Peer reviewer for Wetlands and Floodplains, Biological Resources, Traffic and Transportation, and Noise and Vibration.

35 years of experience with NEPA documentation and analysis on projects for federal agencies.

Michael Dorman – Senior Engineer

M.S., Environmental Engineering

B.S., Civil Engineering

Peer reviewer for the Surface Water and Groundwater.

28 years of experience in water quality analysis and evaluation, permitting, NEPA document preparation, and environmental compliance for federal agencies.

Richard Ellenson – Technical Editor

B.A., Journalism

Formatted EIS and provided technical editing guidance.

4 years of experience formatting, editing, and writing government publications.

Joseph A. Grieshaber – Peer Reviewer

M.B.A., Finance

M.S., Biology

B.S., Biology

Peer reviewer of Socioeconomic and Community Services.

32 years of experience, including 18 years of environmental management, NEPA documentation, and analysis on projects for federal agencies.

Jamie Martin-McNaughton – Environmental Scientist

B.S., Geology-Biology

Technical support and peer reviewer for Geology, Soils and Aesthetics; management lead for graphics  
3 years of experience in geology and field research for environmental and NEPA-related projects.

Robert A. Naumann – Environmental Scientist

M.S., Environmental Science

B.S., Natural Resources

Lead Author for Environmental Justice and peer reviewer for Groundwater, Surface Water, Biological Resources, and Wetlands.

8 years of experience with NEPA documentation and analysis on projects for federal agencies.

Eva Santorini – Graphic Designer

B.A., Fine Art, Painting

Designed and produced exhibit materials and conference graphics for the Public Scoping meetings, and produced collateral materials, such as report covers.

13 years of experience in publication production, including design, layout and production of books and publications, a wide variety of marketing and promotional materials, and public outreach/educational materials and websites.

Deborah Shinkle - GIS Specialist

B.A., Environmental Studies

Provided GIS support for Proposed Action and Alternatives, Utilities, Transportation and Cumulative Impacts.

4 years of data analysis and GIS experience on federal projects.

Liam Sorensen - GIS Specialist

M.S., GIS

B.S., English

Provided GIS support for Proposed Action and Alternatives, Land Use, Surface Water, Utilities and Socioeconomics.

3 years of experience in GIS related work, and 5 years of experience in technical writing.

Catherine E. Wade – Environmental Scientist

B.S., Environmental Science and Policy

Assisted with research and populated tables for Socioeconomics sections; peer reviewer for various sections; contributed to preparation of Appendix A.

1 year of research experience in marine science and field biology.

Neelam Singh – Environmental Scientist

M.A. International Development and Environmental Studies

Assisted with research for Air Quality section during the public comment period, managed the administrative record documentation, and peer reviewer for various sections.

4 years of experience in greenhouse gases and climate change policy field.

## **The Louis Berger Group**

Ellen Hall, Ph.D. – Resource Lead  
Ph.D., Natural Resource Economics  
M.Ag., Agricultural Economics  
B.A., History

Lead author for Aesthetics; group lead for sections on Land Use, Aesthetics and Light, Noise and Vibration, Traffic and Transportation, and Utility Systems; peer reviewer of Socioeconomics, Community Services, and Environmental Justice.

34 years of experience with NEPA documentation and analysis, with particular focus on electrical generation and transmission facilities.

Leslie Smythe – Resource Lead  
M.S., Aquatic Ecology  
B.S., Biology

Technical Group Lead for Natural and Cultural Resources. Peer reviewer of Biological Resources, Wetlands and Cultural Resources.

35 years of experience with NEPA documentation and analysis, 20 years of which were for federal agencies.

Marc Blute, CHMM – Principal Environmental Scientist  
B.S., Atmospheric Sciences

Provided emission estimates and assisted in the preparation of Air Quality sections.

8 years of experience in air quality permitting, compliance, monitoring and control equipment design.

Tom Chadderdon – Senior Archaeologist  
M.A., Anthropology

B.A., Anthropology and Geography

Lead Author for Cultural Resources.

25 years of experience in Cultural Resources Management, 10 years of experience with Cultural Resource documentation and analysis for federal projects.

Susan Davis – Terrestrial Biologist

B.S., Wildlife Management

Lead author for Biological Resources.

10 years of experience with NEPA documentation and analysis for federal agencies.

Steve Eget, P.E. – Director

M.S., Environmental Engineering

B.S., Civil and Environmental Engineering

Peer reviewer for air quality and climate; provided senior technical support for air quality section.

13 years of experience specializing in air quality and environmental engineering for utilities, independent power producers, and cogeneration plants.

Alynda E. Foreman – Ecologist

M.S., Multi-disciplinary Studies - Environmental Research and Education

B.A., Biology; Minor in Environmental Science

Lead author for Floodplains and Wetlands.

10 years of experience with NEPA documentation and analysis on projects for federal agencies.

Thierry Garcy – Principal Engineer  
B.S., Engineering

Lead author for Noise and Vibration.

More than 15 years experience providing noise impact evaluation and monitoring support for environmental reviews, permit acquisition/compliance projects, construction management programs, and other specialty projects.

Jack Halpern – Senior Consultant  
Ph.D. (ABT), Geotechnical Engineering  
M.S., Geotechnical Engineering  
B.S., Mining Engineering

Lead author of sections on Utility Systems, and Security/Terrorism; Peer reviewer for Materials and Waste Management, Human Health and Safety.

40 years of experience with siting, permitting and constructing fossil- and nuclear-fueled generation facilities and transmission lines.

Mark W. Killgore, P.E., D. WRE – Principal Engineer

B.S. Civil Engineering

M.S. Civil Engineering

Provided senior technical support for Utilities section.

28 years of experience, including 25 years on energy projects and need for power analyses.

Gary Michalski – Peer Reviewer

M.A., Business Administration

B.S., Industrial Management

Peer reviewer for Utility Systems and Risk Assessment.

More than 35 years experience in industrial development, particularly natural gas, including the supply, transportation, storage, and market sectors. His experience in project development includes regulatory permitting and environmental feasibility analysis.

Michael Mujadin – Consultant

B.S.E., Chemical Engineering

Consultant on technical and operations matters concerning the IGCC design, construction and operating plans, emissions, and air and water quality.

40 years of experience in all phases of gas and oil production, processing, transmission and storage and coal gasification development, construction and operation.

Neeharika Naik-Dhungel – Environmental Manager

M.S., Energy Management and Policy

M.Sc., Theoretical Nuclear Physics

B.Sc., Physics, Chemistry and Mathematics, minor

Author for air quality.

11 years of experience in power plant siting, auditing, and developing air quality compliance programs.

Joseph Ofungwu, Ph.D., P.E. – Principal Engineer

Ph.D., Civil and Environmental Engineering

M.S., Hydraulics and Water Resources Engineering

B.S., Civil Engineering

Prepared air dispersion modeling for air quality analysis.

8 years of experience in air dispersion modeling and human health risk assessments.

Jean Potvin – Senior Planner  
B.S., Recreation and Park Management  
Lead author for Land Use for proposed Illinois sites.  
18 years of federal government experience in regulatory compliance and NEPA documentation and analysis, with particular focus on hydroelectric projects.

James Purdy, AICP – Principal Transportation Planner  
M.C.P., City Planning  
B.S., Physics  
Assisted in preparing Traffic and Transportation.  
32 years experience preparing NEPA and other environmental impact studies for transportation projects and planning studies for states and municipalities, with emphasis on transportation.

Keri Pyke, P.E., PTOE – Principal Traffic Engineer  
B.S., Civil Engineering  
Lead author for Traffic and Transportation.  
13 years of experience in preparing transportation impact studies for federal and state agencies and municipalities.

Dan Ramage – Manager of Multimedia Services  
A.A., Art  
Provided GIS oversight.  
20 years of experience as a highway designer and 16 years of experience as IT manager and multimedia visualization manager.

Peter Sparhawk, AICP – Principal Planner  
B.A., History  
Lead author for Land Use for proposed Texas sites.  
17 years of experience with NEPA and state environmental documentation and analysis, project management, land use and environmental planning, power plant siting and licensing, and environmental permitting.

Michael Whims – Peer Reviewer  
B.S., Geological Engineering  
Peer reviewer for Draft Work Plans for Risk Assessment and Draft Final Risk Assessment Report.  
32 years of experience in the design, construction, and operation of underground natural gas storage facilities.

Randy Winslow – Graphics Technician  
B.F.A. – in process  
Provided photography and GIS maps.  
12 years of experience in graphic design, including 5 years in providing graphics for environmental reports.

Kevin Young – Corporate Lead  
M.S., Zoology  
B.S., Biology  
Louis Berger corporate lead and peer reviewer.

## **Tetra Tech**

Sergio Rivera – Deputy Project Manager  
B.S. Geology  
M.A. Project Management  
Deputy Project Manager/secondary author for Groundwater and Soils.  
16 years of experience in diverse geological and environmental projects.

Lawson Bailey – Senior Health Physicist/Program Manager  
B.S., Biology  
Co-author for Human Health and Safety.  
27 years of professional experience in operations, construction, engineering, management, scientific, and consulting disciplines.

Misty Bernot – Environmental Scientist  
B.A., Environmental Studies  
Lead author for soils.  
1 year of experience with NEPA projects.

Jackie Boltz – Public Outreach Lead  
M.B.A, General Business  
B.A, French Language and Literature  
Served as Public Outreach Lead.  
14 years of experience in planning and implementing public outreach activities for NEPA compliance for multiple federal agencies.

Karen Browne – Environmental Scientist  
B.S., Environmental Science  
M.S., Environmental Policy and Management  
Lead author for Surface Water.  
6 years of experience in NEPA and water resources assessments.

Delight Buenaflor – GIS Specialist  
M.S., Environmental Science and Policy  
B.A., Biology  
Served as GIS specialist for Groundwater, Surface Water, Geology, Physiography and Soils, Human Health, and Risk Assessment.  
10 years of experience in environmental impact analysis, permitting, NEPA document preparation, and environmental compliance for federal agencies.

Rhonda Carlisle – Contract Specialist  
B.A. Business Management  
Cost tracking and budgeting.  
16 years of experience in contracting and budgeting

Chih-fang Chung – GIS Analyst  
M.S. Geography  
B.S. Geography  
Compiled GIS data, performed analyses, and prepared maps.  
8 years of GIS experience.

Amber Genteman – Graphic Artist  
B.A. Technical and Professional Writing  
Technical editor, formatting and graphic illustration  
3 years of experience in technical writing, formatting and graphic illustration.

Steven Gherini – Vice President  
M.S. Civil Engineering  
M.S. Environmental Chemistry  
B.S. Civil Engineering  
Obtained information on the design of the FutureGen plant, pipeline, and injection system from meetings with Future project managers, conference calls, and literature.  
30 years of experience with NEPA documentation and analysis on projects for federal agencies.

Thomas Grieb – Chief Scientist, Vice President  
Ph.D. Environmental Health Science  
M.S. Biostatistics  
M.A. Marine Biology  
A.B. Zoology  
Resource Lead for the Risk Assessment and Peer Reviewer for Soils, Groundwater, Surface Water, Geology and Health, Safety and Accidents.

Mary Hoganson – Environmental Scientist  
M.S., Biology  
B.S., Biology  
Co-Author for Materials and Waste Management.  
17 years of federal government and commercial experience in waste management and regulatory compliance, and NEPA documentation and analysis.

Maher Itani – QA Reviewer  
M.E.A., Engineering Administration  
B.S., Civil Engineering  
Served as QA Reviewer for Groundwater, Surface Water, Geology, Physiography and Soils, Human Health, and Risk Assessment.  
19 years of experience in project management, NEPA document preparation, and environmental compliance for federal agencies.

Robert Johns – Principal Scientist  
Ph.D. Environmental Engineering  
M.S. Petroleum Engineering  
B.S. Mechanical Engineering  
Developed analog site database and conducted post-injection sequestered gas leakage analyses.  
20 years of experience with NEPA documentation and analysis on projects for federal agencies.

Kay Johnson – Principal Scientist  
Ph.D. Environmental Health Science  
M.S. Biology  
A.B. Zoology  
Conducted an assessment of the toxic effects and health risks of the gases potentially released during the pre- and post-injection phases of the project.  
28 years of experience with NEPA documentation and analysis on projects for federal agencies.

Lisa Matis – Environmental Engineer

M.S., Mechanical Engineering

B.S., Chemical Engineering

Lead author of Materials and Waste Management; peer reviewer of Utilities, Regulatory Compliance, and Appendix D.

17 years of federal government and commercial experience in waste management and regulatory compliance, and NEPA documentation and analysis.

Erin McMahan – Environmental Scientist

B.A., Environmental Studies

M.S., Environmental Science and Policy

Secondary author for Surface Water

3 years of experience in NEPA related projects.

Bill Mills – Director

M.S. Environmental Engineering

B.S. Environmental Engineering

B.S. Aerospace Engineering

Developed a conceptual model for post-sequestration risk assessment analysis.

30 years of experience with NEPA documentation and analysis on projects for federal agencies.

Wilma Perry – Administrative Assistant

25 years of clerical experience.

John Radde – Scientist

M.S. Watershed Science

B.S. Fisheries Biology

Obtained detailed meteorological data for the proposed sites and prepared input needed by the various air models used for the project.

16 years of experience with NEPA documentation and analysis on projects for federal agencies.

Mark Rigby – Scientist

Ph.D. Natural Science

M.S. Environmental Science and Ecology

B.A. Aquatic Biology

Co-authored the post-injection risk assessment, calculated risks, developed toxicity criteria and developed the risk assessment report outline.

8 years of experience with NEPA documentation and analysis on projects for federal agencies.

Kateryna Sayenko – IT Programmer

M.S. Computer Science

Performed slab model runs with pre- and post-processing of data.

6 years of IT experience.

Roy Sujoy – Environmental Engineer

Ph.D. Civil and Environmental Engineering

M.S. Civil and Environmental Engineering

B.S. Tech Civil Engineering

Assisted with the preliminary and final risk assessment work plan.

Karen Summers – Director

M.S. Geology

B.A. Geology

Reviewed information on the plant and pipeline, develop approach for the pre-injection risk assessment, and worked on evaluating the results of the modeling of the pre-injection release.

30 years of experience with NEPA documentation and analysis on projects for federal agencies.

Daniel Theisen – Senior Engineer

B.S., Mechanical Engineering

Lead author for Climate and Meteorology; peer reviewer for Utility Systems, Noise and Vibration, and Air Quality

16 years of professional experience, including NEPA document preparation, safety analysis, and dispersion modeling.

Scott Truesdale – Environmental Scientist

B.A., Environmental Science/Geology

Lead author for Geology and Groundwater.

20 years of experience in NEPA projects and assessing impacts to geologic and water resources.

Michael Unga – Principal Scientist

Ph.D. Forest Science

M.S. Mechanical and Aerospace Engineering

B.S. Aeronautical and Astronautical Engineering

Conducted air model simulations of catastrophic pipeline and well failures.

25 years of modeling experience

David Wertz – Environmental Scientist

B.S., Environmental Science

M.Sc., Geophysics

Secondary author for Geology.

7 years of experience in NEPA and other environmental assessments.

Ken Wilkinson – Principal Engineer and Programmer

B.S. Mechanical Engineering

IT support, ftp, and Sharepoint creation and maintenance.

22 years of engineering and IT experience.

Phil Young, CHP – Health Physicist

M.S., Health Physics

B.S., Radiation Health

Co-author of Human Health, Safety, and Accidents.

17 years of professional experience in environmental radiological programs and nuclear engineering for government and utility clients.

## **Independent Consultants**

Kevin L. Johnson – Vice-President, CO<sub>2</sub> Solutions

B.S., Chemical Engineering

Peer reviewer of Risk Assessments, Geology, and Human Health, and Safety.

Over 25 years of experience with environmental assessments, with particular focus on energy industry facilities and carbon sequestration technologies.

Dwight F. Rychel, Ph.D. – Consultant

Ph.D., Operations Research (Environmental Minor)

M.B.A., Business Administration

B.S., Mechanical Engineering

Peer reviewer for Human Health, Safety and Accidents, and Waste Materials and Waste Management.

30+ years in business and technical aspects of the energy industry, including petroleum reservoir engineering and modeling, natural gas storage design and operation, pipeline operations, power plant construction, and enhanced oil recovery (EOR). Published in several areas including CO<sub>2</sub> EOR.

Registered Professional Engineer, Oklahoma.

## **12.1 CONFLICT OF INTEREST AND DISCLOSURE FORMS**

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**Disclosure Statement**  
**Environmental Impact Statement**  
**FutureGen Project**  
**DE-AT26-06NT42921**

DEAR 952.209-8 ORGANIZATIONAL CONFLICTS OF INTEREST DISCLOSURE requires an offeror to provide a statement of any past (within the past twelve months), present, or currently planned financial, contractual, organizational, or other interests relating to the performance of the statement of work. The offeror is to provide a statement that no actual or potential conflict of interest or unfair competitive advantage exists with respect to the advisory and assistance services to be provided in connection with the instant contract or that any actual or potential conflict of interest or unfair competitive advantage that does or may exist with respect to the contract in question has been communicated as part of the statement.

“Financial interest or other interest in the outcome of the project” includes “any financial benefit such as a promise of future construction or design work in the project, as well as indirect benefits the contractor is aware of (e.g., if the project would aid proposals sponsored by the firm’s other clients)”. See 46 FR 18026-18031.

In accordance with these requirements, the entity signing below hereby certify as follows: (check either (a) or (b) and list items being disclosed if (b) is checked).

Financial Interest:

(a)	<input checked="" type="checkbox"/>	Has no past, present, or currently planned financial interest in the outcome of the project.
(b)	<input type="checkbox"/>	Has the following financial interest in the outcome of the project and hereby agree to mitigate to the extent necessary to preclude a conflict prior to award of this contract:
		1.
		2.
		3.

Contractual Interest:

(a)	<input checked="" type="checkbox"/>	Has no past, present, or currently planned contractual interest in the outcome of the project.
(b)	<input type="checkbox"/>	Has the following contractual interest in the outcome of the project and hereby agree to mitigate to the extent necessary to preclude a conflict prior to award of this contract:
		1.
		2.
		3.

Organizational Interest:

(a)	X	Has no past, present, or currently planned organizational interest in the outcome of the project.
(b)		Has the following organizational interest in the outcome of the project and hereby agree to mitigate to the extent necessary to preclude a conflict prior to award of this contract:
		1.
		2.
		3.

Other Interest:

(a)	X	Has no past, present, or currently planned other interest in the outcome of the project.
(b)		Has the following other interest in the outcome of the project and hereby agree to mitigate to the extent necessary to preclude a conflict prior to award of this contract:
		1.
		2.
		3.

Unfair Competitive Advantage:

To the best of my knowledge and belief, no unfair competitive advantage exists with regard to Potomac-Hudson Engineering, Inc.'s participation on the instant contract.

Certified by:



Signature

05/22/06

Date

Frederick J. Carey, Principal  
Name & Title (Printed)

Potomac-Hudson Engineering, Inc.  
Company

**Disclosure Statement**  
 Environmental Impact Statement  
 FutureGen Project  
 DE-AT26-06NT42921

DEAR 952.209-8 ORGANIZATIONAL CONFLICTS OF INTEREST DISCLOSURE requires an offeror to provide a statement of any past (within the past twelve months), present, or currently planned financial, contractual, organizational, or other interests relating to the performance of the statement of work. The offeror is to provide a statement that no actual or potential conflict of interest or unfair competitive advantage exists with respect to the advisory and assistance services to be provided in connection with the instant contract or that any actual or potential conflict of interest or unfair competitive advantage that does or may exist with respect to the contract in question has been communicated as part of the statement.

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In accordance with these requirements, the entity signing below hereby certify as follows: (check either (a) or (b) and list items being disclosed if (b) is checked).

Financial Interest:

(a)	<input checked="" type="checkbox"/>	Has no past, present, or currently planned financial interest in the outcome of the project.
(b)	<input type="checkbox"/>	Has the following financial interest in the outcome of the project and hereby agree to mitigate to the extent necessary to preclude a conflict prior to award of this contract:
		1.
		2.
		3.

Contractual Interest:

(a)	<input checked="" type="checkbox"/>	Has no past, present, or currently planned contractual interest in the outcome of the project.
(b)	<input type="checkbox"/>	Has the following contractual interest in the outcome of the project and hereby agree to mitigate to the extent necessary to preclude a conflict prior to award of this contract:
		1.
		2.
		3.

Organizational Interest:

(a)	X	Has no past, present, or currently planned organizational interest in the outcome of the project.
(b)		Has the following organizational interest in the outcome of the project and hereby agree to mitigate to the extent necessary to preclude a conflict prior to award of this contract:
		1.
		2.
		3.

Other Interest:

(a)	X	Has no past, present, or currently planned other interest in the outcome of the project.
(b)		Has the following other interest in the outcome of the project and hereby agree to mitigate to the extent necessary to preclude a conflict prior to award of this contract:
		1.
		2.
		3.

Unfair Competitive Advantage:

To the best of my knowledge and belief, no unfair competitive advantage exists with regard to Tetra Tech, Inc.'s participation FutureGen Project.

Certified by:

  
\_\_\_\_\_  
Signature

May 16, 2006

\_\_\_\_\_  
Date

Mark E. Smith, Vice President

\_\_\_\_\_  
Name & Title (Printed)

Tetra Tech, Inc.

\_\_\_\_\_  
Company

**Disclosure Statement**  
 Environmental Impact Statement  
 FutureGen Project  
 DE-AT26-06NT42921

DEAR 952.209-8 ORGANIZATIONAL CONFLICTS OF INTEREST DISCLOSURE requires an offeror to provide a statement of any past (within the past twelve months), present, or currently planned financial, contractual, organizational, or other interests relating to the performance of the statement of work. The offeror is to provide a statement that no actual or potential conflict of interest or unfair competitive advantage exists with respect to the advisory and assistance services to be provided in connection with the instant contract or that any actual or potential conflict of interest or unfair competitive advantage that does or may exist with respect to the contract in question has been communicated as part of the statement.

“Financial interest or other interest in the outcome of the project” includes “any financial benefit such as a promise of future construction or design work in the project, as well as indirect benefits the contractor is aware of (e.g., if the project would aid proposals sponsored by the firm’s other clients)”. See 46 FR 18026-18031.

In accordance with these requirements, the entity signing below hereby certify as follows: (check either (a) or (b) and list items being disclosed if (b) is checked).

Financial Interest:

(a)	<input checked="" type="checkbox"/>	Has no past, present, or currently planned financial interest in the outcome of the project.
(b)	<input type="checkbox"/>	Has the following financial interest in the outcome of the project and hereby agree to mitigate to the extent necessary to preclude a conflict prior to award of this contract:
		1.
		2.
		3.

Contractual Interest:

(a)	<input checked="" type="checkbox"/>	Has no past, present, or currently planned contractual interest in the outcome of the project.
(b)	<input type="checkbox"/>	Has the following contractual interest in the outcome of the project and hereby agree to mitigate to the extent necessary to preclude a conflict prior to award of this contract:
		1.
		2.
		3.



**Disclosure Statement**  
**Environmental Impact Statement**  
**FutureGen Project**  
DE-AC26-04NT41817.310.01.001.025

DEAR 952.209-8 ORGANIZATIONAL CONFLICTS OF INTEREST DISCLOSURE requires an offeror to provide a statement of any past (within the past twelve months), present, or currently planned financial, contractual, organizational, or other interests relating to the performance of the statement of work. The offeror is to provide a statement that no actual or potential conflict of interest or unfair competitive advantage exists with respect to the advisory and assistance services to be provided in connection with the instant contract or that any actual or potential conflict of interest or unfair competitive advantage that does or may exist with respect to the contract in question has been communicated as part of the statement.

“Financial interest or other interest in the outcome of the project” includes “any financial benefit such as a promise of future construction or design work in the project, as well as indirect benefits the contractor is aware of (e.g., if the project would aid proposals sponsored by the firm’s other clients)”. See 46 FR 18026-18031.

In accordance with these requirements, the entity signing below hereby certifies as follows: (check either (a) or (b) and list items being disclosed if (b) is checked).

**Financial Interest:**

(a)	<input checked="" type="checkbox"/>	Has no past, present, or currently planned financial interest in the outcome of the project.
(b)	<input type="checkbox"/>	Has the following financial interest in the outcome of the project and hereby agrees to mitigate to the extent necessary to preclude a conflict of interest prior to award of this contract:
		1.
		2.
		3.

**Contractual Interest**

(a)	<input checked="" type="checkbox"/>	Has no past, present, or currently planned contractual interest in the outcome of the project.
(b)	<input type="checkbox"/>	Has the following contractual interest in the outcome of the project and hereby agrees to mitigate to the extent necessary to preclude a conflict of interest prior to award of this contract:
		1.
		2.
		3.



## **APPENDIX A COORDINATION LETTERS**

In the course of preparing this EIS, interaction efforts among state and federal agencies were necessary to discuss issues of concern or other interests that could be affected by the Proposed Action, obtain information pertinent to the environmental impact analysis of the Proposed Action, and initiate consultations or permit processes. Following are the coordination letters sent by various agencies for each of the four candidate sites.

### **A.1 MATTOON**

The following agencies sent coordination letters:

- U.S. Fish and Wildlife Service
- Illinois Department of Natural Resources
- Coles County Highway Department
- Mattoon Township Highway Department
- Bureau of Indian Affairs
- Illinois Historic Preservation Agency

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# United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Marion Illinois Suboffice (ES)  
8588 Route 148  
Marion, IL 62959  
(618) 997-3344

April 14, 2006

Mr. Daniel Wheeler  
Illinois Dept. of Commerce and  
Economic Development  
Office of Coal Development  
620 East Adams Street  
Springfield, Illinois 62701

Dear Mr. Wheeler:

The U.S. Fish and Wildlife Service has been requested to provide threatened and endangered species and critical habitat information associated with possible location of the proposed FutureGen power plant at a site identified as Mattoon – Dole #1 Site, located in Coles County, Illinois. To assist in our review, we have been provided township/section/range location information, an Illinois State Geological Survey map with the site identified, information regarding the land cover occurring on the site and a color infrared aerial photo of the site.

Our records do not indicate the known presence of any federally listed threatened or endangered species on the Mattoon – Dole #1 Site. County records indicate the potential presence of the endangered Indiana bat (*Myotis sodalis*) in Coles County. This species occupies caves and abandoned mines during the winter. During the remainder of the year, Indiana bats utilize trees with rough or exfoliating bark and/or cavities for roosting. Although Indiana bats will forage over open areas, they prefer to forage within the canopy of forests. Land cover on the Mattoon – Dole #1 Site consists of 100% cropland. Therefore, suitable habitat for this species is not present.

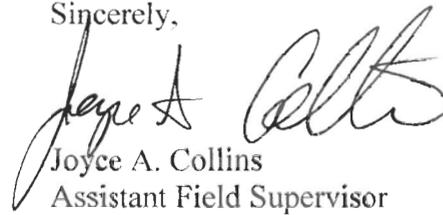
Finally, there is no designated critical habitat for federally listed threatened or endangered species in Coles County.

Mr. Daniel Wheeler

2.

Thank you for the opportunity to **provide information** regarding threatened and **endangered** species. Please **contact** me at 618/997-3344, ext. 340, should you have any questions or require **further** assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Joyce A. Collins". The signature is fluid and cursive, with the first name "Joyce" being more prominent and the last name "Collins" following in a similar style. The signature is positioned above the printed name and title.

Joyce A. Collins  
Assistant Field Supervisor

cc: IDNR (Rettig)



# Illinois Department of Natural Resources

One Natural Resources Way • Springfield, Illinois 62702-1271  
<http://dnr.state.il.us>

Rod R. Blagojevich, Governor

Sam Flood, Acting Director

September 13, 2006

Dan Wheeler  
IL Department of Commerce & Economic Opportunity  
620 East Adams Street  
Springfield, IL 62701

**Re: FutureGen Mattoon – Threatened or Endangered Species, Natural Area,  
And Wetland Review Updates  
Project Number's: 0604520, 0604761, 0604762, 0604763, & 0703118**

Dear Mr. Wheeler :

The Department has conducted a more detailed review, based on additional site specific information, for each of the projects identified above. This letter contains recommendations to avoid or minimize adverse impacts to threatened or endangered species and Natural Areas, as well as the wetland mitigation required under State law for potential impacts to wetlands.

**Project Number 0604520 - Proposed Power Plant & C02 Sequestration Site (Dole Property)**

The Department terminated the Consultation Process on April 11, 2006. There are no documented threatened species, endangered species or Natural Areas in the vicinity of this site.

The original review did not identify any state jurisdictional wetlands on this site. A wetland delineation identified a 0.066 acre State jurisdictional wetland on property adjacent to the northeast corner of this site. The mitigation ratio required for temporary impacts to this wetland is between 1.0:1 and 2.0:1. The mitigation ratio required for permanent impacts is between 1.5:1 and 3.0:1.

**Project Number 0604761 – Primary Cooling Water Corridor**

Upland Sandpiper (Endangered in Illinois), Kirtland's Snake (threatened in Illinois), Eastern Sand Darter (threatened in Illinois), and the Riley Creek Natural Area were identified as in the vicinity of this corridor. Upon further review, the Department has determined that the corridor is not in the vicinity of Upland Sandpiper habitat. The Riley Creek Natural Area supports the Eastern Sand Darter.

Erosion control is especially important to minimize the potential for sedimentation impacts from construction activities adjacent to the stream. The Department recommends that Riley Creek be directionally bored to minimize the potential for adverse impact to Riley Creek and the Eastern Sand Darter. Cassell Creek is a tributary to Riley Creek and may also support the Eastern Sand Darter. Cassell Creek should also be directionally bored. An Incidental Take Authorization for impacts to the Eastern Sand Darter may be required in addition to mitigation for impacts to the Riley Creek Natural Area if these creeks cannot be directionally bored. The Kirtland's Snake is known to occur at the western edge of Charleston. Even though there are no known records within this corridor, the corridor does contain habitat that could be occupied by the Kirtland's Snake. The following recommendations should be incorporated into the construction plans to minimize the potential for adverse impacts to the Kirtland's Snake.

- Construction crews should be educated as to what a Kirtland's snake look's like and allow them to move out of harms way if encountered.
- Trenches should be backfilled immediately after piping has been installed, if possible.
- If trenches must be left open, they should be covered with plywood or similar material at the end of the day. This material should be covered with enough dirt to keep snakes from getting under it.
- Trenches that have not been backfilled must be inspected for the presence of Kirtland's Snakes at the beginning of each day. The Department must be contacted to make arrangements for the a staff biologist to capture and relocate any Kirtland's Snakes trapped in the open trench.

The potential for impacts to the Kirtland's Snake, Eastern Sand Darter, and the Riley Creek Natural Area are considered minor and will not jeopardize the continued existence of the Eastern Sand Darter or Kirtland's Snake in the State, or result in the destruction of the Riley Creek Natural Area.

A wetland delineation identified six State jurisdictional wetlands within this corridor. Impacts to wetlands 1, 2, 3, and 6 can be mitigated at a 1.0:1 ratio if disturbed areas are restored to their original condition after piping has been installed. Temporary impacts to wetlands 4 and 5 may occur if the staging area for directional bores under Riley Creek and Cassell Creek must be located in the wetland. These impacts can be mitigated at a 1.0:1 ratio if disturbed areas are restored to their original condition after piping has been installed.

### **Project Number 0604762 – Secondary Source Cooling Water Corridor**

The intake structure for this corridor will impact the Cooks Mill Segment of the Kaskaskia River Natural Area which supports the Spike Mussel (threatened in Illinois). The construction of the intake should be done during low flow conditions. Erosion control is especially important to minimize these impacts. A mussel survey of the intake footprint must be done prior to construction activities associated with the intake. An Incidental Take Authorization is required to move Spike mussels out of intake footprint to other suitable habitat. Impacts resulting from the construction and operation of the intake as a secondary

cooling water source are considered minor and will not jeopardize the continued existence of the Spike mussel in the State, or result in the destruction of the Cooks Mill segment of the Kaskaskia River Natural Area.

A wetland delineation identified two State jurisdictional wetlands in the area where the intake structure and pump house will be constructed. The larger forested wetland (0.308 acre) will not be impacted. Construction activities will result in permanent impacts to the smaller emergent wetland (0.068 acre). The mitigation ratio required for these impacts will be between 1.5:1 and 3.0:1.

### **Project Number 0604763 – 138kV Electric Gas Corridor**

There are no documented threatened species, endangered species or Natural Areas within these corridors. The wetland delineation did not identify any State jurisdictional wetlands within these corridors.

### **Project 0703118 – 345kV Corridor**

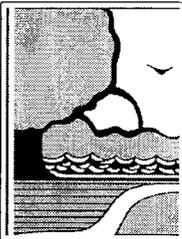
The preliminary review of this corridor identified the Bigeye Chub (endangered in Illinois), Kirtland's Snake (threatened in Illinois), and the Neoga Railroad Prairie Natural Area in the vicinity of this corridor. Upon further review, the Department has determined that the corridor is not in the vicinity of the Neoga Railroad Prairie Natural Area. The record documenting the presence of the Bigeye Chub in the Little Wabash River is very old (7-23-1950) and was collected in the middle of what is now Lake Mattoon. There are no other documented records of the Bigeye Chub within five miles of this corridor. The Kirtland's Snake is known to occur at the vicinity of Lake Paradise to the west of this corridor. Even though there are no known records within this corridor, the corridor does contain habitat that could be occupied by the Kirtland's Snake. The recommendations, made earlier in this letter, to minimize impacts to the Kirtland's Snake are appropriate for this corridor as well.

A wetland delineation identified eleven State jurisdictional wetlands within this corridor. Wetland impacts are avoidable if the existing 138kV corridor is utilized for the 345kV transmission lines. Impacts to these wetlands will not be avoidable if the 345kV corridor is located adjacent to the existing 138kV corridor. The mitigation ratios required for impacts to forested wetlands 12, 13, 14, 15, 19, and 21 along an adjacent corridor will be between 1.5 and 3.0:1. The mitigation ratios required for impacts to forested wetlands 16, 17, and 20 along an adjacent corridor will be between 2.5:1 and 5.5:1. Impacts to wetland 18 are unlikely if utility poles are not sited in this wetland. Wetland 22 will not be impacted.

Please do not hesitate to contact me at (217) 785-5500 if you should have any questions.

Michael Branham  
Division of Ecosystems and Environment  
217-785-5500

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## Illinois Department of Natural Resources

One Natural Resources Way • Springfield, Illinois 62702-1271  
<http://dnr.state.il.us>

Rod R. Blagojevich, Governor

Sam Flood, Acting Director

October 24, 2006

Dan Wheeler  
IL Department of Commerce & Economic Opportunity  
620 East Adams Street  
Springfield, IL 62701

### **Re: Follow-Up Questions on Diverting WWTP Effluents from Kickapoo and Cassell Creeks**

Dear Mr. Wheeler :

The USDOE has requested additional information regarding the potential for impacts to Kickapoo and Cassell Creeks resulting from the diversion of the Mattoon and Charleston WWTP effluents. This effluent water would be the primary source of cooling water for the FutureGen project. The Department has reviewed the response prepared by Patrick Engineering (dated 10-24-06) and concurs with their findings. The diversion of this effluent water will also provide an opportunity to study the potential for beneficial impacts to three listed mussels not previously mentioned.

The Kidneyshell (*Ptychobranchus fasciolaris*) is endangered in Illinois and is only known to occur in Coles county. The Snuffbox (*Epioblasma triquetra*) is endangered in Illinois and is only known to occur in Coles and Douglas counties. The Little Spectaclecase (*Villosa lienosa*) is threatened in Illinois and known to occur in Coles, Douglas, Iroquois, and Vermilion counties. There are valid Coles county records for all three of these mussels in a reach of the Embarras River upstream of its confluence with Kickapoo Creek. The 7Q10 of the Embarras River in the vicinity of these records is between 2.0 cfs and 3.4 cfs. The relationship between the occurrence of specific listed species and the 7Q10 value, if any, is currently undocumented. The diversion of most of the Mattoon effluent should result in a 7Q10 of 3.4 cfs or less in the reach of the Embarras River located downstream of the Kickapoo Creek confluence.

The Embarras River, downstream of the Kickapoo Creek confluence, should be monitored if Mattoon is selected for the FutureGen site to determine if these species ultimately populate this reach of the river. This data could be very valuable when considering if additional study of a relationship between 7Q10 values and specific species occurrence is worth pursuing. Please do not hesitate to contact me at (217) 785-5500 if you should have any questions.

Michael Branham  
Division of Ecosystems and Environment

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## Coles County Highway Department

COLES COUNTY COURTHOUSE  
651 JACKSON STREET, ROOM 16  
CHARLESTON, ILLINOIS 61920

8 September, 2006

Mr. David Wortman  
City of Mattoon  
Director of Public Works  
208 North 19<sup>th</sup> Street  
Mattoon, Illinois 61938

Subject: Status of County Highways

Dear Mr. Wortman:

The Coles County Highway Department currently maintains a Class II truck route along County Highway 18 (County Road 1000N) that begins at County Highway 13 ( County Road 200E) and ends at U.S. Route 45(County Road 600E). The County also has an adjoining Class II truck route along County Highway 18 currently under construction. This section begins at U.S. Route 45(County Road 600E) and ends at (County Road 900E). This section includes a new interchange with Interstate 57. The estimated completion of this construction is June 1, 2008.

The remaining portion of County Highway 18 from County Road 200E to Illinois Route 121 west of the proposed FutureGen site is scheduled to be upgraded to a Class II truck route in fiscal year 2008(beginning July 1, 2007).

Upon completion of the current and proposed construction projects, County Highway 18 will be a non-stop Class II truck route from Interstate Route I-57 to Illinois Route 121.

Sincerely,



Steven L. Newlin  
Coles County Engineer, Acting

cc: file

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Mike Diepholz

Phone: (217) 235-2712

**MATTOON TOWNSHIP HIGHWAY DEPARTMENT**  
**2679 E County Rd 600 N**  
**Mattoon, IL 61938**

September 13, 2006

David Wortman  
Public Works Director  
208 North 19th Street  
Mattoon, IL 61938

Subject: Placement of Potable Water Pipeline on County Road 800N

David,

Mattoon Township has jurisdiction over CR 800N in the area near the FutureGen site. Mattoon Township will allow a potable water pipeline to be placed on the right-of-way of County Road 800 N to serve the FutureGen Plant.

Let me know if there is any other way Mattoon Township can assist in helping FutureGen come to our area.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Diepholz", with a stylized flourish at the end.

Mike Diepholz  
Mattoon Township,  
Road Commissioner

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# United States Department of the Interior

## BUREAU OF INDIAN AFFAIRS

Eastern Oklahoma Regional Office

P.O. Box 8002

Muskogee, OK 74402-8002

IN REPLY REFER TO:

Division of Environmental  
Safety and Cultural Resources

Mr. Mark L. McKoy  
U.S. Department of Energy  
P. O. Box 880  
Morgantown, West Virginia 26507-0880

JAN 22 2007

Dear Mr. McKoy:

On December 11, 2006, the Bureau of Indian Affairs (BIA), Eastern Oklahoma Regional Office (EORO), received an information request from the U.S. Department of Energy (USDOE) regarding significant impacts to archeological, religious or cultural sites from the construction and operation of a coal-fueled electric power and Hydrogen gas (H<sub>2</sub>) production plant located in Illinois or Texas. The EORO has no comments regarding the project.

The projects in Illinois are within the jurisdictional area of the Bureau's Eastern Region and the projects in Texas are within the jurisdiction area of the Bureau's Southern Plains Region. Both Regions have been provided the notice by copy of this letter. As the other two Regions may have environmental and/or cultural resources concerns relating to the project, it is recommended that the USDOE coordinate directly with them on any of their concerns. The contact addresses are:

Franklin Keel, Regional Director  
Eastern Regional Office  
545 Marriott Drive, Suite 700  
Nashville, Tennessee 37214

Dan Deerinwater, Regional Director  
Southern Plains Regional Office  
P.O. Box 368  
Anadarko, Oklahoma 73005-0368

If any additional information is required, please contact Mr. Bob Coleman, Division Chief, Division of Environmental, Safety and Cultural Resources, EORO, at (918) 781-4660.

Respectfully,

Regional Director

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**Illinois Historic  
Preservation Agency**

1 Old State Capitol Plaza • Springfield, Illinois 62701-1512 • Teletypewriter Only (217) 524-7128

Voice (217) 782-4836

Coles County  
Mattoon  
Dole #1  
Section 8, 9, 10, 11, 12, 13, 16, 21, 24 T12N R7E  
Power Plant/FutureGen

PLEASE REFER TO: IHPA LOG #011041106

[www.illinois-history.gov](http://www.illinois-history.gov)

January 30, 2007

Mr. Ronald Swager  
Patrick Engineering, Inc.  
300 West Edwards Street, Suite 200  
Springfield, Illinois 62704-1907

Dear Sir:

Acre(s): 527 Site(s): 0  
Archaeological Contractor: UMA/Finney

Thank you for submitting the results of the archaeological reconnaissance. Our comments are required by Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations, 36 CFR 800: "Protection of Historic Properties".

Our staff has reviewed the archaeological Phase I reconnaissance report performed for the project referenced above. The Phase I survey and assessment of the archaeological resources appear to be adequate. Accordingly, we have determined, based upon this report, that no significant historic, architectural, and archaeological resources are located in the project area.

Please submit a copy of this letter with your application to the state or federal agency from which you obtain any permit, license, grant, or other assistance. Please retain this letter in your files as evidence of compliance with Section 106 of the National Historic Preservation Act of 1966, as amended.

Sincerely,

Anne E. Haaker  
Deputy State Historic  
Preservation Officer

AEH

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## A.2 TUSCOLA

The following agencies sent coordination letters:

- U.S. Fish and Wildlife Service
- Illinois Department of Natural Resources
- City of Arcola
- City of Tuscola
- Duke Energy Generation Services
- Urbana and Champaign Sanitary District
- Tuscola-Douglas County FutureGen Task Force
- Bureau of Indian Affairs
- Illinois Historic Preservation Agency

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# United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Marion Illinois Suboffice (ES)  
8588 Route 148  
Marion, IL 62959  
(618) 997-3344

April 14, 2006

Mr. Daniel Wheeler  
Illinois Dept. of Commerce and  
Economic Development  
Office of Coal Development  
620 East Adams Street  
Springfield, Illinois 62701

Dear Mr. Wheeler:

The U.S. Fish and Wildlife Service has been requested to provide threatened and endangered species and critical habitat information associated with possible location of the proposed FutureGen power plant at a site identified as Tuscola – Pflum #2 Site, located in Douglas County, Illinois. To assist in our review, we have been provided township/section/range location information, an Illinois State Geological Survey map with the site identified, information regarding the land cover occurring on the site and a color infrared aerial photo of the site.

Our records do not indicate the known presence of any federally listed threatened or endangered species on the Tuscola – Pflum #2 Site. County records indicate the potential presence of the endangered Indiana bat (*Myotis sodalis*) in Douglas County. This species occupies caves and abandoned mines during the winter. During the remainder of the year, Indiana bats utilize trees with rough or exfoliating bark and/or cavities for roosting. Although Indiana bats will forage over open areas, they prefer to forage within the canopy of forests. Land cover on the Tuscola – Pflum #2 Site consists of 100% cropland. Therefore, suitable habitat for this species is not present.

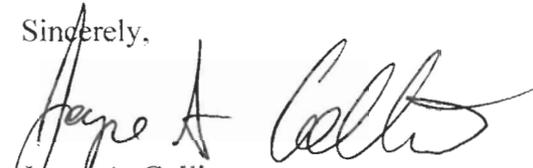
Finally, there is no designated critical habitat for federally listed threatened or endangered species in Douglas County.

Mr. Daniel Wheeler

2.

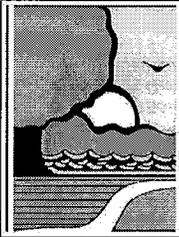
Thank you for the opportunity to provide information regarding threatened and endangered species. Please contact me at 618/997-3344, ext. 340, should you have any questions or require further assistance.

Sincerely,



Joyce A. Collins  
Assistant Field Supervisor

cc: IDNR (Rettig)



# Illinois Department of Natural Resources

One Natural Resources Way • Springfield, Illinois 62702-1271  
<http://dnr.state.il.us>

Rod R. Blagojevich, Governor

Sam Flood, Acting Director

September 14, 2006

Dan Wheeler  
IL Department of Commerce & Economic Opportunity  
620 East Adams Street  
Springfield, IL 62701

**Re: FutureGen Tuscola – Threatened or Endangered Species, Natural Area,  
And Wetland Review Updates  
Project Number's: 0604527, 0604748, 0604749, & 00604750**

Dear Mr. Wheeler:

The Department has conducted a more detailed review, based on additional site specific information, for each of the projects identified above. This letter contains recommendations to avoid or minimize adverse impacts to threatened or endangered species and Natural Areas, as well as the wetland mitigation required under State law for potential impacts to wetlands.

**Project Number 0604527 - Proposed Power Plant Site (Pflum Property)**

The Department terminated the Consultation Process on April 11, 2006. There are no documented threatened species, endangered species or Natural Areas in the vicinity of this site. The wetland delineation did not identify any State jurisdictional wetlands in the vicinity of this site.

**Project Number 0604748 – 345kV Corridor**

The preliminary review concluded that adverse impacts to threatened or endangered species and Natural Areas are unlikely. Upon further review, the Department has determined that portions of the corridor may provide habitat for the Kirtland's Snake (threatened in Illinois). The following recommendations should be incorporated into the construction plans to minimize the potential for adverse impacts to the Kirtland's Snake.

- Construction crews should be educated as to what a Kirtland's snake look's like and allow them to move out of harms way if encountered.
- Trenches should be backfilled immediately after piping has been installed, if possible.

- If trenches must be left open, they should be covered with plywood or similar material at the end of the day. This material should be covered with enough dirt to keep snakes from getting under it.
- Trenches that have not been backfilled must be inspected for the presence of Kirtland's Snakes at the beginning of each day. The Department must be contacted to make arrangements for a staff biologist to capture and relocate any Kirtland's Snakes trapped in the open trench.

The potential for impacts to the Kirtland's Snake are considered minor and will not jeopardize the continued existence of the Kirtland's Snake in the State.

A wetland delineation identified twelve State jurisdictional wetlands within this corridor. Impacts to wetlands 1, 2, 4, 6, 7, 8, 9, 10, 11, and 12 are unlikely if utility poles are not sited in wetland areas. The Department must be consulted regarding the appropriate mitigation if a utility pole must be sited in one or more wetland areas. The mitigation ratio required for the removal of any trees in the vicinity of wetland 3 will be between 1.5:1 and 3.0:1. The mitigation ratio required for impacts to forested wetland 5 will be between 2.5:1 and 5.5:1.

#### **Project Number 0604749 – CO2 corridor and Injection Site**

There are no documented threatened species, endangered species or Natural Areas within the CO2 corridor. There are no documented threatened species, endangered species or Natural Areas in the vicinity of the injection site.

A wetland delineation identified one State jurisdictional wetland (Area 15) within the CO2 corridor. Impacts to this wetland can be mitigated at a 1.0:1 ratio if disturbed areas are restored to their original condition after piping has been installed. Four State jurisdictional wetlands (Area 16, 17, 18, & 19) were identified within the plume area associated with the injection site. These wetlands will not be impacted.

#### **Project Number 0604749 – Cooling Water Corridor**

The preliminary review concluded that adverse impacts to threatened or endangered species and Natural Areas are unlikely. The Equistar chemical plant was identified as the provider of cooling water for the FutureGen site. At the time of the review the Department did not know that the source of Equistar's water was the Kaskaskia River. Equistar maintains the water level of a large on-site reservoir by pumping water from the Kaskaskia River. During times of low flow groundwater pumps located approximately 20 miles upstream are utilized to maintain sufficient water in the Kaskaskia River to meet Equistar's needs. The Kaskaskia River from the Douglas-Champaign county line to the Equistar intake has been identified as a high mussel diversity stream known as the Chicken Bristle Segment of Kaskaskia River Natural Area. The Department conducted a mussel survey August 30, 2006, to document the status of this Natural Area and verify if any listed species of mussels were present. Very few mussels were found and none of them were listed. This segment of the river is unlikely to maintain its status as a Natural Area. Therefore,

Consultation regarding the cooling water source and the corridor to get it to the FutureGen site is terminated.

A wetland delineation identified two State Jurisdictional Wetlands in the vicinity of the Equistar Plant (Area 13) and the water intake (Area 14). Impacts to wetland 13 can be mitigated at a 1.0:1 ratio if disturbed areas are restored to their original condition after piping has been installed. There will be no impacts to wetland 14 associated with FutureGen.

Please do not hesitate to contact me at (217) 785-5500 if you should have any questions.

Michael Branham  
Division of Ecosystems and Environment  
217-785-5500

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# City of Arcola

114 N. Locust Street  
P.O. Box 215

Arcola, Illinois 61910

Phone: (217) 268-4966  
Fax: (217) 268-4968

City Aldermen  
RANDY WILLIAMS  
KARLA LAMPE  
GLENN GENTRY  
KENDALL MOORE  
JEREMY EAST  
JASON GOAD



LARRY FERGUSON - Mayor  
CAROL TURNER - City Clerk  
FRED HARVEY - Treasurer  
EMERSON L. MOORE - City Attorney

April 26, 2006

Patrick Engineering  
300 West Edwards Street,  
Suite 200  
Springfield, IL 62704

RE: FutureGen Project

This letter is in reference to your investigation into the feasibility of Tuscola, IL as a site for the potential FutureGen Project. The City of Arcola in accordance with its zoning ordinance controls zoning 1.5 miles out from the municipal boundary.

"25-2-1. Jurisdiction and compliance. The jurisdiction of this chapter shall include all lands and waters within the corporate limits of the municipality, and the area extending one and one-half miles beyond such corporate limits.

All buildings erected hereafter, all uses of land or buildings established hereafter, all structural alterations or relocation of existing buildings occurring hereafter shall be subject to all regulations of this chapter which are applicable to the zoning districts in which such buildings, uses, or land shall be located."

Any development within the 1.5 miles boundary of the Arcola Municipal limits would only be required to obtain a building permit.

"25-9-2. Permits.

(a) No person shall erect, alter, remodel, move or remove any kind of a structure or building or part thereof without first securing a building permit therefore, provided no such permit shall be required for repairs, construction, reconstruction or alteration of a building where the size, basic configuration and location of the building remain the same.

(b) Permit fees. Fees for building permits shall be as follows:

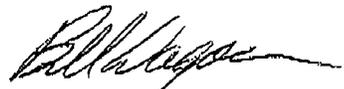
(1) None for structures used for agricultural purposes within RD districts including residences of farm owners, tenants and members of the owners' immediate families.  
(2) Ten cents per square foot for the first 1,000 square feet of floor area and eight cents per square foot for floor area in excess of 1,000 square feet for all buildings, excluding buildings referred to in subparagraph (b) (1) of this section, provided that there shall be a minimum fee of twenty dollars for each permit.

(c) Exhibits. Each application for a building permit and for an occupancy permit for the use of land shall be accompanied by the following exhibits unless waived by the Zoning Officer.

- (1) Boundary survey of an area including the property in question and 100 feet beyond its outer boundaries showing existing utilities, lot boundaries and dimensions, buildings and easements. Foliage, topography, waterways and soil borings to be included if pertinent.
- (2) Plot plan indicating location, size and placement of proposed structure and yards, parking and loading facilities, vehicular access and egress, and utility plant including surface drainage.
- (d) Permit application procedure. Procedure for applying for a building permit and an occupancy permit shall be as follows:
- (1) The property owner or his agent shall meet with the Zoning Officer to explain the situation, learn the procedures, and obtain an application form.
- (2) The applicant shall file the completed application form together with the required exhibits with the Zoning Officer.
- (3) The Zoning Officer shall issue a building permit and collect the required permit fee if the proposed project complies with the provisions of this chapter, and other relevant portions of this Code.
- (e) Revocation of building permits. Where a building permit has been issued pursuant to the provisions of this chapter, such permit shall become null and void without further action by the Zoning Officer or City Council unless work thereon commences within 90 days from the date of granting such permit.
- (f) Valuation. For purposes of valuation on the Zoning Officer's report, all residences and non-residences exclusive of garages and accessory buildings shall be valued at \$75 per square foot of all floor area and all accessory buildings and garages shall be valued at \$25 per square foot of all floor area.
- (g) Penalty. It shall be unlawful for any contractor to erect, alter, remodel, move or remove any kind of a structure or building or part thereof without securing a building permit therefore. Any contractor violating this provision shall be subject to a penalty as follows: not less than \$200 nor more than \$500 for the first offense, not less than \$300 nor more than \$500 for the second offense, not less than \$400 nor more than \$500 for the third offense, and \$500 for the fourth or subsequent offense."

Should you have any further questions, please do not hesitate to contact me.

Sincerely,



Bill Wagoner  
City Administrator

BETH LEAMON  
CITY CLERK

ALTA LONG  
CITY TREASURER



DANIEL J. KLEISS  
MAYOR

J. DREW HOEL  
CITY ADMINISTRATOR

MEMBER OF ILLINOIS MUNICIPAL LEAGUE

## *City of Tuscola*

214 NORTH MAIN STREET  
TUSCOLA, ILLINOIS 61953-1486

TEL. (217) 253-2112

FAX (217) 253-5026

September 13, 2006

Futuregen Industrial Alliance  
International Square  
1875 I Street, N.W.  
5<sup>th</sup> Floor  
Washington, D.C. 20006  
Att'n: Site Selection Team

RE: Tuscola, Illinois FutureGen Site

Dear Selection Team Members,

Please allow this letter to confirm the City of Tuscola staff position relative to zoning for the proposed FutureGen site west of the Tuscola City limits. Zoning is, potentially, a legislative process subject to consideration by the Tuscola City Council and the Tuscola Planning Commission. However, I do not anticipate that either of these entities will choose to pursue hearings or actions relative to the zoning on these parcels.

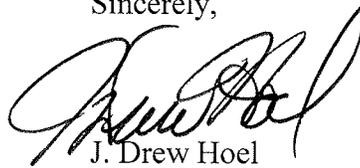
A portion of the proposed site does, in fact, lie within the one and one-half mile extra-territorial zoning jurisdiction of the City of Tuscola. However, the majority of the site does not lie within that jurisdiction. Further, the extra-territorial jurisdiction allowed pursuant to statute is permissive, rather than directive. In other words, the City of Tuscola has discretion to choose whether or not to implement its zoning authority in that jurisdiction.

Since the majority of the proposed site is outside of the jurisdiction, and since the proposed use is entirely consistent with the City's Comprehensive Land Use Plan, I am confident that the City of Tuscola will choose not to implement its zoning authority relative to the proposed FutureGen site.

FutureGen Industrial Alliance  
September 13, 2006  
Page Two

Please feel free to contact me with any questions or comments. My staff and I stand ready to assist you in any that we can.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Drew Hoel". The signature is fluid and cursive, with a large initial "J" and "H".

J. Drew Hoel  
City Administrator

cc: The Honorable Daniel J. Kleiss, Mayor  
Mr. Steve Hettinger, Building Inspector  
Mr. Brian Moody, Executive Director, TEDI



*Generation Services*

Brian A. Moody  
Executive Director  
Tuscola Economic Development, Inc.  
214 N. Main Street  
P.O. Box 145  
Tuscola, IL 61953

Brian,

Here is an overview of how the water plant system works and the impact of "zero" discharge. This information provided is with the understanding that Duke is the owner/operators of the water treatment system and operates the waste treatment for Lyondell.

The Tuscola site obtains its raw water supply from the Kaskakia River. Through the use of a 18 acres 150 million gallon holding pond the site is able to run at the current rates for 30 to 45 days without pumping from the river if needed. During normal river flows the holding pond is pumped into on a regular basis. However during dryer periods the practice has been not to pump out of river to maintain the holding pond level but to wait for moderate to heavy rains to increase the river flow and pump at maximum rate to refill holding pond. During these high river flows the flow will get up to 477 million gallons a day plus. We also pump from the Bondville wells to supplement the river flow during dryer periods of time. One reasons for pumping from the Bondville wells is the discharge permit (NPDES permit) requires a 5:1 dilution ratio to discharge. With "zero" discharge pumping would no longer be need at the same rates if required at all.

Discussions have taken place over the years about going to "zero" discharge. One of the only draw backs could be the possibly of cycle up the metals in the holding pond. At present all metals are a less than the reporting limits but Zinc. Zinc was at .013 mg/l with a reporting limit of .010 mg/l. The cycling issue can be alleviated by putting in metals filtration. The overall cost in conjunction with a sizable project would be small (estimated at \$300,000 or less). The site would be able to do this because of the 33 acres 51 million gallon of treatment ponds would then feed our holding pond at 1.5 million gallons a day on average. The site also has 15 acres 31 million gallons of diversion holding ponds. The primary need for these diversion holding ponds is that all runoff form the existing site go through this waste water treatment plant. This runoff can be as much as 8 million gallon a day coming in and must be held as to not over fill the oxidation ponds. On the Lyondell site they also have a 50 million gallon storm water basin in their north plant area that isn't part of the water system but could be added.

The site has installed water treatment facilities capable of producing 2400 gpm of sodium zeolite softened water and up to 900 gpm of reverse osmosis for boiler make-up water. The average current site demand for softened water is 1000 to 1400 gpm while the average RO system requirements are for 200 gpm to 620 gpm. There is adequate space



## Generation Services

for softeners and RO's to be increased if needed. The remaining water treatment system is capable of treating 9 million gallon a day of make-up to the process water, softeners and RO's.

### 2003 Data

#### River Flow

Max.	345 Million Gallon Day
Min.	4.0 Million Gallon Day
Avg.	19 Million Gallon Day

#### Discharge Rates

Max.	5.81 Million Gallon Day
Min.	0.39 Million Gallon Day
Avg.	1.56 Million Gallon Day

#### Consumption Rates

Max.	3.0 Million Gallon Day
Min.	1.83 Million Gallon Day
Avg.	2.19 Million Gallon Day

### 2004 Data

#### River Flow

Max.	477 Million Gallon Day
Min.	5.0 Million Gallon Day
Avg.	36.59 Million Gallon Day

#### Discharge Rates

Max.	5.62 Million Gallon Day
Min.	0.44 Million Gallon Day
Avg.	1.73 Million Gallon Day

#### Consumption Rates

Max.	3.01 Million Gallon Day
Min.	1.69 Million Gallon Day
Avg.	2.01 Million Gallon Day

### 2005 Data

#### River Flow



*Generation Services*

Max. 487 Million Gallon Day  
Min. 3.0 Million Gallon Day  
Avg. 8.85 Million Gallon Day

Discharge Rates

Max. 8.54 Million Gallon Day  
Min. 0.3 Million Gallon Day  
Avg. 1.34 Million Gallon Day

Consumption Rates

Max. 2.6 Million Gallon Day  
Min. 1.71 Million Gallon Day  
Avg. 1.96 Million Gallon Day

Note: Consumption is taken out before we measure river flow. So if we are pumping at a 3.0 million gallon a day rate from the up stream the river flow will be less that 3.0 million rate. We have no metering on our river pumps.

Larry Behl

A handwritten signature in black ink that reads 'Larry Behl'.

Production Team Group Leader  
Duke Energy Generating Services  
625 E US Highway 36  
Tuscola, Il 61953

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**James Crane PE**

---

**From:** "Mike Little" <MRLittle@U-CSD.Com>  
**To:** "James Crane PE" <James.Crane@douglascountyhighway.org>  
**Sent:** Friday, September 08, 2006 2:29 PM  
**Subject:** RE: plant discharge information

Mr. Crane,

The following is the flow data you requested for the District's Southwest Treatment Plant:

Current Average Daily Discharge = 6 million gallons per day (MGD)

Available Capacity:

Average Daily Flow 7.98 MGD

Peak Average Flow 17.25 MGD

Maximum Daily Flow 27.25 MGD

This facility was expanded in the last year and no future expansions are anticipated before 2019.

Mike Little

Executive Director

Urbana & Champaign Sanitary District

217.367.3409x224

---

**From:** James Crane PE [mailto:James.Crane@douglascountyhighway.org]  
**Sent:** Friday, September 08, 2006 1:36 PM  
**To:** mrlittle@u-csd.com  
**Subject:** plant discharge information  
**Importance:** High

Mr. Little

Please see attached letter. Thank you for your help and information.

James E Crane PE  
Douglas County Engineer

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**TUSCOLA-DOUGLAS COUNTY  
FUTUREGEN TASK FORCE**

C/O Douglas County Highway Department  
200 S. Prairie Street  
Tuscola, IL 61953



December 19, 2006

Mr. Rueben Kaufman  
363 E CR 200N  
Arcola, IL 61910

Re: Tuscola-Douglas County FutureGen Site  
Questionnaire for select Amish Bishops concerning FutureGen Project

Dear Mr. Kaufman,

Tuscola-Douglas County was recently selected as a finalist for FutureGen. FutureGen is a \$1 billion public-private partnership to build the world's first coal-fueled, "near-zero emissions" power production plant. The FutureGen plant will use cutting-edge technologies to generate electricity while capturing and permanently storing carbon dioxide in geological formations. The plant will also produce hydrogen and byproducts for use by other industries.

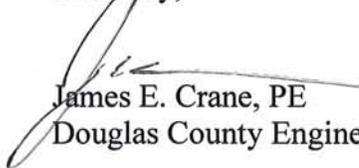
The \$1B FutureGen project will support significant employment across central Illinois. Preliminary employment estimates suggest that approximately 1300 construction jobs and 150 permanent jobs will be created as a result of this project being built. The potential economic impact to Douglas County and to the State of Illinois would be extraordinary if Tuscola-Douglas County is selected as the location for this project.

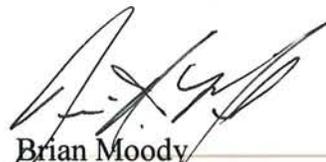
We have been gathering site specific information for the Department of Energy (Federal Government) over the past 3 months. The information gathered has ranged from information on the existing schools in the area to the presence of threatened or endangered species, both plants and animals. The Department of Energy has voiced a concern that this project is being considered within close proximity to the Amish Community and is concerned with what the community's concerns and opinion is concerning this project.

We have attached some information on the project for your review and have attached a questionnaire for you to fill out and send back to us. We would be more than happy to do a presentation on this project that outlines the details of the project and answer any specific questions that anyone may have, if it is wanted within the Amish Community.

Feel free to contact either Jim Crane (217-253-2113) or Brian Moody (217-253-2552) with any questions concerning this request.

Sincerely,

  
James E. Crane, PE  
Douglas County Engineer

  
Brian Moody  
Tuscola Economic Development, Inc.

Cc: file  
Lucy Swartz, Battelle Memorial Institute

Enc.

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**TUSCOLA-DOUGLAS COUNTY  
FUTUREGEN TASK FORCE**

C/O Douglas County Highway Department  
200 S. Prairie Street  
Tuscola, IL 61953



December 19, 2006

Mr. Menno D. Miller  
1822 N CR 280E  
Arcola, IL 61910

Re: Tuscola-Douglas County FutureGen Site  
Questionnaire for select Amish Bishops concerning FutureGen Project

Dear Mr. Miller,

Tuscola-Douglas County was recently selected as a finalist for FutureGen. FutureGen is a \$1 billion public-private partnership to build the world's first coal-fueled, "near-zero emissions" power production plant. The FutureGen plant will use cutting-edge technologies to generate electricity while capturing and permanently storing carbon dioxide in geological formations. The plant will also produce hydrogen and byproducts for use by other industries.

The \$1B FutureGen project will support significant employment across central Illinois. Preliminary employment estimates suggest that approximately 1300 construction jobs and 150 permanent jobs will be created as a result of this project being built. The potential economic impact to Douglas County and to the State of Illinois would be extraordinary if Tuscola-Douglas County is selected as the location for this project.

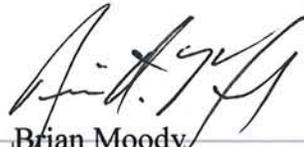
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Feel free to contact either Jim Crane (217-253-2113) or Brian Moody (217-253-2552) with any questions concerning this request.

Sincerely,

  
James E. Crane, PE  
Douglas County Engineer

  
Brian Moody  
Tuscola Economic Development, Inc.

Cc: file  
Lucy Swartz, Battelle Memorial Institute

Enc.

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**TUSCOLA-DOUGLAS COUNTY  
FUTUREGEN TASK FORCE**

C/O Douglas County Highway Department  
200 S. Prairie Street  
Tuscola, IL 61953



December 19, 2006

Mr. Edwin Kaufman  
485 E CR 200N  
Arcola, IL 61910

Re: Tuscola-Douglas County FutureGen Site  
Questionnaire for select Amish Bishops concerning FutureGen Project

Dear Mr. Kaufman,

Tuscola-Douglas County was recently selected as a finalist for FutureGen. FutureGen is a \$1 billion public-private partnership to build the world's first coal-fueled, "near-zero emissions" power production plant. The FutureGen plant will use cutting-edge technologies to generate electricity while capturing and permanently storing carbon dioxide in geological formations. The plant will also produce hydrogen and byproducts for use by other industries.

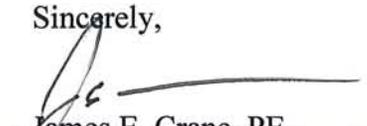
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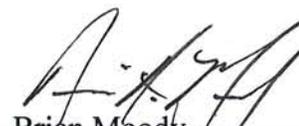
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Douglas County Engineer

  
Brian Moody  
Tuscola Economic Development, Inc.

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Enc.

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**TUSCOLA-DOUGLAS COUNTY  
FUTUREGEN TASK FORCE**

C/O Douglas County Highway Department  
200 S. Prairie Street  
Tuscola, IL 61953



December 19, 2006

Mr. Daniel Otto  
260 N CR 425E  
Arthur, IL 61911

Re: Tuscola-Douglas County FutureGen Site  
Questionnaire for select Amish Bishops concerning FutureGen Project

Dear Mr. Otto,

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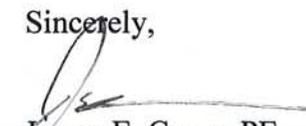
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Douglas County Engineer

  
Brian Moody  
Tuscola Economic Development, Inc.

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Lucy Swartz, Battelle Memorial Institute

Enc.

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**TUSCOLA-DOUGLAS COUNTY  
FUTUREGEN TASK FORCE**

C/O Douglas County Highway Department  
200 S. Prairie Street  
Tuscola, IL 61953



December 19, 2006

Mr. Andy Ray Mast  
348 E CR 300N  
Arthur, IL 61911

Re: Tuscola-Douglas County FutureGen Site  
Questionnaire for select Amish Bishops concerning FutureGen Project

Dear Mr. Mast,

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**TUSCOLA-DOUGLAS COUNTY**

**FUTUREGEN TASK FORCE**

C/O Douglas County Highway Department  
200 S. Prairie Street  
Tuscola, IL 61953



December 19, 2006

Mr. Jake Stutzman  
423 N CR 400E  
Arcola, IL 61910

Re: Tuscola-Douglas County FutureGen Site  
Questionnaire for select Amish Bishops concerning FutureGen Project

Dear Mr. Stutzman,

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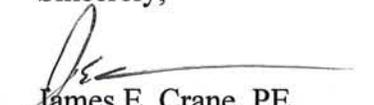
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Douglas County Engineer

  
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**TUSCOLA-DOUGLAS COUNTY  
FUTUREGEN TASK FORCE**

C/O Douglas County Highway Department  
200 S. Prairie Street  
Tuscola, IL 61953



December 19, 2006

Mr. Sam Schrock  
615 N CR 300E  
Tuscola, IL 61953

Re: Tuscola-Douglas County FutureGen Site  
Questionnaire for select Amish Bishops concerning FutureGen Project

Dear Mr. Schrock,

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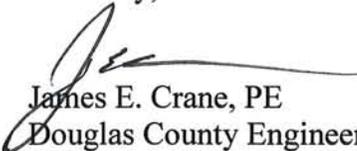
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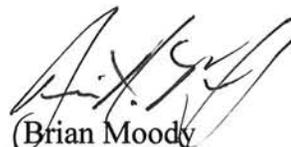
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**TUSCOLA-DOUGLAS COUNTY  
FUTUREGEN TASK FORCE**

C/O Douglas County Highway Department  
200 S. Prairie Street  
Tuscola, IL 61953



December 19, 2006

Mr. Joe A. Mast  
2589 E CR 1450N  
Humbolt, IL 61931

Re: Tuscola-Douglas County FutureGen Site  
Questionnaire for select Amish Bishops concerning FutureGen Project

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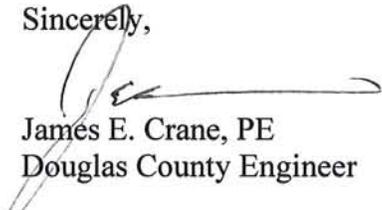
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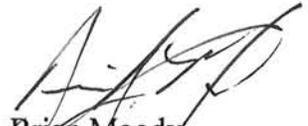
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Lucy Swartz, Battelle Memorial Institute

Enc.

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# United States Department of the Interior

## BUREAU OF INDIAN AFFAIRS

Eastern Oklahoma Regional Office

P.O. Box 8002

Muskogee, OK 74402-8002

IN REPLY REFER TO:

Division of Environmental  
Safety and Cultural Resources

Mr. Mark L. McKoy  
U.S. Department of Energy  
P. O. Box 880  
Morgantown, West Virginia 26507-0880

JAN 22 2007

Dear Mr. McKoy:

On December 11, 2006, the Bureau of Indian Affairs (BIA), Eastern Oklahoma Regional Office (EORO), received an information request from the U.S. Department of Energy (USDOE) regarding significant impacts to archeological, religious or cultural sites from the construction and operation of a coal-fueled electric power and Hydrogen gas (H<sub>2</sub>) production plant located in Illinois or Texas. The EORO has no comments regarding the project.

The projects in Illinois are within the jurisdictional area of the Bureau's Eastern Region and the projects in Texas are within the jurisdiction area of the Bureau's Southern Plains Region. Both Regions have been provided the notice by copy of this letter. As the other two Regions may have environmental and/or cultural resources concerns relating to the project, it is recommended that the USDOE coordinate directly with them on any of their concerns. The contact addresses are:

Franklin Keel, Regional Director  
Eastern Regional Office  
545 Marriott Drive, Suite 700  
Nashville, Tennessee 37214

Dan Deerinwater, Regional Director  
Southern Plains Regional Office  
P.O. Box 368  
Anadarko, Oklahoma 73005-0368

If any additional information is required, please contact Mr. Bob Coleman, Division Chief, Division of Environmental, Safety and Cultural Resources, EORO, at (918) 781-4660.

Respectfully,

Regional Director

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**Illinois Historic  
Preservation Agency**

1 Old State Capitol Plaza • Springfield, Illinois 62701-1512 • Teletypewriter Only (217) 524-7128

Voice (217) 782-4836

Douglas County  
Tuscola  
Pflum #2

PLEASE REFER TO: IHPA LOG #012041106 [www.illinois-history.gov](http://www.illinois-history.gov)

Section 29, 30, 31, 32 T16N R8E, Section 36 T16N R7E  
Section 5, 8, 17, 20, 29, 32 T15N R8E, Section 5, 8 T14N R8E  
Power Plant/FutureGen

January 30, 2007

Mr. Ronald Swager  
Patrick Engineering, Inc.  
300 West Edwards Street, Suite 200  
Springfield, Illinois 62704-1907

Dear Sir:

Acre(s): 532 Site(s): 0  
Archaeological Contractor: UMA/Finney

Thank you for submitting the results of the archaeological reconnaissance. Our comments are required by Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations, 36 CFR 800: "Protection of Historic Properties".

Our staff has reviewed the archaeological Phase I reconnaissance report performed for the project referenced above. The Phase I survey and assessment of the archaeological resources appear to be adequate. Accordingly, we have determined, based upon this report, that no significant historic, architectural, and archaeological resources are located in the project area.

Please submit a copy of this letter with your application to the state or federal agency from which you obtain any permit, license, grant, or other assistance. Please retain this letter in your files as evidence of compliance with Section 106 of the National Historic Preservation Act of 1966, as amended.

Sincerely,

Anne E. Haaker  
Deputy State Historic  
Preservation Officer

AEH

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### **A.3 JEWETT**

The following agencies sent coordination letters:

- U.S. Fish and Wildlife Service
- Texas Parks and Wildlife Department
- Texas Commission on Environmental Quality
- Texas Historical Commission
- Limestone County Office of Road and Bridge Department
- U.S. Department of Energy
- Bureau of Indian Affairs

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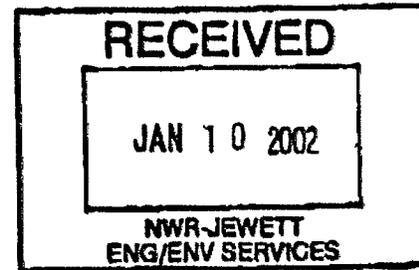


# United States Department of the Interior

## FISH AND WILDLIFE SERVICE

10711 Burnet Road, Suite 200  
Austin, Texas 78758  
(512) 490-0057

January 8, 2002



Nellie Frisbee  
Northwestern Resources Co.  
P.O. Box 915  
Jewett, Texas 75846

Consultation #: 2-15-97-F-396

Dear Ms. Frisbee:

This is a response to your letter dated July 30, 2001 requesting that the U.S. Fish and Wildlife Service (Service) concur with your determination that sites DX2, DX4, DX5, M7, and M25 in the 1998-2003 Permit 32E survey area are not suitable habitat for *Spiranthes parksi*. According to the information provided in the 1999 Re-survey Report (Report) for potential *Spiranthes parksi* sites on the Jewett Mine (Mine), sites DX2, DX4, and DX5 were surveyed in 1995 by Hicks and Company, Inc. and in 1997 by Horizon Environmental Services. Although these surveys indicated that *Spiranthes parksi* occurred on two other sites within the DX area (DX1 and DX3), no individuals of this species were found on DX2, DX4, and DX5. The Report also stated that site M7 was surveyed in 1991, 1992, 1993, and 1995 and site M25 was surveyed in 1991, 1992, and 1998. No *Spiranthes parksi* individuals were observed during any of the surveys conducted in these areas.

Although we cannot concur that no suitable habitat exists in the DX2, DX4, DX5, M7 and M25 areas, based on the results of the surveys conducted, the Service has determined that it is unlikely that individuals of *Spiranthes parksi* occur on these sites. Therefore, compensation for these sites is unnecessary.

In a telephone conversation dated December 13, 2001, you requested our concurrence that no further mitigation for sites M43, M44, and M45 were necessary. According to our files, the Service provided this concurrence on April 24, 2000 in response to a letter sent to our office by Horizon Environmental Services, Inc., which was dated April 18, 2000.

Also during the December 13, 2001 telephone conversation, you expressed concern for our acceptance of the "Interior Least Tern 2003 RCT Permit Term Management Plan (Plan) for the Jewett Surface Mine". We consider the Plan, dated July 2001 to be complete and the Mine to be in compliance with the Service's Biological Opinion, dated April 29, 1999. The Plan will serve as the standard operating procedure for managing interior least terns (*Sterna antillarum athalassos*) within the Permit 32E area of the Mine.

cc: Jaf  
Nellie  
Filo-ouis

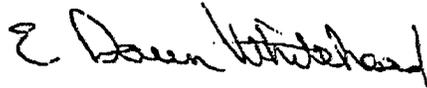
132B-28

Ms. Frisbee

2

We would like to commend the Jewett Mine and Northwestern Resources Co. for their continued concern for endangered species and other natural resources. If you have any questions about these comments, please contact Paige Najvar (512) 490-0057, ext. 229.

Sincerely,



*for* David C. Frederick  
Supervisor

132B-29



# United States Department of the Interior

## FISH AND WILDLIFE SERVICE

10711 Burnet Road, Suite 200  
Austin, Texas 78758  
(512) 490-0057

January 23, 2002

Patsy Turner  
PBS&J  
206 Wild Basin Road, Suite 300  
Austin, Texas 78746

Consultation #: 2-15-97-F-0396

Dear Ms. Turner:

This is a response to your January 11, 2002 letter requesting that the U.S. Fish and Wildlife Service (Service) provide information regarding federally listed or proposed threatened and endangered species and designated Critical Habitat that may occur in the Jewett Mine Permit 32E area in Leon, Limestone, and Freestone Counties, Texas.

### Endangered and Threatened Species

According to our information, the Jewett Mine Permit 32E area is not located within designated Critical Habitat for any federally listed species. The list of federally endangered and threatened species, species proposed for listing, and species of concern that are known to occur in Leon, Limestone, and Freestone Counties is attached to this letter for your review.

Bald Eagle (*Haliaeetus leucocephalus*)--This large, threatened bird of prey, our Nation's symbol, may be found in almost any Texas county during migration. Preferred nesting habitat in Texas is undisturbed coastal regions, or along river systems or lake shores with large, tall (40-120 feet) trees for nesting and roosting. Nests are usually located within 1-2 miles of large bodies of water, such as lakes, reservoirs, or rivers, and are often located in the ecotone or edge between forest and marsh or water. Wintering habitat is characterized by abundant, readily available food sources. Most wintering areas are associated with open water, where eagles feed on fish, waterfowl, and turtles. The closest documented bald eagle sightings to the Jewett Mine Permit 32E area come from nearby Lake Limestone which lies immediately adjacent to the Mine's western permit boundary in Limestone County. Freestone County is within the bald eagles' known wintering range.

Large-Fruited Sand-Verbena (*Abronia macrocarpa*)--This rare plant is a perennial herb that stands up to 20-inches tall. The leaves are usually rounded, and the foliage is sticky from glandular hairs. The magenta flowers are grouped into rounded heads composed of 20-75 individual flowers. As of 1996, approximately 3,000 individuals existed within 3 populations

found in Leon, Freestone, and Robertson County. This plant occurs on nearly level to gently sloping terrain within the post-oak savannah region. It is found in deep sandy, well drained soils with no or very light vegetative cover of grasses and colonizing herbaceous species. This species flowers in March through June and occasionally again in the fall following periods of high rainfall. Field investigations conducted on the Mine site in 1992 identified 25 potential habitat areas based on soils and other characteristics. Surveys conducted on these areas during this species' blooming seasons in 1992 and 1995 yielded negative results.

Houston toad (*Bufo houstonensis*)--This non-glamorous but important endangered species is currently known to occur in just a handful of counties in east-central Texas. It is a terrestrial amphibian associated with deep sandy soils within the Post Oak Savannah vegetational area. Since it is a poor burrower, it requires loose, friable soils for burrowing in order to seek underground protection from cold winter temperatures and hot, dry summer conditions. Habitat conditions in currently occupied areas consist of pine or oak woodlands or savannahs with large areas of deep sandy soils. These toads require still or slow-flowing bodies of water, such as ephemeral pools, flooded fields, blocked drainages of upper creek reaches, wet areas associated with seeps or springs, or more permanent ponds for breeding and egg and tadpole development. This species has been extirpated from much of its former range in the Houston area due to habitat loss and degradation. Surveys for the Houston toad were conducted at almost 70 potentially suitable habitat areas at the Mine from January 30-April 9, 1992. No Houston toads were found in any of the surveys.

Interior Least Tern (*Sterna antillarum*)-- Interior least terns are the smallest North American terns. They breed inland along the Missouri, Mississippi, Colorado, Arkansas, Red, and Rio Grande River systems. Interior least terns prefer bare or sparsely vegetated sand, shell, and gravel beaches, sandbars, islands, or salt flats associated with rivers and reservoirs for nesting habitat. For feeding, these birds need shallow water with an abundance of small fish. They have been known to use sand and gravel pits, ash disposal areas of power plants, reservoir shorelines, and other manmade sites as natural nesting sites have become scarce. The normal operation of the bucketwheel excavator has created an area suitable for nesting and foraging of interior least terns within the Permit 32E area. This species was first noted in the area in July 1994 and have returned every year since, with the exception of 1998. Northwestern Resources has developed the "Interior Least Tern 2003 RCT Permit Term Management Plan for the Jewett Surface Mine", which will serve as the standard operating procedure for managing interior least terns within the Permit 32E area of the Jewett Mine.

Navasota ladies'- tresses (*Spiranthes parksii*)-- This orchid is an erect, slender-stemmed perennial growing 8-15 inches tall. The linear leaves form a rosette but are absent at the time of flowering. White flowers are arranged spirally on the stalk and have conspicuously white-tipped bracts that appear beneath each flower. Flowers are about one-quarter-of-an-inch long with rounded petals. Side petals have a distinct green stripe and extend past the central petals. The lower central petal is ragged. Buds appear in early to late October, and flowering occurs from

mid-October to mid-November. Vegetatively, *Spiranthes* plants are very hard to discern in their habitat, and therefore, surveys are not recommended except during the blooming season. In addition, this species is very similar to two other species that can occur in the same area. Positive identification can only be made during flowering. Blooming is strongly dependent on adequate soil moisture. Navasota ladies'- tresses occur in Brazos, Burleson, Freestone, Fayette, Grimes, Jasper, Leon, Madison, Robertson, and Washington Counties.

Two populations of Navasota ladies'- tresses have been found within the Permit 32E area (sites DX1 and DX3). These occupied sites along with other areas the Service considered potential or supporting habitat sites within the Permit 32E area have been destroyed and compensated by Northwestern Resources with a monetary contribution to the National Fish and Wildlife Foundation to fund habitat conservation in perpetuity for the Navasota ladies'- tresses.

We thank you for your concern for threatened and endangered species and other natural resources. If we can be of further assistance or if you have questions about these comments, please contact Paige Najvar at the Service's Austin Office at (512) 490-0057. Please refer to the Service Consultation listed above in any future correspondence with this office regarding the Jewett Mine Permit 32E area.

Sincerely,



 David C. Frederick  
Supervisor

Enclosures

Federally Listed as Threatened and Endangered Species of  
Leon, Limestone, & Freestone Counties in Texas  
January 18, 2002

DISCLAIMER

This County by County list is based on information available to the U.S. Fish and Wildlife Service at the time of preparation, date on page 1. This list is subject to change, without notice, as new biological information is gathered and should not be used as the sole source for identifying species that may be impacted by a project.

Edwards Aquifer species: (Edwards Aquifer County) refers to those six counties within the Edwards Aquifer region. The Edwards Aquifer underlies portions of Kinney, Uvalde, Medina, Bexar, Hays, and Comal Counties (Texas). The Service has expressed concern that the combined current level of water withdrawal for all consumers from the Edwards Aquifer adversely affects aquifer-dependent species located at Comal and San Marcos springs during low flows. Deterioration of water quality and/or water withdrawal from the Edwards Aquifer may adversely affect eight federally-listed species.

Comal Springs riffle beetle	(E)	<i>Heterelmis comalensis</i>
Comal Springs dryopid beetle	(E)	<i>Stygoparnus comalensis</i>
Fountain darter	(E w/CH)	<i>Etheostoma fonticola</i>
Peck's cave amphipod	(E)	<i>Stygobromus (=Stygonectes) pecki</i>
San Marcos gambusia	(E w/CH)	<i>Gambusia georgei</i>
Texas wild-rice	(E w/CH)	<i>Zizania texana</i>
Texas blind salamander	(E)	<i>Typhlomolge rathbuni</i>
San Marcos salamander	(T □w/CH)	<i>Eurycea nana</i>

\* The Barton Springs salamander is found in Travis County but may be affected by activities within the Barton Springs Segment of the Edwards Aquifer, which includes portions of Northern Hays County.

Migratory Species Common to many or all Counties: Species listed specifically in a county have confirmed sightings. If a species is not listed they may occur as migrants in those counties.

Least tern	(E ~)	<i>Sterna antillarum</i>
Whooping crane	(E w/CH)	<i>Grus americana</i>
Bald eagle	(T)	<i>Haliaeetus leucocephalus</i>
Piping plover	(T w/P/CH)	<i>Charadrius melodus</i>
Loggerhead shrike	(SOC)	<i>Lanius ludovicianus</i>
White-faced ibis	(SOC)	<i>Plegadis chihi</i>

**Leon County**

Least tern	(E ~)	<i>Sterna antillarum</i>
Houston toad	(E w/CH)	<i>Bufo houstonensis</i>
Large-fruited sand-verbena	(E)	<i>Abronia macrocarpa</i>
Navasota ladies'-tresses	(E)	<i>Spiranthes parksii</i>
Bald eagle	(T)	<i>Haliaeetus leucocephalus</i>
Loggerhead shrike	(SOC)	<i>Lanius ludovicianus</i>
Bachman's sparrow	(SOC)	<i>Aimophila aestivalis</i>
Alligator snapping turtle	(SOC)	<i>Macrolemys temmincki</i>
Texas horned lizard	(SOC)	<i>Phrynosoma cornutum</i>

Golden wave tickseed	(SOC)	<i>Coreopsis intermedia</i>
Small-headed pipewort	(SOC)	<i>Eriocaulon kornickianum</i>
Umbrella sedge	(SOC)	<i>Cyperus grayioides</i>

#### Limestone County

Bald eagle	(T)	<i>Haliaeetus leucocephalus</i>
Least tern	(E ~)	<i>Sterna antillarum</i>
Mountain plover	(P/T)	<i>Charadrius montanus</i>
Bachman's sparrow	(SOC)	<i>Aimophila aestivalis</i>
Loggerhead shrike	(SOC)	<i>Lanius ludovicianus</i>
Texas horned lizard	(SOC)	<i>Phrynosoma cornutum</i>
Rough-seeded flameflower	(SOC)	<i>Talinum rugospermum</i>
Small-headed pipewort	(SOC)	<i>Eriocaulon kornickianum</i>

#### Freestone County

Least tern	(E ~)	<i>Sterna antillarum</i>
Large-fruited sand-verbena	(E)	<i>Abronia macrocarpa</i>
Navasota ladies'-tresses	(E)	<i>Spiranthes parksii</i>
Bald eagle	(T)	<i>Haliaeetus leucocephalus</i>
Loggerhead shrike	(SOC)	<i>Lanius ludovicianus</i>
White-faced ibis	(SOC)	<i>Plegadis chihi</i>
Alligator snapping turtle	(SOC)	<i>Macroclermys temmincki</i>
Texas garter snake	(SOC)	<i>Thamnophis sirtalis annectans</i>
Texas horned lizard	(SOC)	<i>Phrynosoma cornutum</i>
Golden wave tickseed	(SOC)	<i>Coreopsis intermedia</i>
Small-headed pipewort	(SOC)	<i>Eriocaulon kornickianum</i>
Umbrella sedge	(SOC)	<i>Cyperus grayioides</i>
Warner's hawthorn	(SOC)	<i>Crataegus warneri</i>

#### INDEX

Statewide or areawide migrants are not included by county, except where they breed or occur in concentrations. The whooping crane is an exception; an attempt is made to include all confirmed sightings on this list.

E	=	Species in danger of extinction throughout all or a significant portion of its range.
T	=	Species which is likely to become endangered within the foreseeable future throughout all or a significant portion of its range.
C	=	Species for which the Service has on file enough substantial information to warrant listing as threatened or endangered.
CH	=	Critical Habitat (in Texas unless annotated †)
P/	=	Proposed ...
P/E	=	Species proposed to be listed as endangered.
P/T	=	Species proposed to be listed as threatened.
TSA	=	Threatened due to similarity of appearance.
SOC	=	Species for which there is some information showing evidence of vulnerability, but not enough data to support listing at this time. These species are afforded no formal protection under the Endangered Species Act of 1973, as amended, but may be protected under other state or federal laws.
□	=	with special rule

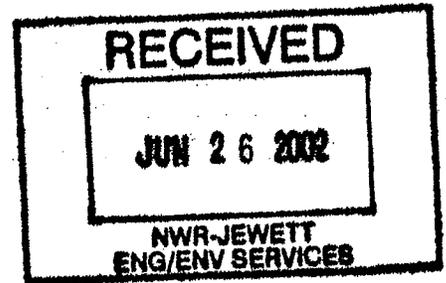
‡  
~

= CH designated (or proposed) outside Texas  
= protection restricted to populations found in the "interior" of the United States. In Texas, the least tern receives full protection, except within 50 miles (80 km) of the Gulf Coast.



# United States Department of the Interior

FISH AND WILDLIFE SERVICE  
10711 Burnet Road, Suite 200  
Austin, Texas 78758  
(512) 490-0057



June 20, 2002

Bonnie Lister  
PBS&J  
206 Wild Basin Road, Suite 300  
Austin, Texas 78746

Consultation #:2-15-02-F-0214

Dear Ms. Lister:

This responds to your April 2, 2002 letter requesting that the U.S. Fish and Wildlife Service (Service) concur with your determination that sites M3/HC21, M5, M30, HC11a, HC12, HC18, HC28, and HC29 within the Jewett Mine Permit 47 survey area are unlikely to contain Navasota ladies'-tresses (*Spiranthes parksii*), and that sites M2/HC20, M16, M36, HC13, and HC23 are not suitable habitat for this plant species. According to the information provided in the 2001 Survey Report for potential *Spiranthes parksii* sites on the Jewett Mine, these thirteen sites were surveyed in three or more years.

Although we cannot concur that no suitable habitat exists in the M2/HC20, M16, M36, HC13, and HC23 areas, based on the results of the surveys conducted on each of the thirteen above mentioned sites, the Service has determined that it is unlikely that individuals of *Spiranthes parksii* occur on these sites. Therefore, we concur that additional surveys on these sites are unnecessary.

Your letter also states that Northwestern Resources Co. (Northwestern) wishes to provide monetary compensation for two sites (M28 and M41) that appear to have been altered either directly or indirectly by mining activities prior to the performance of a sufficient number of Navasota ladies'-tresses surveys. Northwestern would like to compensate for a total of 7.0 acres of potential habitat at sites M28 and M41 at a ratio of 3/4:1 at fair market value. Although an estimated contribution of \$8,855 was suggested in your letter, we calculated that a contribution of \$6,641.25 would be consistent with a compensation ratio of 3/4:1. Payments should be made to the National Fish and Wildlife Foundation for *Spiranthes parksii* habitat conservation initiatives.

We would like to commend the Jewett Mine and Northwestern Resources Co. for their continued concern for endangered species and other natural resources. If you have any questions about these comments, please contact Paige Najvar (512) 490-0057, ext. 229.

Sincerely,

cc: Joel  
Nellie  
Dave Simpson  
[Signature]

[Signature]  
for William Seawell  
Acting Field Supervisor



070170

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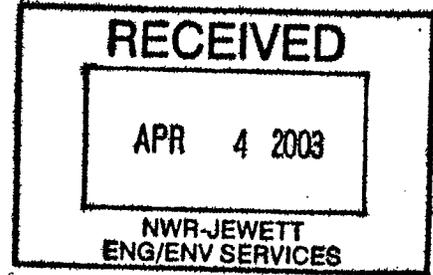


# United States Department of the Interior

## FISH AND WILDLIFE SERVICE

10711 Burnet Road, Suite 200  
Austin, Texas 78758  
(512) 490-0057

March 31, 2003



Kathy Calnan  
PBS&J  
206 Wild Basin Road, Suite 300  
Austin, Texas 78746

Consultation #: 2-15-02-F-0214

Dear Ms. Calnan:

This responds to your March 12, 2003, letter requesting that the U.S. Fish and Wildlife Service (Service) concur with your determination that sites M6/HC24, M9/HC8, M10/HC7, M11/HC6, M13, M15/HC5, M17/HC4, M34, M35, M39, HC3, HC10, and HC11 within the Jewett Mine Permit 32E and 47 survey area are unlikely to contain Navasota ladies'-tresses (*Spiranthes parksii*), and that sites M29, M32, M40, M14, M23, M48, M49, M18, and M37 are not suitable habitat for this plant species. According to the information provided in the 2002 Survey Report for potential *Spiranthes parksii* sites on the Jewett Mine, these twenty-two sites were surveyed in three or more years, with the exception of sites M29, M32, and M40.

Although we cannot concur that no suitable habitat exists in the M29, M32, M40, M14, M23, M48, M49, M18, and M37 areas, based on the results of the surveys conducted on each of the twenty-two above mentioned sites, the Service has determined that it is unlikely that individuals of *Spiranthes parksii* occur on these sites. We agree with Horizon that one year of surveys is sufficient to demonstrate probable absence for sites M29, M32, and M40. Therefore, we concur that additional surveys on these sites are unnecessary.

Your letter also states that Northwestern Resources Co. (Northwestern) wishes to provide monetary compensation for one site (M12) that appears to have been altered either directly or indirectly by mining activities prior to a sufficient number of Navasota ladies'-tresses surveys. Northwestern would like to compensate for a total of 7.6 acres of potential habitat at site M12 at a ratio of 3/4:1 at fair market value. Although an estimated contribution of \$7,211.50 was suggested in your letter, we calculated that a contribution of \$7,210.50 would be consistent with the compensation ratio agreed upon for this site. We agree that total compensation of \$7,210.50 is sufficient to offset potential impacts at site M12.

Northwestern also proposes to compensate for impacts to known existing habitat for Navasota ladies'-tresses at sites M1/HC1 (including M1/HC1/HC20), M4/HC22a, and M4/HC22b. We agree that the total compensation for these three sites of \$34,155.00 is sufficient to offset potential impacts to this species.

030331

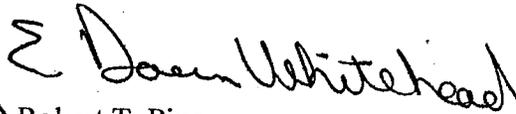
Ms. Calnan

2

We concur that total compensation to be made to the National Fish and Wildlife Foundation for *Spiranthes parksii* habitat conservation initiatives equaling \$41,366.50 is sufficient to offset incidental impacts to Navasota ladies'-tresses due to mine construction activities.

Thank you for you continued concern for endangered species and other natural resources. If you have any questions about these comments, please contact Jana Milliken (512) 490-0057, extension 243.

Sincerely,



for Robert T. Pine  
Supervisor

CC: Joel

Kellie

Dave Simpson

File



## United States Department of the Interior

FISH AND WILDLIFE SERVICE  
10711 Burnet Road, Suite 200  
Austin, Texas 78758  
512 490-0057



JAN 20 2004

Shamon Dorsey  
Horizon Environmental Services, Inc.  
P.O. Box 162017  
Austin, Texas 78716

Consultation #: 2-15-02-F-0214

Dear Mr. Dorsey:

This responds to your December 23, 2003, request that the U.S. Fish and Wildlife Service (Service) concur with your review of potential Navasota ladies'-tresses (*Spiranthes parksii*) habitat sites in advance of mining as agreed in our 1999 and 2002 consultations for the Northwestern Resources Company (Northwestern) Jewett Mine (Mine) in Freestone, Limestone, and Leon counties, Texas.

According to the information provided in the 2003 Horizon Survey Report for potential Navasota ladies'-tresses sites on the Mine, site M38 (within the Permit 32E area) was surveyed for four seasons (1991, 1992, 2002, and 2003); site HC9 (within the Permit 47 area) was surveyed for five seasons (1993, 1994, 1995, 2002, and 2003); and PBS&J 1 and 2 (within the newly acquired 162-acre (66-hectare) study area) were surveyed for two seasons (2002 and 2003). We agree that all survey seasons listed above (except 1993) had the appropriate climatic conditions for determining presence/absence of Navasota ladies'-tresses.

You determined that sites M38, and sites PBS&J 1 and 2 are unlikely to support the endangered Navasota ladies'-tresses. Although we cannot concur that no suitable habitat exists in the M38 and PBS&J 1 and 2 areas, based on the results of the surveys and site-specific conditions, the Service believes it is unlikely that Navasota ladies'-tresses occur on these sites. Therefore, we concur that additional surveys are unnecessary and no further action is necessary for impacts to these sites.

We understand that two small groups of Navasota ladies'-tresses were discovered in the vicinity of the HC9 survey area in 2002 by PBS&J biologists. These two groups are located approximately 300 to 400 feet (91 to 122 meters) south/southwest of the original HC9 survey area, based on approximate geographic coordinates and site descriptions provided by the PBS&J. They are identified as HC9 sites A, B, C, and D, and each site is approximately 0.06 acres (0.02 hectares) in size. It is unclear exactly which site (A, B, C, or D) the two groups were found on, or how many individual plants were identified. No

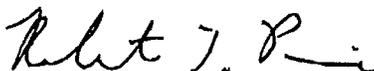
Mr. Dorsey

2

Navasota ladies'-tresses were found at the original HC9 site. Northwestern wishes to provide monetary compensation for sites A, B, C, and D, pursuant to the ratios agreed to in the Service's Biological Opinions for Permit 32E area (April 29, 1999) and Permit 47 Area (May 2, 2002). Northwestern wants to compensate for the 0.25 acres (0.1 hectares) of occupied habitat at a ratio of 2:1 at fair market value. In addition, Northwestern would like to compensate for a total of 0.5 acres (0.2 hectares) of supporting habitat at ratio of 1:1. We agree that a contribution of \$1,265.00 would be consistent with the compensation ratio agreed upon for this site and is sufficient to offset potential impacts at site HC9. No further surveys are necessary for this site. We request receipt of payment to the National Fish and Wildlife Foundation prior to disturbance activities on this site.

Thank you for your continued concern for endangered species and other natural resources. If you have any questions about these comments, please contact Jana Milliken (512) 490-0057, extension 243.

Sincerely,



Robert T. Pine  
Supervisor

cc: Richard Lowe, U.S. Army Corps of Engineers  
Rob Blair, Railroad Commission of Texas  
Nellie Frisbee, Northwestern Resources



# United States Department of the Interior

## FISH AND WILDLIFE SERVICE

10711 Burnet Road, Suite 200

Austin, Texas 78758

512 490-0057

FAX 490-0974



**OCT 20 2006**

Mr. James Wiersema  
Horizon Environmental Services, Inc.  
P.O. Box 162017  
Austin, Texas 78716

Consultation Number 21450-2007-TA-0024

Dear Mr. Wiersema:

This is in response to your letter dated October 6, 2006, requesting review on the proposed site locations for the FutureGen project. Your conversation with my staff on October 16, 2006, clarified the level of review you were requesting. Our review did not result in any additional information other than that obtained from our web site (see below for address). Enclosed is a list of the U.S. Fish and Wildlife Service (Service) threatened and endangered species by county that the FutureGen project may impact if implemented. This list is organized by the counties you have indicated as potential sites for the project. We are providing this information to assist you in assessing and avoiding impacts to federally listed threatened and endangered species, their habitat, and designated wetlands. Further consultation with us may be necessary should this project go forward.

### Federally listed species

The proposed project site is not located within designated critical habitat of any federally listed threatened or endangered species. You may access a list of federally listed or proposed species by county of occurrence in Texas at <http://ifw2es.fws.gov/EndangeredSpecies/lists/>. A searchable database with information related to the life history and ecology of each of these species can be found at <http://endangered.fws.gov/>.

Generally, the Service believes that the first step in determining impacts to endangered species is presence/absence surveys conducted within the project area by persons with appropriate biological expertise. Often, absence of endangered species is determined and the project can then proceed without additional responsibilities under the Endangered Species Act of 1973, as amended (Act). If assessments indicate that suitable habitat is likely to be affected either directly or indirectly, we recommend that you consult with us further. If any endangered species or their habitats are present, the project can often be modified to avoid all impacts. Please send any completed surveys or habitat assessments to our office for assistance in evaluating potential effects.

**TAKE PRIDE<sup>®</sup>  
IN AMERICA** 

If impacts cannot be avoided, we recommend the Department of Energy (DOE) pursue formal consultation through section 7 of the Act. Section 7 requires that all Federal agencies consult with the Service to ensure that the actions authorized, funded, or carried out by such agencies do not jeopardize the continued existence of any threatened or endangered species or adversely modify or destroy critical habitat of such species. It is the primary responsibility of DOE, as the Federal action agency, to determine whether any action it authorizes, funds, or carries out may affect a federally listed or proposed species.

### Candidate Species

We also recommend that you review the potential for your project to affect candidates. Candidate species are those that are being considered for possible addition to the threatened and endangered species list. There is sufficient information on biological vulnerability and threat(s) to support issuance of a proposal to list, but higher priority listings currently preclude issuance of a proposed rule for those species. Candidate species currently have no legal protection. If you find your project may potentially impact these species, the Service would like to provide technical assistance to help avoid or minimize adverse effects. Addressing these species at this stage could better provide for overall ecosystem health in the local area and may avert potential future listing.

### State-listed species

The State of Texas also protects certain species of plants and animals. Contact the Texas Parks and Wildlife Department (Endangered Resources Branch), Fountain Park Plaza Building, Suite 100, 3000 South IH-35, Austin, Texas 78704 (512-912-7011) for information concerning fish, wildlife, and plants of State concern.

### Wetlands and Native Habitats

If your project will involve filling, dredging, or trenching of a wetland or riparian area it may require a Section 404 permit from the U.S. Army Corps of Engineers. For permitting requirements under Section 404 of the Clean Water Act, please contact the Fort Worth District, Permits Section, CESWF-EV-0, P.O. Box 17300, Fort Worth, Texas, 76102-0300, 817-978-2681.

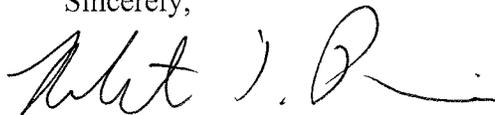
Wetlands and riparian zones provide valuable fish and wildlife habitat as well as contribute to flood control, water quality enhancement, and groundwater recharge. Wetland and riparian vegetation provides food and cover for wildlife, stabilizes banks, and decreases soil erosion. These areas are inherently dynamic and very sensitive to changes caused by such activities as overgrazing, logging, major construction, or earth disturbance. Construction activities near such areas should be carefully designed to minimize impacts. If vegetation clearing is needed in riparian areas, these areas should be revegetated with native wetland and riparian vegetation to prevent erosion or loss of habitat. We recommend minimizing the area of soil scarification and initiating incremental reestablishment of herbaceous vegetation at the proposed work sites. Denuded and/or disturbed areas should be revegetated with a mixture of native legumes and

grasses. Species commonly used for soil stabilization are listed in the Texas Department of Agriculture's (TDA) Native Tree and Plant Directory, available from TDA at P.O. Box 12847, Austin, Texas, 78711.

We also urge you to take all precautions to ensure sediment loading does not occur to receiving streams in the project area. To prevent and/or minimize soil erosion and compaction associated with construction activities, avoid any unnecessary clearing of vegetation, and follow established rights-of-way whenever possible. All machinery and petroleum products should be stored outside the floodplain and/or wetland area during construction to prevent possible contamination of water and soils. No permanent structures should be placed in the 100-year floodplain.

We thank you for your concern for endangered and threatened species and other natural resources, and we appreciate the opportunity to comment on the proposed project. If we can be of further assistance or answer questions about these comments, please contact William Amy at 512-490-0057, extension 234. Please refer to the Service Consultation number listed above in any future correspondence regarding this project.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert T. Pine". The signature is fluid and cursive, with a large initial "R" and a long horizontal stroke at the end.

Robert T. Pine  
Supervisor

Enclosures

Federally Listed as Threatened and Endangered Species of Texas  
September 27, 2006

This list represents species that may be found in counties throughout the Austin Ecological Services office's area of responsibility. Please contact the Austin ES office (U.S. Fish and Wildlife Service, 10711 Burnet Rd., Suite 200, Austin, Texas 78758, 512/490-0057) if additional information is needed.

**DISCLAIMER**

This list is based on information available to the U.S. Fish and Wildlife Service at the time of preparation. This list is subject to change, without notice, as new biological information is gathered and should not be used as the sole source for identifying species that may be impacted by a project.

Migratory Species Common to many or all Counties: Species listed specifically in a county have confirmed sightings. If a species is not listed they may occur as migrants in those counties.

Least tern	(E ~)	<i>Sterna antillarum</i>
Whooping crane	(E w/CH)	<i>Grus americana</i>
Bald eagle	(T)	<i>Haliaeetus leucocephalus</i>
Piping plover	(T w/CH)	<i>Charadrius melodus</i>

**Andrews County**

Sand dune lizard	(C)	<i>Sceloporus arenicolus</i>
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**Freestone County**

Least tern	(E ~)	<i>Sterna antillarum</i>
Large-fruited sand-verbena	(E)	<i>Abronia macrocarpa</i>
Navasota ladies'-tresses	(E)	<i>Spiranthes parksii</i>
Bald eagle	(T)	<i>Haliaeetus leucocephalus</i>

**Leon County**

Least tern	(E ~)	<i>Sterna antillarum</i>
Houston toad	(E w/CH)	<i>Bufo houstonensis</i>
Large-fruited sand-verbena	(E)	<i>Abronia macrocarpa</i>
Navasota ladies'-tresses	(E)	<i>Spiranthes parksii</i>
Bald eagle	(T)	<i>Haliaeetus leucocephalus</i>

**Limestone County**

Bald eagle	(T)	<i>Haliaeetus leucocephalus</i>
Least tern	(E ~)	<i>Sterna antillarum</i>
Navasota ladies'-tresses (E)	<i>Spiranthes parksii</i>	

**Pecos County**

Black-capped vireo	(E)	<i>Vireo atricapilla</i>
Pecos gambusia	(E)	<i>Gambusia nobilis</i>
Leon Springs pupfish	(E w/CH)	<i>Cyprinodon bovinus</i>
Pecos (=puzzle) sunflower	(T)	<i>Helianthus paradoxus</i>
Pecos assiminea snail	(E w/CH)	<i>Assiminea pecos</i>
DiamondY Spring snail	(C)	<i>Tryonia adamantina</i>
Gonzales springsnail	(C)	<i>Tryonia stocktonensis</i>

**Winkler County**  
Sand dune lizard

(C)

*Sceloporus arenicolus*

## INDEX

- E = Species in danger of extinction throughout all or a significant portion of its range.
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- CH = Critical Habitat (in Texas unless annotated ‡)
- P/ = Proposed ...
- P/E = Species proposed to be listed as endangered.
- P/T = Species proposed to be listed as threatened.
- TSA = Threatened due to similarity of appearance. Protections of the Act, such as consultation requirements for Federal agencies under section 7, and recovery planning provisions under section 4(f), do not apply to species listed under similarity of appearance provisions.
- = with special rule
- ‡ = CH designated (or proposed) outside Texas
- ~ = protection restricted to populations found in the “interior” of the United States. In Texas, the least tern receives full protection, except within 50 miles (80 km) of the Gulf Coast.

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January 23, 2002



Ms. Patsy Turner, Sr. Staff Ecologist  
PBS&J  
206 Wild Basin Road, Suite 300  
Austin, Texas 78746

Dear Ms. Turner:

COMMISSIONERS  
LEE M. BASS  
CHAIRMAN, FT. WORTH  
RICHARD (DICK) HEATH  
VICE-CHAIRMAN, DALLAS

ERNEST ANGELO, JR.  
MIDLAND

JOHN AVILA, JR.  
FT. WORTH

CAROL E. DINKINS  
HOUSTON

ALVIN L. HENRY  
HOUSTON

KATHARINE ARMSTRONG IDSAL  
DALLAS

NOLAN RYAN  
ALVIN

MARK E. WATSON, JR.  
SAN ANTONIO

PERRY R. BASS  
CHAIRMAN-EMERITUS  
FT. WORTH

ANDREW SANSON  
EXECUTIVE DIRECTOR

This letter is in response to your request, dated January 11, 2002, for confirmation that the most recent information on rare and threatened and endangered (T&E) species was collected from our maps by Bonnie Lister on January 4, 2002.

The current revision date for the County Lists of Rare Resources for Freestone, Leon, and Limestone counties is still 8/26/99, the same Revised Date appearing on the lists when copied by Bonnie. Without being able to see the maps and notes prepared by Bonnie, I can only use the list of occurrence printouts you noted to me by fax; however, general "Houston Toad habitat" notations on our maps will not have any accompanying printouts. After reviewing the list of rare resources noted from the 7.5' topographic quadrangles of interest (Donie, Farrar, Dew, Jewett, Buffalo, Round Prairie, and Lanely), I found that "Houston Toad habitat" in general should be noted on all the quads. This may have been noted by Bonnie on your maps, but since there is no accompanying printout you may not have included this notation with the list of printouts you supplied me. The Lanely quad had a record of *Coreopsis intermedia*, but this plant is not a listed species and the printout likely not collected, based on your parameters of getting printouts for only listed species. On your fax, you note on the Lanely quad "Bufo houstonensis habitat" but do not separately note the documented occurrence of *Bufo houstonensis* (Houston Toad) appearing on that quad. This may simply be semantics, but a record of occurrence for Houston Toad (printout attached) and general Houston Toad habitat both appear on the Lanely quad.

While data depicted on our maps represents the most recent public information available and processed into the data system, the following disclaimer still applies:

*To manage and conserve the natural and cultural resources of Texas for the use and enjoyment of present and future generations.*

Given the small proportion of public versus private land in Texas, the TPWD Biological and Conservation Data System (BCD) does not include a representative inventory of rare resources in the state. Although it is based on the best data **available** to TPWD regarding rare species, the data from the BCD do not provide a definitive statement as to the presence, absence, or condition of special species, natural communities, or other significant features in your project area. These data cannot substitute for an on-site evaluation by your qualified biologists. The BCD information is intended to assist you in avoiding harm to species that may occur on your site.

I hope this fulfills your need for confirmation of collection of the most recent information available on January 4, 2002, and apparently remains current today, January 23, 2002.

Sincerely,

Dorinda Scott, Information System Manager  
Texas Biological and Conservation Data System  
Wildlife Diversity Branch, Wildlife Division

4200 SMITH SCHOOL ROAD  
AUSTIN, TEXAS 78744-3291  
512-389-4800

[www.tpwd.state.tx.us](http://www.tpwd.state.tx.us)

Enclosure

132A-2

TEXAS BIOLOGICAL AND CONSERVATION DATA SYSTEM  
TEXAS PARKS AND WILDLIFE DEPARTMENT  
23 JAN 2002

N. : BUFO HOUSTONENSIS

COMMON NAME: HOUSTON TOAD

OTHER NAME:

FEDERAL STATUS: LE

STATE STATUS: E

GLOBAL RANK: G1

STATE RANK: S1

IDENTIFIED: Y TRACK: Y

SENSITIVITY:

COUNTY: Freestone

USGS TOPO MAPS:

TOPO QUAD:

MARGIN #:

LANELY

3109651

3

ELEMENT OCCURRENCE NUMBER: 016

DATE LAST OBSERVED: 1990-10-16

PRECISION: S

DATE FIRST OBSERVED: 1990

OCCURRENCE RANK:

DATE SURVEYED: 1990-10-16

SURVEY COMMENTS:

MANAGED AREAS:

CONTAINED:

DIRECTIONS:

APPROXIMATELY 8 KILOMETERS SOUTH AND 5 KILOMETERS EAST OF LANELY BY  
COUNTY ROADS, EAST SIDE OF COUNTY ROAD AND EAST SIDE OF TRIANGLE  
DRIVEWAY

DESCRIPTION:

POST-OAK AND SANDJACK WOODLAND

QUALITATIVE/QUANTITATIVE DATA:

MANAGEMENT COMMENTS:

PROTECTION COMMENTS:

OTHER COMMENTS:

A SINGLE FEMALE TAKEN AT 1215 HOURS; SPECIMEN PRESERVED (TO BE  
DEPOSITED AT TMM) AFTER H, L, K, M TISSUES TAKEN FOR ELECTROPHORESIS

SOURCE OF INFORMATION:

YANTIS, JAMES H. 1990. PERSONAL COMMUNICATION.

TEXAS BIOLOGICAL AND CONSERVATION DATA SYSTEM  
TEXAS PARKS AND WILDLIFE DEPARTMENT  
12 FEB 2002

NAME: ABRONIA MACROCARPA

COMMON NAME: LARGE-FRUITED SAND-VERBENA

OTHER NAME:

FEDERAL STATUS: LE

STATE STATUS: E

GLOBAL RANK: G2

STATE RANK: S2

IDENTIFIED: Y

TRACK: Y

SENSITIVITY:

COUNTY: Leon

USGS TOPO MAPS:

TOPO QUAD:

MARGIN #:

ROUND PRAIRIE

3109633

1

ELEMENT OCCURRENCE NUMBER: 004

DATE LAST OBSERVED: 1994

PRECISION: S

DATE FIRST OBSERVED: 1994

OCCURRENCE RANK:

DATE SURVEYED:

SURVEY COMMENTS:

MANAGED AREAS:

CONTAINED:

DIRECTIONS:

1.4 MILES NORTH ON HIGHWAY 1146 FROM THE JUNCTION OF HIGHWAY 1146 AND  
UNNAMED EASTBOUND COUNTY ROAD IN LONG HOLLOW; PLANTS CA. 1300 FEET  
EAST OF ROAD

DESCRIPTION:

QUALITATIVE/QUANTITATIVE DATA:

100 PLANTS

MANAGEMENT COMMENTS:

PROTECTION COMMENTS:

OTHER COMMENTS:

SOURCE OF INFORMATION:

YANTIS, JIM. NO DATE. ROUTE 1, BOX 611, HEARNE, TEXAS 77859;  
409/279-2048.

TEXAS BIOLOGICAL AND CONSERVATION DATA SYSTEM  
TEXAS PARKS AND WILDLIFE DEPARTMENT  
12 FEB 2002

NAME: ABRONIA MACROCARPA

COMMON NAME: LARGE-FRUITED SAND-VERBENA

OTHER NAME:

FEDERAL STATUS: LE

STATE STATUS: E

GLOBAL RANK: G2

STATE RANK: S2

IDENTIFIED: Y

TRACK: Y

SENSITIVITY:

COUNTY: Freestone

USGS TOPO MAPS:

TOPO QUAD:

MARGIN #:

LANELY

3109651

3

ELEMENT OCCURRENCE NUMBER: 003

DATE LAST OBSERVED: 1996-04

PRECISION: S

DATE FIRST OBSERVED: 1990

OCCURRENCE RANK:

DATE SURVEYED:

SURVEY COMMENTS:

MANAGED AREAS:

CONTAINED:

DIRECTIONS:

5.5 MILES SOUTH OF LANELY, TEXAS ON COUNTY ROAD 1848, THEN 2.8 AIR  
MILES EAST OF CONCORD

DESCRIPTION:

OPEN SAND FIELD WITH LIGHT COVER OF SLENDER THREE-AWN GRASS (ARISTIDA  
LONGESPICA); FLAT SAND, NOT DUNE SAND

QUALITATIVE/QUANTITATIVE DATA:

PERSONAL COMMUNICATION FROM JIM YANTIS; "THOUSANDS OF PLANTS"; 1996,  
ESTIMATED POPULATION 3000-4000

MANAGEMENT COMMENTS:

PROTECTION COMMENTS:

OTHER COMMENTS:

THREATENED BY CONVERSION TO COASTAL BERMUDA (CYNODON DACTYLON); IN  
GENETIC STUDY, 5 SUBPOPULATIONS SAMPLED (10 INDIVIDUALS EACH)

SOURCE OF INFORMATION:

YANTIS, JAMES H. 1990. PERSONAL COMMUNICATION. TEXAS PARKS & WILDLIFE  
DEPARTMENT, ROUTE 1, BOX 611, HEARNE, TEXAS 77859, PHONE:  
409/279-2048.

TEXAS BIOLOGICAL AND CONSERVATION DATA SYSTEM  
TEXAS PARKS AND WILDLIFE DEPARTMENT  
12 FEB 2002

NAME: HALIAEETUS LEUCOCEPHALUS

COMMON NAME: BALD EAGLE

OTHER NAME:

FEDERAL STATUS: LT-PDL

STATE STATUS: T

GLOBAL RANK: G4

STATE RANK: S3B,S3N

IDENTIFIED: Y TRACK: Y

SENSITIVITY: Y

COUNTY: Limestone

USGS TOPO MAPS:

TOPO QUAD:

MARGIN #:

FARRAR

3109643

1

ELEMENT OCCURRENCE NUMBER: 026

DATE LAST OBSERVED: 1990

PRECISION: G

DATE FIRST OBSERVED: 1981

OCCURRENCE RANK:

DATE SURVEYED:

SURVEY COMMENTS:

MANAGED AREAS:

CONTAINED:

DIRECTIONS:

LIMESTONE RESERVOIR, LIMESTONE COUNTY

DESCRIPTION:

LAKE SHORE, FORESTED

QUALITATIVE/QUANTITATIVE DATA:

NEST #147-1A: 1982-1983 INACTIVE, 1984 NEST FELL; NEST #147-1B:  
1987-1989 INACTIVE, 1990 NEST FELL

MANAGEMENT COMMENTS:

PROTECTION COMMENTS:

OTHER COMMENTS:

SOURCE OF INFORMATION:

MITCHELL, MARK. 1997. MEMO TO SHANNON BRESLIN OF 30 JULY 1997  
PROVIDING BALD EAGLE NESTING DATA, INCLUDING COUNTY MAPS WITH  
ESTIMATED TERRITORIES.

TEXAS BIOLOGICAL AND CONSERVATION DATA SYSTEM  
TEXAS PARKS AND WILDLIFE DEPARTMENT  
12 FEB 2002

NAME: HALIAEETUS LEUCOCEPHALUS

COMMON NAME: BALD EAGLE

OTHER NAME:

FEDERAL STATUS: LT-PDL

STATE STATUS: T

GLOBAL RANK: G4

STATE RANK: S3B,S3N

IDENTIFIED: Y TRACK: Y

SENSITIVITY: Y

COUNTY: Robertson  
Leon

USGS TOPO MAPS:

TOPO QUAD:

MARGIN #:

ROUND PRAIRIE

3109633

2

ELEMENT OCCURRENCE NUMBER: 041

DATE LAST OBSERVED: 1999

PRECISION: S

DATE FIRST OBSERVED: 1994

OCCURRENCE RANK:

DATE SURVEYED:

SURVEY COMMENTS:

MANAGED AREAS:

CONTAINED:

DIRECTIONS:

NORTHEAST OF ROUND PRAIRIE

DESCRIPTION:

QUALITATIVE/QUANTITATIVE DATA:

ONE BALD EAGLE NEST, WITH NESTING BALD EAGLES IN 1994; NEST #198-3A:  
1994 ACTIVE NEST PRODUCED 2 YOUNG, 1995 ACTIVE NEST PRODUCED 3 YOUNG,  
1996-1997 ACTIVE NEST PRODUCED 2 YOUNG, 1998 ACTIVE NEST PRODUCED 3  
YOUNG, 1999 ACTIVE NEST PRODUCED 2 YOUNG

MANAGEMENT COMMENTS:

PROTECTION COMMENTS:

OTHER COMMENTS:

THE MARATHON OIL COMPANY HAS CHOSEN AN ALTERNATIVE SITE FOR ITS  
OPERATION; THE NEW SITE IS OUTSIDE THE ONE-MILE MANAGEMENT ZONE FOR  
THE NESTING BALD EAGLES; TPWD NEST #198-3A

SOURCE OF INFORMATION:

MITCHELL, MARK. 1999. PROJECT NO. 30: BALD EAGLE NEST SURVEY AND  
MANAGEMENT. PERFORMANCE REPORT. AUGUST 31, 1999.

TEXAS BIOLOGICAL AND CONSERVATION DATA SYSTEM  
TEXAS PARKS AND WILDLIFE DEPARTMENT  
12 FEB 2002

NAME: SPIRANTHES PARKSII

COMMON NAME: NAVASOTA LADIES' -TRESSES

OTHER NAME:

FEDERAL STATUS: LE

STATE STATUS: E

GLOBAL RANK: G3

STATE RANK: S3

IDENTIFIED: Y TRACK: Y

SENSITIVITY:

COUNTY: Freestone

USGS TOPO MAPS:

TOPO QUAD:

MARGIN #:

DONIE

3109642

2

ELEMENT OCCURRENCE NUMBER: 097

DATE LAST OBSERVED: 1991

PRECISION: S

DATE FIRST OBSERVED:

OCCURRENCE RANK:

DATE SURVEYED:

SURVEY COMMENTS:

MANAGED AREAS:

CONTAINED:

DIRECTIONS:

CA. 2600 FEET (BY AIR) NORTH OF STATE ROUTE 164, CA. 4.3 ROAD MILES  
EAST OF RAILROAD TRACKS ON EAST SIDE OF DONIE; JUST SOUTHWEST OF TANK  
MARKED ON TOPO; ALSO ON NORTHWEST SIDE OF DRAIN ON WEST SIDE OF SAME  
TANK

DESCRIPTION:

OPENING IN POST OAK WOODLAND; ALSO ON SEEP ZONE ON SOUTHWEST SIDE OF  
TANK, WHERE IT OCCURS WITH ERIOCAULON SP., ETC.

QUALITATIVE/QUANTITATIVE DATA:

28 PLANTS SEEN BY SEVERINSON IN 1991; THREE GROUPS OF 3 PLANTS EACH ON  
NORTHWEST SIDE OF DRAIN - TYPICAL; 19 PLANTS IMMEDIATELY SOUTHWEST OF  
TANK ON SEEPAGE SLOPE WITH ERIOCAULON; ERIOCAULON KOERNICKIANUM AT 400  
FEET NEARBY

MANAGEMENT COMMENTS:

PROTECTION COMMENTS:

OTHER COMMENTS:

SOURCE OF INFORMATION:

SEVERINSON, D. 1992. PERSONAL COMMUNICATION. CONVERSATION WITH J.  
POOLE AND W.R. CARR, 29 JANUARY 1992.

TEXAS BIOLOGICAL AND CONSERVATION DATA SYSTEM  
TEXAS PARKS AND WILDLIFE DEPARTMENT  
30 JAN 2002

NAME: CYPERUS GRAYIODES

COMMON NAME: MOHLENBROCK'S UMBRELLA-SEDGE

OTHER NAME:

FEDERAL STATUS:

STATE STATUS:

GLOBAL RANK: G3

STATE RANK: S3

IDENTIFIED: Y TRACK: W

SENSITIVITY:

COUNTY: Freestone

USGS TOPO MAPS:

TOPO QUAD:

MARGIN #:

DONIE

3109642

1

ELEMENT OCCURRENCE NUMBER: 011

DATE LAST OBSERVED: 1988-07-11

PRECISION: S

DATE FIRST OBSERVED:

OCCURRENCE RANK:

DATE SURVEYED: 1988-07-11

SURVEY COMMENTS:

MANAGED AREAS:

CONTAINED:

DIRECTIONS:

JUST NORTH OF OLD ZION CEMETERY, CA. 0.4 MILE SOUTH OF TX164 AT A  
POINT 6.2 MILES WEST OF BUFFALO (LEON COUNTY) ALONG HEADWATERS OF RENA  
BRANCH

DESCRIPTION:

SANDHILL WOODLAND-BARRENS

QUALITATIVE/QUANTITATIVE DATA:

MANAGEMENT COMMENTS:

PROTECTION COMMENTS:

OTHER COMMENTS:

ORZELL #7347 (ILL, NCU, SMU, TEX)

SOURCE OF INFORMATION:

BRIDGES, E.L. AND S.L. ORZELL. 1989. ADDITIONS AND NOTEWORTHY VASCULAR  
PLANT COLLECTIONS FROM TEXAS AND LOUISIANA, WITH HISTORICAL,  
ECOLOGICAL, AND GEOGRAPHIC NOTES. PHYTOLOGIA 66(1):12-69.

TEXAS BIOLOGICAL AND CONSERVATION DATA SYSTEM  
TEXAS PARKS AND WILDLIFE DEPARTMENT  
30 JAN 2002

NAME: COREOPSIS INTERMEDIA

COMMON NAME: GOLDEN WAVE TICKSEED

OTHER NAME:

FEDERAL STATUS:

STATE STATUS:

GLOBAL RANK: G3

STATE RANK: S3

IDENTIFIED: Y TRACK: W

SENSITIVITY:

COUNTY: Leon

USGS TOPO MAPS:

TOPO QUAD:

MARGIN #:

DONIE

3109642

3

ELEMENT OCCURRENCE NUMBER: 030

DATE LAST OBSERVED: 1989-06-08

PRECISION: S

DATE FIRST OBSERVED:

OCCURRENCE RANK:

DATE SURVEYED:

SURVEY COMMENTS:

MANAGED AREAS:

CONTAINED:

DIRECTIONS:

JUST NORTH OF GRAVEL ROAD CROSSING OF NEEDHAM MARSH BRANCH, 3.5 MILES  
NORTH OF U.S. 79 AT JEWETT VIA DIVISION STREET

DESCRIPTION:

XERIC BLUEJACK OAK-POST OAK SANDHILL WOODLANDS/SAND BARRENS; GEOLOGY -  
CARRIZO SAND (EOCENE)

QUALITATIVE/QUANTITATIVE DATA:

MANAGEMENT COMMENTS:

PROTECTION COMMENTS:

OTHER COMMENTS:

SOURCE OF INFORMATION:

ORZELL, S.L. AND E.L. BRIDGES. (#10502). 1989. SPECIMEN # NONE TEX-LL.

TEXAS BIOLOGICAL AND CONSERVATION DATA SYSTEM  
TEXAS PARKS AND WILDLIFE DEPARTMENT  
30 JAN 2002

NAME: COREOPSIS INTERMEDIA

COMMON NAME: GOLDEN WAVE TICKSEED

OTHER NAME:

FEDERAL STATUS:

STATE STATUS:

GLOBAL RANK: G3

STATE RANK: S3

IDENTIFIED: Y

TRACK: W

SENSITIVITY:

COUNTY: Freestone

USGS TOPO MAPS:

TOPO QUAD:

MARGIN #:

DONIE

3109642

4

ELEMENT OCCURRENCE NUMBER: 036

DATE LAST OBSERVED: 1995-08-19

PRECISION: S

DATE FIRST OBSERVED: 1995-08-19

OCCURRENCE RANK: B

DATE SURVEYED: 1995-08-19

SURVEY COMMENTS:

MANAGED AREAS:

CONTAINED:

DIRECTIONS:

FROM JUNCTION OF STATE ROUTES 80 AND 164 AT DONIE, GO EAST 4.5 MILES  
ON 164, PLANTS ON NORTH SIDE OF ROAD

DESCRIPTION:

ROADSIDE FLAT SANDHILL; BLUEJACK OAK-POSTOAK-BLACKJACK OAK;  
RIGHT-OF-WAY AND ADJACENT LAND

QUALITATIVE/QUANTITATIVE DATA:

< 100 PLANTS IN FLOWER AND FRUIT ON 19 AUGUST 1995

MANAGEMENT COMMENTS:

PROTECTION COMMENTS:

OTHER COMMENTS:

SOURCE OF INFORMATION:

SINGHURST, JASON RAY. 1996. MASTER'S THESIS. THE STATUS OF NINE  
ENDANGERED PLANTS OF EAST TEXAS: HISTORICAL, ECOLOGICAL, AND  
PHYTOGEOGRAPHICAL NOTES. STEPHEN F. AUSTIN STATE UNIVERSITY, AUGUST  
1996.

TEXAS BIOLOGICAL AND CONSERVATION DATA SYSTEM  
TEXAS PARKS AND WILDLIFE DEPARTMENT  
30 JAN 2002

NAME: ERIOCAULON KOERNICKIANUM  
COMMON NAME: SMALL-HEADED PIPEWORT  
OTHER NAME:  
FEDERAL STATUS:  
GLOBAL RANK: G2  
IDENTIFIED: Y TRACK: Y  
COUNTY: Leon  
Freestone

STATE STATUS:  
STATE RANK: S1  
SENSITIVITY:

USGS TOPO MAPS: DONIE TOPO QUAD: 3109642 MARGIN #: 5

ELEMENT OCCURRENCE NUMBER: 004 DATE LAST OBSERVED: 1984?  
PRECISION: G DATE FIRST OBSERVED:  
OCCURRENCE RANK: X? DATE SURVEYED:  
SURVEY COMMENTS: PROBABLY DESTROYED BY STRIP MINING

MANAGED AREAS: CONTAINED:

DIRECTIONS:  
JEWETT MINE SITE

DESCRIPTION:  
HILLSIDE BOGS - SEEPAGE SLOPES WITH PARTIALLY OPEN POST OAK CANOPY

QUALITATIVE/QUANTITATIVE DATA:  
TWO POPULATIONS OBSERVED, PROBABLY DESTROYED BY STRIP MINE ACTIVITIES

MANAGEMENT COMMENTS:

PROTECTION COMMENTS:

OTHER COMMENTS:

SOURCE OF INFORMATION:  
AJILVSGI, GEYATA. 1984. DISCUSSION WITH TINA ALLDAY-BONDY, JULY 25,  
1984.

TEXAS BIOLOGICAL AND CONSERVATION DATA SYSTEM  
TEXAS PARKS AND WILDLIFE DEPARTMENT  
30 JAN 2002

NAME: ULMUS AMERICANA-CELTIS SPP SERIES

COMMON NAME: AMERICAN ELM-HACKBERRY SERIES

OTHER NAME: CONFLUENCE OF BUFFALO AND LINN CREEK

FEDERAL STATUS: STATE STATUS:

GLOBAL RANK: G4 STATE RANK: S4

IDENTIFIED: Y TRACK: Y SENSITIVITY:

COUNTY: Freestone

USGS TOPO MAPS: TOPO QUAD: MARGIN #:  
DEW 3109652 1

ELEMENT OCCURRENCE NUMBER: 003 DATE LAST OBSERVED:

PRECISION: G DATE FIRST OBSERVED:

OCCURRENCE RANK: DATE SURVEYED:

SURVEY COMMENTS: USF&WS PRIORITY 3

MANAGED AREAS: CONTAINED:

DIRECTIONS:

CONFLUENCE OF BUFFALO AND LINN CREEKS ABOUT 2 MILES WEST OF INTERSTATE  
45 AND 3 MILES NORTH OF HIGHWAY 164

DESCRIPTION:

SOME GOOD OLD GROWTH WATER OAK-BASSWOOD-AMERICAN ELM-SUGARBERRY-PECAN  
WITH UPLAND POST OAK INCLUSIONS; MAY BE PECAN-SUGARBERRY

QUALITATIVE/QUANTITATIVE DATA:

TRINITY RIVER SYSTEM

MANAGEMENT COMMENTS:

PROTECTION COMMENTS:

OTHER COMMENTS:

BASED ON JIM NEAL'S USF&WS BOTTOMLAND HARDWOOD REPORT; NEEDS FIELD  
CHECKING

SOURCE OF INFORMATION:

USF&WS, USDOI. 1985-05. TEXAS BOTTOMLAND HARDWOOD PRESERVATION  
PROGRAM: FINAL CONCEPT PLAN. USF&WS, ALBUQUERQUE, NM.

Federal  
 Status      State  
 Status

**\*\*\*AMPHIBIANS \*\*\***

**Houston Toad (*Bufo houstonensis*)** - endemic; species sandy substrate, water in pools, ephemeral pools, stock tanks; breeds in spring especially after rains; burrows in soil when inactive; breeds February-June; found associated with soils of the Carrizo, Goliad, Queen City, Recklaw, Sparta, Willis, and Weches geologic formations      LE      E

**\*\*\* BIRDS \*\*\***

**Arctic Peregrine Falcon (*Falco peregrinus tundrius*)** - due to similar field characteristics, treat all Peregrine Falcons as federal listed Endangered; potential migrant      DL      T

**Bald Eagle (*Haliaeetus leucocephalus*)** - found primarily near seacoasts, rivers, and large lakes; nests in tall trees or on cliffs near water; communally roosts, especially in winter; hunts live prey, scavenges, and pirates food from other birds      LT-PDL      T

**Henslow's Sparrow (*Ammodramus henslowii*)** - wintering individuals (not flocks) found in weedy fields or cut-over areas where lots of bunch grasses occur along with vines and brambles; a key component is bare ground for running/walking

**Interior Least Tern (*Sterna antillarum athalassos*)** - nests along sand and gravel bars within braided streams and rivers; also known to nest on man-made structures      LE      E

**Whooping Crane (*Grus americana*)** - potential migrant      LE      E

**Wood Stork (*Mycteria americana*)** - forages in prairie ponds, flooded pastures or fields, ditches, and other shallow standing water, including salt-water; usually roosts communally in tall snags, sometimes in association with other wading birds (i.e. active heronries); breeds in Mexico and birds move into Gulf States in search of mud flats and other wetlands, even those associated with forested areas; formerly nested in Texas, but no breeding records since 1960      T

**\*\*\* MAMMALS \*\*\***

**Plains Spotted Skunk (*Spilogale putorius interrupta*)** - catholic; open fields, prairies, croplands, fence rows, farmyards, forest edges, and woodlands; prefers wooded, brushy areas and tallgrass prairie

**Rafinesque's Big-Eared Bat (*Corynorhinus rafinesquii*)** - roosts in cavity trees of bottomland hardwoods, concrete culverts, and abandoned man-made structures      T

**Southeastern Myotis (*Myotis austroriparius*)** - roosts in cavity trees of bottomland hardwoods, concrete culverts, and abandoned man-made structures

**\*\*\* REPTILES \*\*\***

**Texas Garter Snake (*Thamnophis sirtalis annectens*)** - wet or moist microhabitats are conducive to the species occurrence, but is not necessarily restricted to them; hibernates underground or in or under surface cover; breeds March-August

**Texas Horned Lizard (*Phrynosoma cornutum*)** - open, arid and semi-arid regions with sparse vegetation, including grass, cactus, scattered brush or scrubby trees; soil may vary in texture from sandy to rocky; burrows into soil, enters rodent burrows, or hides under rock when inactive; breeds March-September      T

**Timber/Canebrake Rattlesnake (*Crotalus horridus*)** - swamps, floodplains, upland pine and deciduous woodlands, riparian zones, abandoned farmland; limestone bluffs, sandy soil or black clay; prefers dense ground cover, i.e. grapevines or palmetto      T

## FREESTONE COUNTY

Federal Status	State Status
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### \*\*\* VASCULAR PLANTS \*\*\*

<p><b>Large-fruited sand verbena (<i>Abronia macrocarpa</i>)</b> - endemic; deep, somewhat excessively drained sandy soils in openings in post oak woodlands, sometimes in active sand blowouts; flowering April-June (-October)</p>	LE	E
<p><b>Navasota ladies'-tresses (<i>Spiranthes parksii</i>)</b> - endemic; margins of and openings within post oak woodlands in sandy loams along intermittent tributaries of rivers; flowering late October-early November</p>	LE	E

LE, LT - Federally Listed Endangered/Threatened  
 PE, PT - Federally Proposed Endangered/Threatened  
 E/SA, T/SA - Federally Endangered/Threatened by Similarity of Appearance  
     C1 - Federal Candidate, Category 1; information supports proposing to list as endangered/threatened  
 DL, PDL - Federally Delisted/Proposed Delisted  
 E, T - State Endangered/Threatened  
 "blank" - Rare, but with no regulatory listing status

*Species appearing on these lists do not share the same probability of occurrence. Some species are migrants or wintering residents only, or may be historic or considered extirpated.*

Federal Status	State Status
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**\*\*\*AMPHIBIANS\*\*\***

<b>Houston Toad (<i>Bufo houstonensis</i>)</b> - endemic; species sandy substrate, water in pools, ephemeral pools, stock tanks; breeds in spring especially after rains; burrows in soil when inactive; breeds February-June; found associated with soils of the Carrizo, Goliad, Queen City, Recklaw, Sparta, Willis, and Weches geologic formations	LE	E
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**\*\*\* BIRDS \*\*\***

<b>Arctic Peregrine Falcon (<i>Falco peregrinus tundrius</i>)</b> - due to similar field characteristics, treat all Peregrine Falcons as federal listed Endangered; potential migrant	DL	T
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<b>Bald Eagle (<i>Haliaeetus leucocephalus</i>)</b> - found primarily near seacoasts, rivers, and large lakes; nests in tall trees or on cliffs near water; communally roosts, especially in winter; hunts live prey, scavenges, and pirates food from other birds	LT-PDL	T
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<b>Henslow's Sparrow (<i>Ammodramus henslowii</i>)</b> - wintering individuals (not flocks) found in weedy fields or cut-over areas where lots of bunch grasses occur along with vines and brambles; a key component is bare ground for running/walking		
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<b>Whooping Crane (<i>Grus americana</i>)</b> - potential migrant	LE	E
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<b>Wood Stork (<i>Mycteria americana</i>)</b> - forages in prairie ponds, flooded pastures or fields, ditches, and other shallow standing water, including salt-water; usually roosts communally in tall snags, sometimes in association with other wading birds (i.e. active heronries); breeds in Mexico and birds move into Gulf States in search of mud flats and other wetlands, even those associated with forested areas; formerly nested in Texas, but no breeding records since 1960		T
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**\*\*\* MAMMALS \*\*\***

<b>Plains Spotted Skunk (<i>Spilogale putorius interrupta</i>)</b> - catholic; open fields, prairies, croplands, fence rows, farmyards, forest edges, and woodlands; prefers wooded, brushy areas and tallgrass prairie		
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<b>Rafinesque's Big-Eared Bat (<i>Corynorhinus rafinesquii</i>)</b> - roosts in cavity trees of bottomland hardwoods, concrete culverts, and abandoned man-made structures		T
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<b>Southeastern Myotis (<i>Myotis austroriparius</i>)</b> - roosts in cavity trees of bottomland hardwoods, concrete culverts, and abandoned man-made structures		
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**\*\*\* REPTILES \*\*\***

<b>Texas Garter Snake (<i>Thamnophis sirtalis annectens</i>)</b> - wet or moist microhabitats are conducive to the species occurrence, but is not necessarily restricted to them; hibernates underground or in or under surface cover; breeds March-August		
--	--	--

<b>Texas Horned Lizard (<i>Phrynosoma cornutum</i>)</b> - open, arid and semi-arid regions with sparse vegetation, including grass, cactus, scattered brush or scrubby trees; soil may vary in texture from sandy to rocky; burrows into soil, enters rodent burrows, or hides under rock when inactive; breeds March-September		T
---	--	---

<b>Timber/Canebrake Rattlesnake (<i>Crotalus horridus</i>)</b> - swamps, floodplains, upland pine and deciduous woodlands, riparian zones, abandoned farmland; limestone bluffs, sandy soil or black clay; prefers dense ground cover, i.e. grapevines or palmetto		T
--	--	---

## LEON COUNTY

Federal Status	State Status
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### \*\*\* VASCULAR PLANTS \*\*\*

<p><b>Large-fruited sand verbena</b> (<i>Abronia macrocarpa</i>) - endemic; deep, somewhat excessively drained sandy soils in openings in post oak woodlands, sometimes in active sand blowouts; flowering April-June (-October)</p>	LE	E
<p><b>Navasota ladies'-tresses</b> (<i>Spiranthes parksii</i>) - endemic; margins of and openings within post oak woodlands in sandy loams along intermittent tributaries of rivers; flowering late October-early November</p>	LE	E
<p><b>Parks' jointweed</b> (<i>Polygonella parksii</i>) - endemic; deep loose sands of Carrizo and similar Eocene formations, including disturbed areas; flowering spring-summer</p>		
<p><b>Sandhill woollywhite</b> (<i>Hymenopappus carrizoanus</i>) - endemic; open areas in deep sands derived from Carrizo and similar Eocene formations, including disturbed areas; flowering late spring-fall</p>		
<p><b>Small-headed pipewort</b> (<i>Eriocaulon koernickianum</i>)- wet acid sands of upland seeps and bogs, often on sphagnum mats with little other vegetative cover; flowering/fruiting late May-late June</p>		

LE, LT - Federally Listed Endangered/Threatened  
 PE, PT - Federally Proposed Endangered/Threatened  
 E/SA, T/SA - Federally Endangered/Threatened by Similarity of Appearance  
 C1 - Federal Candidate, Category 1; information supports proposing to list as endangered/threatened  
 DL, PDL - Federally Delisted/Proposed Delisted  
 E, T - State Endangered/Threatened  
 "blank" - Rare, but with no regulatory listing status

*Species appearing on these lists do not share the same probability of occurrence. Some species are migrants or wintering residents only, or may be historic or considered extirpated.*

## LIMESTONE COUNTY

Federal Status	State Status
-------------------	-----------------

### \*\*\* BIRDS \*\*\*

- |  |        |   |
|--|--------|---|
| <b>Arctic Peregrine Falcon</b> ( <i>Falco peregrinus tundrius</i> ) - due to similar field characteristics, treat all Peregrine Falcons as federal listed Endangered; potential migrant  | DL     | T |
| <b>Bald Eagle</b> ( <i>Haliaeetus leucocephalus</i> ) - found primarily near seacoasts, rivers, and large lakes; nests in tall trees or on cliffs near water; communally roosts, especially in winter; hunts live prey, scavenges, and pirates food from other birds   | LT-PDL | T |
| <b>Henslow's Sparrow</b> ( <i>Ammodramus henslowii</i> ) - wintering individuals (not flocks) found in weedy fields or cut-over areas where lots of bunch grasses occur along with vines and brambles; a key component is bare ground for running/walking; likely to occur, but few records within this county |        |   |
| <b>Interior Least Tern</b> ( <i>Sterna antillarum athalassos</i> ) - nests along sand and gravel bars within braided streams and rivers; also known to nest on man-made structures   | LE     | E |
| <b>Migrant Loggerhead Shrike</b> ( <i>Lanius ludovicianus migrans</i> ) - open and semi-open grassy areas with scattered trees and brush; breeding March-late August   |        |   |
| <b>Western Burrowing Owl</b> ( <i>Athene cunicularia hypugaea</i> ) - open grasslands, especially prairie, plains, and savanna, sometimes in open areas such as vacant lots near human habitation or airports; nests and roosts in abandoned burrows   |        |   |
| <b>White-faced Ibis</b> ( <i>Plegadis chihi</i> ) - prefers freshwater marshes, sloughs, and irrigated rice fields, but will attend brackish and saltwater habitats; nests in marshes, in low trees, on the ground in bulrushes or reeds, or on floating mats  |        | T |
| <b>Whooping Crane</b> ( <i>Grus americana</i> ) - potential migrant  | LE     | E |

### \*\*\*FISHES\*\*\*

- Smalleye shiner** (*Notropis buccula*) - endemic to upper Brazos River system and its tributaries; apparently introduced into adjacent Colorado River drainage; medium to large prairie streams with sandy substrate and turbid to clear warm water; presumably eats small aquatic invertebrates

### \*\*\* MAMMALS \*\*\*

- Cave Myotis Bat** (*Myotis velifer*) - colonial and cave-dwelling; also roosts in rock crevices, old buildings, carports, under bridges, and even in abandoned Cliff Swallow (*Hirundo pyrrhonota*) nests; roosts in clusters of up to thousands of individuals; hibernates in limestone caves of Edwards Plateau and gypsum cave of Panhandle during winter; opportunistic insectivore
- Plains Spotted Skunk** (*Spilogale putorius interrupta*) - catholic; open fields, prairies, croplands, fence rows, farmyards, forest edges, and woodlands; prefers wooded, brushy areas and tallgrass prairie

### \*\*\* REPTILES \*\*\*

- Texas Garter Snake** (*Thamnophis sirtalis annectens*) - wet or moist microhabitats are conducive to the species occurrence, but is not necessarily restricted to them; hibernates underground or in or under surface cover; breeds March-August
- Texas Horned Lizard** (*Phrynosoma cornutum*) - open, arid and semi-arid regions with sparse vegetation, including grass, cactus, scattered brush or scrubby trees; soil may vary in texture from sandy to rocky; burrows into soil, enters rodent burrows, or hides under rock when inactive; breeds March-September

## LIMESTONE COUNTY

Federal      State  
Status      Status

**Timber/Canebrake Rattlesnake (*Crotalus horridus*)** - swamps, floodplains, upland pine and deciduous woodlands, riparian zones, abandoned farmland, limestone bluffs; sandy soil or black clay; prefers dense ground cover, i.e. grapevines or palmetto

T

### \*\*\*VASCULAR PLANTS\*\*\*

**Small-headed pipewort (*Eriocaulon koernickianum*)** – wet acid sands of upland seeps and bogs, often on sphagnum mats with little other vegetative cover, usually associated with post oak woodlands; also in native prairies or along stream banks; flowering/fruiting late May-late June

LE, LT - Federally Listed Endangered/Threatened

PE, PT - Federally Proposed Endangered/Threatened

E/SA, T/SA - Federally Endangered/Threatened by Similarity of Appearance

C1 - Federal Candidate, Category 1; information supports proposing to list as endangered/threatened

DL, PDL - Federally Delisted/Proposed Delisted

E, T - State Endangered/Threatened

“blank” - Rare, but with no regulatory listing status

***Species appearing on these lists do not share the same probability of occurrence. Some species are migrants or wintering residents only, or may be historic or considered extirpated.***



November 10, 2006

COMMISSIONERS

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ROBERT L. COOK  
EXECUTIVE DIRECTOR

Mr. James M. Wiersema  
Horizon Environmental Services, Inc.  
P.O. Box 162017  
Austin, Texas 78716

Dear Mr. Wiersema:

Regarding the proposed FutureGen Heart of Brazos Project I would like to offer addition information concerning the construction plans.

You need to be aware that the proposed carbon dioxide pipelines will be routed through some of the best remaining wildlife habitat corridors in that part of northern Leon and southern Freestone Counties. In addition, the pipeline will cross 15 properties under wildlife management plans and bisect the Friendship Community Wildlife Management Association.

It is vital that proper consideration be given to the possible adverse effects of this construction on wildlife habitat in order to minimize or mitigate these effects.

Thank you for the opportunity to review and comment on this project. If you have any additional questions, please let me know.

Sincerely,

David Sierra  
District 5 Leader  
Wildlife Division



Take a kid  
hunting or fishing



Visit a state park  
or historic site

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**Jim Wiersema**

---

**From:** Beth Helms Seaton [BSeaton@tceq.state.tx.us]  
**Sent:** Friday, October 13, 2006 4:39 PM  
**To:** Jim Wiersema  
**Cc:** Earl Lott; L'oreal Stepney  
**Subject:** FutureGen

Dear Mr. Wiersema,

Thank you for your letters dated October 6, 2006, requesting information concerning resources that could be utilized to determine existing contamination in aquatic plants and animals on the proposed Heart of Brazos and Odessa proposed development sites for the proposed FutureGen Project. Your letter stated that you reviewed the TCEQ 2004 Texas 303 (d) list and the TCEQ 2004 Water Quality Assessment for Individual Water Bodies as resources listing existing contamination in aquatic plants and animals within the 5-mile region of influence of the proposed power plant sites. You requested the disclosure of any additional potential resources concerning existing contamination that was not listed in your letter. The Water Quality Division uses the 303(d) list referenced above for information regarding contamination in aquatic plants and animals and does not have any additional site specific information. No 303(d) listing issues have been identified in the general vicinity of these proposed sites.

In a phone conversation with you on 10/11/06, you indicated that no effluent discharge is being proposed at this time. If it becomes apparent that an effluent discharge is necessary, a discharge permit may be required and the applicant would need to determine the point of discharge, the amount of wastewater expected to be discharged, and the types of wastewater expected to be discharged. Permit limits for oxygen demanding substances (i.e. Carbonaceous BOD<sub>5</sub> and Ammonia-Nitrogen) should be expected for wastewater streams containing potentially elevated concentrations of these constituents. This could include process wastewater as well as cooling tower blowdown if treated domestic wastewater is used as makeup water. Information on the expected concentrations of these constituents, and any other pollutants used in the process water would need to be estimated and submitted during the permit application process so that modeling can be performed to assess the impact of the wastewater on dissolved oxygen concentrations in any streams receiving this effluent. In addition, the waters that the discharge would enter would need to be characterized. To do this the applicant would need to determine the point of discharge and identify the unclassified water bodies along the course (discharge route) for at least three miles downstream and determine the classified segment that the discharge would eventually meet. If the discharge is directly to a classified segment, then the aquatic life uses will be defined by that segment. Next, the applicant should characterize the unclassified water bodies (streams, lakes, or ponds) along the discharge route. This involves determining whether streams in the discharge route are perennial, intermittent with perennial pools, or intermittent. In any of these water bodies, for sites where available information indicates that the presumed uses and criteria in the standards for unclassified streams may be inappropriate, additional data may be obtained by the TCEQ or the applicant in the form of a "receiving water assessment."

Please let me know if you need additional information. As stated above, if it becomes apparent that an effluent discharge is necessary, we would be happy to meet with you if needed to discuss any permitting issues, process, or the application if needed.

Sincerely,

10/25/2006

Beth Seaton, Special Assistant  
Water Quality Division  
512-239-2526



TEXAS  
HISTORICAL  
COMMISSION

*The State Agency for Historic Preservation*

RICK PERRY, GOVERNOR

JOHN L. NAU, III, CHAIRMAN

F. LAWRENCE OAKS, EXECUTIVE DIRECTOR

October 31, 2006

Russ Brownlow  
Cultural Resources Director  
Horizon Environmental Services, Inc.  
P.O. Box 162017  
Austin, TX 78716

Re: Project review under Section 106 of the National Historic Preservation Act of 1966  
FutureGen Project, Proposed Heart of Brazos Site Areas of New Construction (DOE)

Dear Mr. Brownlow:

Thank you for your correspondence describing the above referenced project. This letter serves as comment on the proposed federal undertaking from the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission.

The review staff, led by Bill Martin, has examined our records. We concur with your assessment that archeological surveys are unnecessary for the Waterline Corridors east and west of the plant. We also concur with your recommendations for the proposed CO<sub>2</sub> Pipeline Corridors. Specifically, we concur that no cultural resources surveys are required for segments A-C and B-C. We also concur that all remaining segments (C-D, D-E, D-F, F-G, F-H, and H-I) require cultural resources surveys.

The work should meet the minimum archeological survey standards posted on-line at [www.thc.state.tx.us](http://www.thc.state.tx.us). A report of investigations should be produced in conformance with the Secretary of the Interior's Guidelines for Archaeology and Historic Preservation, and submitted to this office for review. In addition, any buildings 50 years old or older that are located on or adjacent to the tract should be documented with photographs and included in the report. You may obtain lists of archeologists in Texas on-line at: [www.counciloftexasarcheologists.org](http://www.counciloftexasarcheologists.org) or [www.rpanet.org](http://www.rpanet.org). Please note that other potentially qualified archeologists not included on these lists may be used.

Thank you for your cooperation in this federal review process, and for your efforts to preserve the irreplaceable heritage of Texas. **If you have any questions concerning our review or if we can be of further assistance, please contact Bill Martin at 512/463-5867.**

Sincerely,

A handwritten signature in cursive script, appearing to read "F. Lawrence Oaks".

for  
F. Lawrence Oaks, State Historic Preservation Officer

FLO/wam

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TEXAS  
HISTORICAL  
COMMISSION

*The State Agency for Historic Preservation*

RICK PERRY, GOVERNOR

JOHN L. NAU, III, CHAIRMAN

F. LAWERENCE OAKS, EXECUTIVE DIRECTOR

October 31, 2006

Russ Brownlow  
Cultural Resources Director  
Horizon Environmental Services, Inc.  
P.O. Box 162017  
Austin, TX 78716

Re: Project review under Section 106 of the National Historic Preservation Act of 1966  
FutureGen Project, Proposed Heart of Brazos Sequestration Reservoirs (DOE)

Dear Mr. Brownlow:

Thank you for your correspondence describing the above referenced project. This letter serves as comment on the proposed federal undertaking from the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission.

The review staff, led by Bill Martin, has examined our records. We concur with your assessment that archeological surveys are needed for both the Northern and the Southern Sequestration Reservoirs.

The work should meet the minimum archeological survey standards posted on-line at [www.thc.state.tx.us](http://www.thc.state.tx.us). A report of investigations should be produced in conformance with the Secretary of the Interior's Guidelines for Archaeology and Historic Preservation, and submitted to this office for review. In addition, any buildings 50 years old or older that are located on or adjacent to the tract should be documented with photographs and included in the report. You may obtain lists of archeologists in Texas on-line at: [www.counciloftexasarcheologists.org](http://www.counciloftexasarcheologists.org) or [www.rpanet.org](http://www.rpanet.org). Please note that other potentially qualified archeologists not included on these lists may be used.

Thank you for your cooperation in this federal review process, and for your efforts to preserve the irreplaceable heritage of Texas. **If you have any questions concerning our review or if we can be of further assistance, please contact Bill Martin at 512/463-5867.**

Sincerely,

A handwritten signature in cursive script, appearing to read "William D. Martin".

for

F. Lawrence Oaks, State Historic Preservation Officer

FLO/wam

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Office of  
Road and Bridge Department  
Engineer - T. L. KANTOR, P. E.



P. O. Box 101  
Groesbeck, Texas 76642  
Office - 254-729-5513

STATE OF TEXAS  
**Limestone County**  
GROESBECK, TEXAS

May 22, 2006

Scott W. Tinker, Ph.D.  
Director  
Bureau of Economic Geology  
The University of Texas at Austin  
University Station, Box X  
Austin, Texas 78713-8924

Subject: Heart of Brazos Site Flood Hazard clarification

Dear Dr. Tinker,

Per your request, I have reviewed the proposed FutureGen site as it relates to potential floodplain conflicts. The site in question is located in Limestone, Freestone, and Leon Counties.

I have reviewed the most recent Flood Hazard Boundary Maps available for Limestone County and for Freestone County. Interpretation of said maps reveals that no areas of the proposed site that are situated in Limestone or Freestone Counties lie within the area of a 100 year flood.

The area of Leon County in which a portion of the subject site is located is currently unmapped with regard to Flood Hazard Boundary Maps. Floodplain determination, therefore, must be made via alternate methods.

In this case, consultation of the NRCS Soil Survey for Leon County shows that the soils on the subject site all having a flooding frequency class of "none". The definition of said flooding frequency class is that of having 0% chance of flooding in any given year, or less than 1 time in 500 years. Based upon this information, it is my opinion that no areas of the proposed site that are situated in Leon County lie within the area of the 100 year flood.

If you have any questions regarding my determination, please feel free to give me a call.

Sincerely,

*Ted Kantor, 05/22/2006*

Ted L. Kantor, P.E.  
Limestone County Engineer  
Limestone County Floodplain Administrator



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*U.S. Department of Energy*

*National Energy Technology Laboratory*



December 6, 2006

, Chief  
Tribal  
Address  
City, state, zip

Re: Executive Memo (4/29/1994): "Government to Government Relations"  
Executive Order 13175 (11/6/2000): Consultation and Coordination with Indian Tribal Governments,  
Section 106 of the National Historic Preservation Act and  
NAGPRA Consultation for the Environmental Impact Statement for Implementation of the  
FutureGen Project

Dear :

The U.S. Department of Energy (DOE) is preparing an Environmental Impact Statement (EIS) for the proposed FutureGen Project, which would receive Federal cost-share funding for up to \$700 million on a \$950 million (total, in 2004 dollars) project. The project would comprise the planning, design, construction and operation of a research and development power plant by the FutureGen Alliance, Inc. (a not-for-profit organization). A Notice of Intent to prepare the EIS was published in the Federal Register / Vol. 71, No. 145 / Friday, July 28, 2006. The FutureGen Project would feature a coal-fueled electric power and hydrogen gas (H<sub>2</sub>) production plant integrated with carbon dioxide (CO<sub>2</sub>) capture and geologic sequestration of the captured gas. Four sites have been identified as reasonable alternatives: (1) Mattoon, Illinois; (2) Tuscola, Illinois; (3) Jewett, Texas; and (4) Odessa, Texas.

In accordance with the referenced Executive Orders and Acts, DOE would like to solicit your input on the project to determine if your tribe has any concerns or issues about the project. In particular, we are interested in learning whether or not this project has the potential to impact any significant archeological, religious or cultural sites. DOE is requesting that you (or your designated representative) submit to my office any concerns or issues you may have or notify my office if you are aware of any significant archeological, religious, or cultural sites within the areas of potential impact.

To assist in your review, the enclosed maps illustrate the potential areas where construction impacts may occur. Impacts to archeological resources (if present) could occur as a result of site development and other land-disturbing activities from the project. In addition, DOE is considering the potential for impacts related to visual or atmospheric resources associated with potential air emissions. The following discussion provides a more detailed description of the project.

## FutureGen Project Processes

The 275-MW FutureGen power plant would employ advanced coal gasification technology integrated with combined cycle electricity generation, H<sub>2</sub> production, CO<sub>2</sub> capture, and sequestration of the captured gas in geologic repositories. The gasification process would combine coal, oxygen (O<sub>2</sub>), and steam to produce a H<sub>2</sub>-rich “synthesis gas.” After exiting the conversion reactor, the composition of the synthesis gas would be “shifted” to produce additional H<sub>2</sub>. The product stream would consist mostly of H<sub>2</sub>, steam, and CO<sub>2</sub>. Following separation of these three gas components, the H<sub>2</sub> would be used to generate electricity in a gas turbine and/or fuel cell. Some of the H<sub>2</sub> could be used as a feedstock for chemical plants or petroleum refineries or as a transportation fuel. Steam from the process could be condensed, treated, and recycled into the gasifier or added to the plant’s cooling water circuit. CO<sub>2</sub> from the process would be sequestered in deep underground geologic formations that would be monitored to verify the permanence of CO<sub>2</sub> storage.

## Technology Alternatives

As a research and development project, FutureGen would incorporate cutting-edge and emerging technologies ready for full-scale or subscale testing prior to their commercial deployment. Identification of technology alternatives is currently in progress for key components: gasification, O<sub>2</sub> production, H<sub>2</sub> production, synthesis gas cleanup, H<sub>2</sub> turbines, CO<sub>2</sub> capture, byproduct utilization, and others. Decisions on incorporation of specific technologies would be made by the Alliance consistent with the overall project goal of proving the technical and economic feasibility of the near-zero emissions concept. It is expected that sequestration would be accomplished using existing state-of-the-art technologies for both transmission and injection of the CO<sub>2</sub> stream. Various technologies would be considered for monitoring at the injection sites.

We are very interested in receiving your concerns about possible effects of the project on archeological, religious, or cultural sites that are considered significant to your tribe. If you have questions, please do not hesitate to call, (304-285-4426).

In addition, please sign the signature line below and return a signed copy to my attention if you (or your designated representative) want to continue to receive information about the project or if you wish to provide review comments on the Section 106 or NEPA documents. DOE would appreciate your response by January 4, 2007.

Sincerely,

Mark L. McKoy  
NEPA Document Manager  
U.S. DOE

### Attachments:

- Maps of alternative sites
- Notice of Intent

RESPONSE REQUESTED:

Yes, we wish to continue to receive information and participate in the consultation process.

No we do not wish to continue to receive information or participate in the consultation process.

By: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

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# United States Department of the Interior

## BUREAU OF INDIAN AFFAIRS

Southern Plains Regional Office  
P.O. Box 368  
Anadarko, Oklahoma 73005

IN REPLY REFER TO:  
Natural Resources

DEC 29 2006

Mark L. McKoy  
NEPA Document Manager  
U.S. DOE  
National Energy Technology Laboratory  
3610 Collins Ferry Road  
Morgantown, WV 26507-0880

Dear Mr. McKoy:

Thank you for the opportunity to review the documentation describing the proposed FutureGen Project. The closest alternative sites where this office might have some input are the Jewett and Odessa, Texas sites.

A review of the maps of these project alternative locations indicates that there are no tribal or Individual Indian trust lands within the areas of potential effect. The Bureau of Indian Affairs has no jurisdiction within the alternative project areas in the Jewett or Odessa areas. However, Tribes that have historic ties to the area may have some concern if the project has a potential to impact sites of importance in their histories or cultural traditions. We recommend that you contact the Kiowa Tribe of Oklahoma, the Comanche Nation, the Wichita and Affiliated Tribes, and the Mescalero Apache Tribe regarding the Odessa alternative and the Alabama-Coushatta Tribe of Texas, and the Caddo Nation regarding the Jewett alternative.

Sincerely,

Acting Regional Director

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# United States Department of the Interior

## BUREAU OF INDIAN AFFAIRS

Eastern Oklahoma Regional Office

P.O. Box 8002

Muskogee, OK 74402-8002

IN REPLY REFER TO:

Division of Environmental  
Safety and Cultural Resources

Mr. Mark L. McKoy  
U.S. Department of Energy  
P. O. Box 880  
Morgantown, West Virginia 26507-0880

JAN 22 2007

Dear Mr. McKoy:

On December 11, 2006, the Bureau of Indian Affairs (BIA), Eastern Oklahoma Regional Office (EORO), received an information request from the U.S. Department of Energy (USDOE) regarding significant impacts to archeological, religious or cultural sites from the construction and operation of a coal-fueled electric power and Hydrogen gas (H<sub>2</sub>) production plant located in Illinois or Texas. The EORO has no comments regarding the project.

The projects in Illinois are within the jurisdictional area of the Bureau's Eastern Region and the projects in Texas are within the jurisdiction area of the Bureau's Southern Plains Region. Both Regions have been provided the notice by copy of this letter. As the other two Regions may have environmental and/or cultural resources concerns relating to the project, it is recommended that the USDOE coordinate directly with them on any of their concerns. The contact addresses are:

Franklin Keel, Regional Director  
Eastern Regional Office  
545 Marriott Drive, Suite 700  
Nashville, Tennessee 37214

Dan Deerinwater, Regional Director  
Southern Plains Regional Office  
P.O. Box 368  
Anadarko, Oklahoma 73005-0368

If any additional information is required, please contact Mr. Bob Coleman, Division Chief, Division of Environmental, Safety and Cultural Resources, EORO, at (918) 781-4660.

Respectfully,

Regional Director

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## **A.4 ODESSA**

The following agencies sent coordination letters:

- U.S. Fish and Wildlife Service
- Texas Parks and Wildlife Department
- Texas Commission on Environmental Quality
- Texas Historical Commission
- U.S. Department of Energy
- Bureau of Indian Affairs

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# United States Department of the Interior

## FISH AND WILDLIFE SERVICE

10711 Burnet Road, Suite 200

Austin, Texas 78758

512 490-0057

FAX 490-0974



**OCT 20 2006**

Mr. James Wiersema  
Horizon Environmental Services, Inc.  
P.O. Box 162017  
Austin, Texas 78716

Consultation Number 21450-2007-TA-0024

Dear Mr. Wiersema:

This is in response to your letter dated October 6, 2006, requesting review on the proposed site locations for the FutureGen project. Your conversation with my staff on October 16, 2006, clarified the level of review you were requesting. Our review did not result in any additional information other than that obtained from our web site (see below for address). Enclosed is a list of the U.S. Fish and Wildlife Service (Service) threatened and endangered species by county that the FutureGen project may impact if implemented. This list is organized by the counties you have indicated as potential sites for the project. We are providing this information to assist you in assessing and avoiding impacts to federally listed threatened and endangered species, their habitat, and designated wetlands. Further consultation with us may be necessary should this project go forward.

### Federally listed species

The proposed project site is not located within designated critical habitat of any federally listed threatened or endangered species. You may access a list of federally listed or proposed species by county of occurrence in Texas at <http://ifw2es.fws.gov/EndangeredSpecies/lists/>. A searchable database with information related to the life history and ecology of each of these species can be found at <http://endangered.fws.gov/>.

Generally, the Service believes that the first step in determining impacts to endangered species is presence/absence surveys conducted within the project area by persons with appropriate biological expertise. Often, absence of endangered species is determined and the project can then proceed without additional responsibilities under the Endangered Species Act of 1973, as amended (Act). If assessments indicate that suitable habitat is likely to be affected either directly or indirectly, we recommend that you consult with us further. If any endangered species or their habitats are present, the project can often be modified to avoid all impacts. Please send any completed surveys or habitat assessments to our office for assistance in evaluating potential effects.

TAKE PRIDE<sup>®</sup>  
IN AMERICA 

If impacts cannot be avoided, we recommend the Department of Energy (DOE) pursue formal consultation through section 7 of the Act. Section 7 requires that all Federal agencies consult with the Service to ensure that the actions authorized, funded, or carried out by such agencies do not jeopardize the continued existence of any threatened or endangered species or adversely modify or destroy critical habitat of such species. It is the primary responsibility of DOE, as the Federal action agency, to determine whether any action it authorizes, funds, or carries out may affect a federally listed or proposed species.

### Candidate Species

We also recommend that you review the potential for your project to affect candidates. Candidate species are those that are being considered for possible addition to the threatened and endangered species list. There is sufficient information on biological vulnerability and threat(s) to support issuance of a proposal to list, but higher priority listings currently preclude issuance of a proposed rule for those species. Candidate species currently have no legal protection. If you find your project may potentially impact these species, the Service would like to provide technical assistance to help avoid or minimize adverse effects. Addressing these species at this stage could better provide for overall ecosystem health in the local area and may avert potential future listing.

### State-listed species

The State of Texas also protects certain species of plants and animals. Contact the Texas Parks and Wildlife Department (Endangered Resources Branch), Fountain Park Plaza Building, Suite 100, 3000 South IH-35, Austin, Texas 78704 (512-912-7011) for information concerning fish, wildlife, and plants of State concern.

### Wetlands and Native Habitats

If your project will involve filling, dredging, or trenching of a wetland or riparian area it may require a Section 404 permit from the U.S. Army Corps of Engineers. For permitting requirements under Section 404 of the Clean Water Act, please contact the Fort Worth District, Permits Section, CESWF-EV-0, P.O. Box 17300, Fort Worth, Texas, 76102-0300, 817-978-2681.

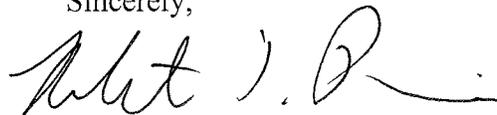
Wetlands and riparian zones provide valuable fish and wildlife habitat as well as contribute to flood control, water quality enhancement, and groundwater recharge. Wetland and riparian vegetation provides food and cover for wildlife, stabilizes banks, and decreases soil erosion. These areas are inherently dynamic and very sensitive to changes caused by such activities as overgrazing, logging, major construction, or earth disturbance. Construction activities near such areas should be carefully designed to minimize impacts. If vegetation clearing is needed in riparian areas, these areas should be revegetated with native wetland and riparian vegetation to prevent erosion or loss of habitat. We recommend minimizing the area of soil scarification and initiating incremental reestablishment of herbaceous vegetation at the proposed work sites. Denuded and/or disturbed areas should be revegetated with a mixture of native legumes and

grasses. Species commonly used for soil stabilization are listed in the Texas Department of Agriculture's (TDA) Native Tree and Plant Directory, available from TDA at P.O. Box 12847, Austin, Texas, 78711.

We also urge you to take all precautions to ensure sediment loading does not occur to receiving streams in the project area. To prevent and/or minimize soil erosion and compaction associated with construction activities, avoid any unnecessary clearing of vegetation, and follow established rights-of-way whenever possible. All machinery and petroleum products should be stored outside the floodplain and/or wetland area during construction to prevent possible contamination of water and soils. No permanent structures should be placed in the 100-year floodplain.

We thank you for your concern for endangered and threatened species and other natural resources, and we appreciate the opportunity to comment on the proposed project. If we can be of further assistance or answer questions about these comments, please contact William Amy at 512-490-0057, extension 234. Please refer to the Service Consultation number listed above in any future correspondence regarding this project.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert T. Pine". The signature is fluid and cursive, with a long horizontal stroke at the end.

Robert T. Pine  
Supervisor

Enclosures

Federally Listed as Threatened and Endangered Species of Texas  
September 27, 2006

This list represents species that may be found in counties throughout the Austin Ecological Services office's area of responsibility. Please contact the Austin ES office (U.S. Fish and Wildlife Service, 10711 Burnet Rd., Suite 200, Austin, Texas 78758, 512/490-0057) if additional information is needed.

**DISCLAIMER**

This list is based on information available to the U.S. Fish and Wildlife Service at the time of preparation. This list is subject to change, without notice, as new biological information is gathered and should not be used as the sole source for identifying species that may be impacted by a project.

Migratory Species Common to many or all Counties: Species listed specifically in a county have confirmed sightings. If a species is not listed they may occur as migrants in those counties.

Least tern	(E ~)	<i>Sterna antillarum</i>
Whooping crane	(E w/CH)	<i>Grus americana</i>
Bald eagle	(T)	<i>Haliaeetus leucocephalus</i>
Piping plover	(T w/CH)	<i>Charadrius melodus</i>

**Andrews County**

Sand dune lizard	(C)	<i>Sceloporus arenicolus</i>
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**Freestone County**

Least tern	(E ~)	<i>Sterna antillarum</i>
Large-fruited sand-verbena	(E)	<i>Abronia macrocarpa</i>
Navasota ladies'-tresses	(E)	<i>Spiranthes parksii</i>
Bald eagle	(T)	<i>Haliaeetus leucocephalus</i>

**Leon County**

Least tern	(E ~)	<i>Sterna antillarum</i>
Houston toad	(E w/CH)	<i>Bufo houstonensis</i>
Large-fruited sand-verbena	(E)	<i>Abronia macrocarpa</i>
Navasota ladies'-tresses	(E)	<i>Spiranthes parksii</i>
Bald eagle	(T)	<i>Haliaeetus leucocephalus</i>

**Limestone County**

Bald eagle	(T)	<i>Haliaeetus leucocephalus</i>
Least tern	(E ~)	<i>Sterna antillarum</i>
Navasota ladies'-tresses (E)	<i>Spiranthes parksii</i>	

**Pecos County**

Black-capped vireo	(E)	<i>Vireo atricapilla</i>
Pecos gambusia	(E)	<i>Gambusia nobilis</i>
Leon Springs pupfish	(E w/CH)	<i>Cyprinodon bovinus</i>
Pecos (=puzzle) sunflower	(T)	<i>Helianthus paradoxus</i>
Pecos assiminea snail	(E w/CH)	<i>Assiminea pecos</i>
DiamondY Spring snail	(C)	<i>Tryonia adamantina</i>
Gonzales springsnail	(C)	<i>Tryonia stocktonensis</i>

**Winkler County**  
Sand dune lizard

(C)

*Sceloporus arenicolus*

## INDEX

- E = Species in danger of extinction throughout all or a significant portion of its range.
- T = Species which is likely to become endangered within the foreseeable future throughout all or a significant portion of its range.
- C = Species for which the Service has on file enough substantial information to warrant listing as threatened or endangered. These species currently have no legal protection. However, addressing these species at this stage could better provide for overall ecosystem health in the local area and may avert potential future listing.
- CH = Critical Habitat (in Texas unless annotated ‡)
- P/ = Proposed ...
- P/E = Species proposed to be listed as endangered.
- P/T = Species proposed to be listed as threatened.
- TSA = Threatened due to similarity of appearance. Protections of the Act, such as consultation requirements for Federal agencies under section 7, and recovery planning provisions under section 4(f), do not apply to species listed under similarity of appearance provisions.
- = with special rule
- ‡ = CH designated (or proposed) outside Texas
- ~ = protection restricted to populations found in the “interior” of the United States. In Texas, the least tern receives full protection, except within 50 miles (80 km) of the Gulf Coast.

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19 October 2006

Mr. James M. Wiersema  
Vice President  
Horizon Environmental Services  
P. O. Box 162017  
Austin, TX 78716

Dear Mr. Wiersema,

I have reviewed the information you provided on the proposed FutureGen Project. Your examination of Texas Parks and Wildlife Department and US Fish and Wildlife Service records should have provided you with the most current information available. It is my opinion based upon the location and scope of work to be completed that there will be no negative impacts to threatened or endangered species of wildlife or their habitats.

I appreciate the opportunity to comment on this proposed project and the material provided by Horizon Environmental Services.

Thank You,



Philip Dickerson  
District Wildlife Biologist  
Texas Parks and Wildlife  
4500 W. Illinois Ste 203  
Midland, TX 79703  
432-520-1581

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**Jim Wiersema**

---

**From:** Beth Helms Seaton [BSeaton@tceq.state.tx.us]  
**Sent:** Friday, October 13, 2006 4:39 PM  
**To:** Jim Wiersema  
**Cc:** Earl Lott; L'oreal Stepney  
**Subject:** FutureGen

Dear Mr. Wiersema,

Thank you for your letters dated October 6, 2006, requesting information concerning resources that could be utilized to determine existing contamination in aquatic plants and animals on the proposed Heart of Brazos and Odessa proposed development sites for the proposed FutureGen Project. Your letter stated that you reviewed the TCEQ 2004 Texas 303 (d) list and the TCEQ 2004 Water Quality Assessment for Individual Water Bodies as resources listing existing contamination in aquatic plants and animals within the 5-mile region of influence of the proposed power plant sites. You requested the disclosure of any additional potential resources concerning existing contamination that was not listed in your letter. The Water Quality Division uses the 303(d) list referenced above for information regarding contamination in aquatic plants and animals and does not have any additional site specific information. No 303(d) listing issues have been identified in the general vicinity of these proposed sites.

In a phone conversation with you on 10/11/06, you indicated that no effluent discharge is being proposed at this time. If it becomes apparent that an effluent discharge is necessary, a discharge permit may be required and the applicant would need to determine the point of discharge, the amount of wastewater expected to be discharged, and the types of wastewater expected to be discharged. Permit limits for oxygen demanding substances (i.e. Carbonaceous BOD<sub>5</sub> and Ammonia-Nitrogen) should be expected for wastewater streams containing potentially elevated concentrations of these constituents. This could include process wastewater as well as cooling tower blowdown if treated domestic wastewater is used as makeup water. Information on the expected concentrations of these constituents, and any other pollutants used in the process water would need to be estimated and submitted during the permit application process so that modeling can be performed to assess the impact of the wastewater on dissolved oxygen concentrations in any streams receiving this effluent. In addition, the waters that the discharge would enter would need to be characterized. To do this the applicant would need to determine the point of discharge and identify the unclassified water bodies along the course (discharge route) for at least three miles downstream and determine the classified segment that the discharge would eventually meet. If the discharge is directly to a classified segment, then the aquatic life uses will be defined by that segment. Next, the applicant should characterize the unclassified water bodies (streams, lakes, or ponds) along the discharge route. This involves determining whether streams in the discharge route are perennial, intermittent with perennial pools, or intermittent. In any of these water bodies, for sites where available information indicates that the presumed uses and criteria in the standards for unclassified streams may be inappropriate, additional data may be obtained by the TCEQ or the applicant in the form of a "receiving water assessment."

Please let me know if you need additional information. As stated above, if it becomes apparent that an effluent discharge is necessary, we would be happy to meet with you if needed to discuss any permitting issues, process, or the application if needed.

Sincerely,

10/25/2006

Beth Seaton, Special Assistant  
Water Quality Division  
512-239-2526



TEXAS  
HISTORICAL  
COMMISSION

*The State Agency for Historic Preservation*

RICK PERRY, GOVERNOR

JOHN L. NAU, III, CHAIRMAN

F. LAWRENCE OAKS, EXECUTIVE DIRECTOR

October 31, 2006

Russ Brownlow  
Cultural Resources Director  
Horizon Environmental Services, Inc.  
P.O. Box 162017  
Austin, TX 78716

Re: Project review under Section 106 of the National Historic Preservation Act of 1966  
FutureGen Project, Proposed Odessa Site Areas of New Construction (DOE)

Dear Mr. Brownlow:

Thank you for your correspondence describing the above referenced project. This letter serves as comment on the proposed federal undertaking from the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission.

The review staff, led by Bill Martin, has examined our records. We concur with your assessment that archeological surveys are necessary for the CO<sub>2</sub> Pipeline Corridors east of the Injection Site and west of the Injection Site, and that no archeological survey is needed for the CO<sub>2</sub> Pipeline Corridor near the plant. We also concur that the Potential Transmission Line Corridor north of the plant does not need to be surveyed, but that all other Potential Transmission Line Corridors and Waterline Corridors will require cultural resources surveys.

The work should meet the minimum archeological survey standards posted on-line at [www.thc.state.tx.us](http://www.thc.state.tx.us). A report of investigations should be produced in conformance with the Secretary of the Interior's Guidelines for Archaeology and Historic Preservation, and submitted to this office for review. In addition, any buildings 50 years old or older that are located on or adjacent to the tract should be documented with photographs and included in the report. You may obtain lists of archeologists in Texas on-line at: [www.counciloftexasarcheologists.org](http://www.counciloftexasarcheologists.org) or [www.rpanet.org](http://www.rpanet.org). Please note that other potentially qualified archeologists not included on these lists may be used.

Thank you for your cooperation in this federal review process, and for your efforts to preserve the irreplaceable heritage of Texas. **If you have any questions concerning our review or if we can be of further assistance, please contact Bill Martin at 512/463-5867.**

Sincerely,

A handwritten signature in black ink, appearing to read "F. Lawrence Oaks".

for  
F. Lawrence Oaks, State Historic Preservation Officer

FLO/wam

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TEXAS  
HISTORICAL  
COMMISSION

*The State Agency for Historic Preservation*

RICK PERRY, GOVERNOR

JOHN L. NAU, III, CHAIRMAN

F. LAWRENCE OAKS, EXECUTIVE DIRECTOR

October 31, 2006

Russ Brownlow  
Cultural Resources Director  
Horizon Environmental Services, Inc.  
P.O. Box 162017  
Austin, TX 78716

Re: Project review under Section 106 of the National Historic Preservation Act of 1966  
FutureGen Project, Proposed Odessa Site Sequestration Reservoirs (DOE)

Dear Mr. Brownlow:

Thank you for your correspondence describing the above referenced project. This letter serves as comment on the proposed federal undertaking from the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission.

The review staff, led by Bill Martin, has examined our records. We concur with your assessment that an archeological survey is necessary. We believe that a professional archeologist should survey the study area, paying particular attention to areas within 100 m of the drainages.

The work should meet the minimum archeological survey standards posted on-line at [www.thc.state.tx.us](http://www.thc.state.tx.us). A report of investigations should be produced in conformance with the Secretary of the Interior's Guidelines for Archaeology and Historic Preservation, and submitted to this office for review. In addition, any buildings 50 years old or older that are located on or adjacent to the tract should be documented with photographs and included in the report. You may obtain lists of archeologists in Texas on-line at: [www.counciloftexasarcheologists.org](http://www.counciloftexasarcheologists.org) or [www.rpanet.org](http://www.rpanet.org). Please note that other potentially qualified archeologists not included on these lists may be used.

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Sincerely,

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for

F. Lawrence Oaks, State Historic Preservation Officer

FLO/wam

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*U.S. Department of Energy*

*National Energy Technology Laboratory*



December 6, 2006

, Chief  
Tribal  
Address  
City, state, zip

Re: Executive Memo (4/29/1994): "Government to Government Relations"  
Executive Order 13175 (11/6/2000): Consultation and Coordination with Indian Tribal Governments,  
Section 106 of the National Historic Preservation Act and  
NAGPRA Consultation for the Environmental Impact Statement for Implementation of the  
FutureGen Project

Dear :

The U.S. Department of Energy (DOE) is preparing an Environmental Impact Statement (EIS) for the proposed FutureGen Project, which would receive Federal cost-share funding for up to \$700 million on a \$950 million (total, in 2004 dollars) project. The project would comprise the planning, design, construction and operation of a research and development power plant by the FutureGen Alliance, Inc. (a not-for-profit organization). A Notice of Intent to prepare the EIS was published in the Federal Register / Vol. 71, No. 145 / Friday, July 28, 2006. The FutureGen Project would feature a coal-fueled electric power and hydrogen gas (H<sub>2</sub>) production plant integrated with carbon dioxide (CO<sub>2</sub>) capture and geologic sequestration of the captured gas. Four sites have been identified as reasonable alternatives: (1) Mattoon, Illinois; (2) Tuscola, Illinois; (3) Jewett, Texas; and (4) Odessa, Texas.

In accordance with the referenced Executive Orders and Acts, DOE would like to solicit your input on the project to determine if your tribe has any concerns or issues about the project. In particular, we are interested in learning whether or not this project has the potential to impact any significant archeological, religious or cultural sites. DOE is requesting that you (or your designated representative) submit to my office any concerns or issues you may have or notify my office if you are aware of any significant archeological, religious, or cultural sites within the areas of potential impact.

To assist in your review, the enclosed maps illustrate the potential areas where construction impacts may occur. Impacts to archeological resources (if present) could occur as a result of site development and other land-disturbing activities from the project. In addition, DOE is considering the potential for impacts related to visual or atmospheric resources associated with potential air emissions. The following discussion provides a more detailed description of the project.

## FutureGen Project Processes

The 275-MW FutureGen power plant would employ advanced coal gasification technology integrated with combined cycle electricity generation, H<sub>2</sub> production, CO<sub>2</sub> capture, and sequestration of the captured gas in geologic repositories. The gasification process would combine coal, oxygen (O<sub>2</sub>), and steam to produce a H<sub>2</sub>-rich “synthesis gas.” After exiting the conversion reactor, the composition of the synthesis gas would be “shifted” to produce additional H<sub>2</sub>. The product stream would consist mostly of H<sub>2</sub>, steam, and CO<sub>2</sub>. Following separation of these three gas components, the H<sub>2</sub> would be used to generate electricity in a gas turbine and/or fuel cell. Some of the H<sub>2</sub> could be used as a feedstock for chemical plants or petroleum refineries or as a transportation fuel. Steam from the process could be condensed, treated, and recycled into the gasifier or added to the plant’s cooling water circuit. CO<sub>2</sub> from the process would be sequestered in deep underground geologic formations that would be monitored to verify the permanence of CO<sub>2</sub> storage.

## Technology Alternatives

As a research and development project, FutureGen would incorporate cutting-edge and emerging technologies ready for full-scale or subscale testing prior to their commercial deployment. Identification of technology alternatives is currently in progress for key components: gasification, O<sub>2</sub> production, H<sub>2</sub> production, synthesis gas cleanup, H<sub>2</sub> turbines, CO<sub>2</sub> capture, byproduct utilization, and others. Decisions on incorporation of specific technologies would be made by the Alliance consistent with the overall project goal of proving the technical and economic feasibility of the near-zero emissions concept. It is expected that sequestration would be accomplished using existing state-of-the-art technologies for both transmission and injection of the CO<sub>2</sub> stream. Various technologies would be considered for monitoring at the injection sites.

We are very interested in receiving your concerns about possible effects of the project on archeological, religious, or cultural sites that are considered significant to your tribe. If you have questions, please do not hesitate to call, (304-285-4426).

In addition, please sign the signature line below and return a signed copy to my attention if you (or your designated representative) want to continue to receive information about the project or if you wish to provide review comments on the Section 106 or NEPA documents. DOE would appreciate your response by January 4, 2007.

Sincerely,

Mark L. McKoy  
NEPA Document Manager  
U.S. DOE

### Attachments:

Maps of alternative sites  
Notice of Intent



U.S. Department of Energy

National Energy Technology Laboratory



December 6, 2006

Arturo Senclair, Governor  
Ysleta del Sur Pueblo  
P.O. Box 17579 – Ysleta Station  
El Paso, TX 79917

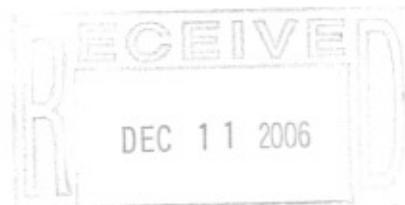
Re: Executive Memo (4/29/1994): "Government to Government Relations"  
Executive Order 13175 (11/6/2000): Consultation and Coordination with Indian Tribal Governments,  
Section 106 of the National Historic Preservation Act and  
NAGPRA Consultation for the Environmental Impact Statement for Implementation of the FutureGen Project

Dear Governor Senclair:

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In accordance with the referenced Executive Orders and Acts, DOE would like to solicit your input on the project to determine if your tribe has any concerns or issues about the project. In particular, we are interested in learning whether or not this project has the potential to impact any significant archeological, religious or cultural sites. DOE is requesting that you (or your designated representative) submit to my office any concerns or issues you may have or notify my office if you are aware of any significant archeological, religious, or cultural sites within the areas of potential impact.

To assist in your review, the enclosed maps illustrate the potential areas where construction impacts may occur. Impacts to archeological resources (if present) could occur as a result of site development and other land-disturbing activities from the project. In addition, DOE is considering the potential for impacts related to visual or atmospheric resources associated with potential air emissions. The following discussion provides a more detailed description of the project.



cc: Javier Loera, Captain

## Technology Alternatives

As a research and development project, FutureGen would incorporate cutting-edge and emerging technologies ready for full-scale or subscale testing prior to their commercial deployment. Identification of technology alternatives is currently in progress for key components: gasification, O<sub>2</sub> production, H<sub>2</sub> production, synthesis gas cleanup, H<sub>2</sub> turbines, CO<sub>2</sub> capture, byproduct utilization, and others. Decisions on incorporation of specific technologies would be made by the Alliance consistent with the overall project goal of proving the technical and economic feasibility of the near-zero emissions concept. It is expected that sequestration would be accomplished using existing state-of-the-art technologies for both transmission and injection of the CO<sub>2</sub> stream. Various technologies would be considered for monitoring at the injection sites.

We are very interested in receiving your concerns about possible effects of the project on archeological, religious, or cultural sites that are considered significant to your tribe. If you have questions, please do not hesitate to call, (304-285-4426).

In addition, please sign the signature line below and return a signed copy to my attention if you (or your designated representative) want to continue to receive information about the project or if you wish to provide review comments on the Section 106 or NEPA documents. DOE would appreciate your response by January 4, 2007.

Sincerely,



Mark L. McKoy  
NEPA Document Manager  
U.S. DOE

### Attachments:

- Maps of alternative sites
- Notice of Intent



# United States Department of the Interior

## BUREAU OF INDIAN AFFAIRS

Southern Plains Regional Office  
P.O. Box 368  
Anadarko, Oklahoma 73005

IN REPLY REFER TO:  
Natural Resources

DEC 29 2006

Mark L. McKoy  
NEPA Document Manager  
U.S. DOE  
National Energy Technology Laboratory  
3610 Collins Ferry Road  
Morgantown, WV 26507-0880

Dear Mr. McKoy:

Thank you for the opportunity to review the documentation describing the proposed FutureGen Project. The closest alternative sites where this office might have some input are the Jewett and Odessa, Texas sites.

A review of the maps of these project alternative locations indicates that there are no tribal or Individual Indian trust lands within the areas of potential effect. The Bureau of Indian Affairs has no jurisdiction within the alternative project areas in the Jewett or Odessa areas. However, Tribes that have historic ties to the area may have some concern if the project has a potential to impact sites of importance in their histories or cultural traditions. We recommend that you contact the Kiowa Tribe of Oklahoma, the Comanche Nation, the Wichita and Affiliated Tribes, and the Mescalero Apache Tribe regarding the Odessa alternative and the Alabama-Coushatta Tribe of Texas, and the Caddo Nation regarding the Jewett alternative.

Sincerely,

Acting Regional Director

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# United States Department of the Interior

## BUREAU OF INDIAN AFFAIRS

Eastern Oklahoma Regional Office

P.O. Box 8002

Muskogee, OK 74402-8002

IN REPLY REFER TO:

Division of Environmental  
Safety and Cultural Resources

Mr. Mark L. McKoy  
U.S. Department of Energy  
P. O. Box 880  
Morgantown, West Virginia 26507-0880

JAN 22 2007

Dear Mr. McKoy:

On December 11, 2006, the Bureau of Indian Affairs (BIA), Eastern Oklahoma Regional Office (EORO), received an information request from the U.S. Department of Energy (USDOE) regarding significant impacts to archeological, religious or cultural sites from the construction and operation of a coal-fueled electric power and Hydrogen gas (H<sub>2</sub>) production plant located in Illinois or Texas. The EORO has no comments regarding the project.

The projects in Illinois are within the jurisdictional area of the Bureau's Eastern Region and the projects in Texas are within the jurisdiction area of the Bureau's Southern Plains Region. Both Regions have been provided the notice by copy of this letter. As the other two Regions may have environmental and/or cultural resources concerns relating to the project, it is recommended that the USDOE coordinate directly with them on any of their concerns. The contact addresses are:

Franklin Keel, Regional Director  
Eastern Regional Office  
545 Marriott Drive, Suite 700  
Nashville, Tennessee 37214

Dan Deerinwater, Regional Director  
Southern Plains Regional Office  
P.O. Box 368  
Anadarko, Oklahoma 73005-0368

If any additional information is required, please contact Mr. Bob Coleman, Division Chief, Division of Environmental, Safety and Cultural Resources, EORO, at (918) 781-4660.

Respectfully,

Regional Director

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## **APPENDIX B PUBLIC SCOPING SUMMARY**

### **B.1 INTRODUCTION**

To ensure that all of the issues related to the FutureGen Project Environmental Impact Statement (EIS) are addressed, DOE invited comments on the proposed scope and content of the EIS from all interested parties. This process, referred to as scoping, began with an Advance Notice of Intent (ANOI) to Prepare an EIS for Implementation of the FutureGen Project published in the *Federal Register* on February 16, 2006, in which the public was requested to provide comments. On July 28, 2006, a Notice of Intent (NOI) was published announcing the four candidate site alternatives identified for evaluation and analysis in the EIS, and the formal public scoping period of July 28 through September 13, 2006, requesting public input. Following the NOI, a Notice of Public Scoping Meetings was published in the *Federal Register* on August 4, 2006, announcing the dates, times and locations of the public scoping meetings (see Section B.2).

The DOE National Energy Technology Laboratory (NETL) conducted the public scoping meetings in which government agencies, private-sector organizations, and the general public were invited to present verbal comments or suggestions with regard to the alternatives and impacts to be considered in the EIS. Scoping meetings were held in August 2006 near each proposed project site (see Table B-1). Oral comments were heard during the scoping meetings and transcribed.

The following issues were listed in the NOI. As part of the EIS process, DOE will address the issues when considering the potential impacts resulting from the siting, construction, and operation of the FutureGen power plant, sequestration site, and associated facilities. The environmental issues include:

- Air quality impacts: potential for air emissions during construction and operation of the power plant and appurtenant facilities to impact local sensitive receptors, local environmental conditions, and special-use areas, including impacts from smog and haze, and impacts from dust and any significant vapor plumes
- Noise and light impacts: potential impacts from construction, transportation of materials, and facility operations
- Traffic issues: potential impacts from construction and operation of the facilities, including changes in local traffic patterns, deterioration of roads, traffic hazards, and traffic controls
- Floodplains: potential impacts to flood flow resulting from earthen fills, access roads, and dikes that might be needed in a floodplain
- Wetlands: potential impacts resulting from fill, sediment deposition, vegetation clearing, and facility erection that might be needed in a wetland
- Visual impacts associated with facility structures: views from neighborhoods, impacts to scenic views (e.g., impacts from water vapor plumes, power transmission lines, pipelines), internal and external perception of the community or locality
- Historic and cultural resources: potential impacts from the site selection, design, construction, and operation of the facilities
- Water quality impacts: potential impacts from water utilization and consumption, and potential impacts from wastewater discharges
- Infrastructure and land use impacts: potential environmental and socioeconomic impacts of project site selection, construction, delivery of feed materials, and distribution of products (e.g., power transmission lines, pipelines)

- Marketability of products and market access to feedstock
- Solid wastes: pollution prevention plans and waste management strategies, including the handling of ash, slag, water treatment sludge, and hazardous materials
- Disproportionate impacts on minority and low-income populations
- Connected actions: potential development of support facilities or supporting infrastructure
- Ecological impacts: potential on-site and off-site impacts to vegetation, terrestrial wildlife, aquatic wildlife, threatened or endangered species, and ecologically sensitive habitats
- Geologic impacts: potential impacts from the sequestration of CO<sub>2</sub> and other captured gases on underground resources such as potable water supplies, mineral resources, and fossil fuel resources
- Ground surface impacts from CO<sub>2</sub> sequestration: potential impacts from leakage of injected CO<sub>2</sub>, potential impacts from induced flows of native fluids to the ground surface or near the ground surface, and the potential for induced ground heave or microseisms
- Fate and stability of sequestered CO<sub>2</sub> and other captured gases
- Health and safety issues associated with CO<sub>2</sub> capture and sequestration
- Cumulative effects that result from the incremental impacts of the proposed project when added to other past, present, and reasonably foreseeable future projects
- Compliance with regulatory requirements and environmental permitting
- Environmental monitoring plans associated with the power plant and with the CO<sub>2</sub> sequestration site
- Mitigation of identified environmental impacts
- Ultimate closure plans for the CO<sub>2</sub> sequestration site and reservoirs

## B.2 PUBLIC SCOPING MEETINGS

DOE held four public scoping meetings for the FutureGen Project EIS; the dates and locations of these meetings are shown in Table B-1. The meeting locations were selected based on their close proximity to the alternative site locations in Texas and Illinois.

**Table B-1. Public Scoping Meeting Locations and Dates**

Location	Date
Jewett (Fairfield), Texas City of Fairfield's Green Barn, Fairfield, Texas	August 22, 2006
Odessa (Midland), Texas Center for Energy and Economic Diversification (CEED) Building, Midland, Texas	August 24, 2006
Tuscola, Illinois Tuscola Community Building, Tuscola, Illinois	August 29, 2006
Mattoon, Illinois Riddle Elementary School, Mattoon, Illinois	August 31, 2006

In addition to the NOI and Notice of Public Scoping Meetings published in the *Federal Register*, DOE published notices in local newspapers during the weeks of August 13, 20, and 27, 2006, as shown in Table B-2. The public scoping period ended on September 13, 2006.

**Table B-2. Dates and Publications for Advertisements**

<b>Meeting Location/ Newspaper</b>	<b>Dates of Publication</b>
<b>Jewett (Fairfield), TX (August 22, 2006)</b>	
The Press	August 17, 2006
The Bryan-College Station Eagle	August 17, 19, 20, and 22, 2006
Jewett Messenger	August 16, 2006
Waco Tribune-Herald	August 17, 2006
Fairfield Recorder	August 17, 2006
<b>Odessa (Midland), TX (August 24, 2006)</b>	
Midland Reporter-Telegram	August 17, 20, and 23, 2006
Andrews County News	August 17 and 20, 2006
The Fort Stockton Pioneer	August 17, 2006
Odessa American	August 17, 20, and 24, 2006
El Seminario	August 17, 2006
<b>Tuscola, IL (August 29, 2006)</b>	
The Tuscola Review	August 22 and 29, 2006
The Regional	August 25, 2006
The Tuscola Journal	August 22, 2006
Tri-County Journal	August 24, 2006
The News-Gazette	August 22, 27, and 28, 2006
<b>Mattoon, IL (August 31, 2006)</b>	
Mattoon Journal Gazette	August 24, 27, and 30, 2006
Charleston Times Courier	August 24, 27, and 30, 2006
Decatur Herald and Review	August 24, 27, and 30, 2006

Each meeting began with an informal open house from 4:00 to 7:00 pm (Daylight Saving Time) during which time attendees were given information packages about the project and were able to view project-related posters. DOE-NETL and FutureGen Project personnel were available to answer questions. Alliance and local representatives were also available at displays illustrating various features of the proposed project and proposed sites.

The informal open house was followed by a formal DOE presentation. The Jewett, Texas meeting began at 7:03 pm and adjourned at 9:32 pm; the Odessa, Texas meeting began at 7:01 pm and adjourned at 9:32 pm; the Tuscola, Illinois meeting began at 7:00 pm and adjourned at 9:34 pm, and the Mattoon, Illinois meeting began at 7:02 pm and adjourned at 10:38 pm. Collectively, 917 individuals attended the public scoping meetings; a few individuals attended more than one meeting (see Table B-3).

**Table B-3. Attendance at Public Scoping Meetings**

Meeting Location	Number of People in Attendance <sup>1</sup>
Jewett (Fairfield), Texas	171
Odessa (Midland), Texas	148
Tuscola, Illinois	234
Mattoon, Illinois	364
<b>Total</b>	<b>917</b>

<sup>1</sup> Based on individuals who signed the attendance sign-in sheets.

All attendees were invited to provide comments, either written or spoken, on the proposed project. Those attendees wishing to speak were given an opportunity to sign up to do so. Comment sheets were made available for all attendees wishing to provide written comments.

DOE-NETL led the presentations and presided over the four formal meetings. A court recorder was present at each meeting to ensure that all spoken comments were recorded and legally transcribed. A total of 132 individuals presented verbal comments (see Table B-4). In addition, individuals could request to receive the Draft EIS, Final EIS, or Summary (hard copy of the full EIS or a hard copy summary plus a compact disk [CD] that contains the entire EIS).

**Table B-4. Verbal Comments Received during the Public Scoping Meetings**

Meeting Location	Number of People who Gave Verbal Comments <sup>1</sup>
Jewett (Fairfield), Texas	30
Odessa (Midland), Texas	24
Tuscola, Illinois	31
Mattoon, Illinois	47
<b>Total</b>	<b>132</b>

<sup>1</sup> Based on transcripts for each meeting.

Anyone who wished to provide comments in writing was invited to do so by completing a comment card at the public scoping meetings and giving it to DOE or a FutureGen team member at the meeting. DOE-NETL also provided an e-mail address for members of the public who preferred to submit their comments electronically, a postal address for those who preferred to mail their comments, a telephone fax number for those who preferred to fax their comments, and a toll-free telephone number for those who preferred to provide spoken comments. In all, 318 comments were submitted via e-mail, mail, fax, or telephone, or at the public meetings (see Table B-5).

**Table B-5. Number of Written Comments Received During the Scoping Period**

<b>Meeting Location</b>	<b>Number of Comments Received<sup>1</sup></b>
Jewett (Fairfield), Texas	47
Odessa (Midland), Texas	195
Tuscola, Illinois	24
Mattoon, Illinois	46
Tuscola and Mattoon <sup>2</sup>	2
Site not Specified	4
<b>Total</b>	<b>318</b>

<sup>1</sup> Includes comments received at public scoping meetings, by electronic mail, facsimile, U.S. Postal Service, or telephone.

<sup>2</sup> Comments were for both the Tuscola and the Mattoon sites, not one site specifically.

### **B.3 PUBLIC COMMENTS AND CONCERNS**

Numerous comments were received with respect to specific natural and human environmental resources. The comments received were consolidated, summarized and categorized as appropriate into major groupings, including general comments about the project, the EIS and the scoping process; purpose and need for the Proposed Action; the Proposed Action; the alternative sites, and resource-specific concerns. Respondents expressed concerns about the need for the proposed FutureGen Project, both from the perspective of electricity demand and from the perspective of whether coal use is the best choice to meet that demand. In particular, some respondents stated that wind energy could be a more viable alternative to generate electricity. Questions were also raised about who would be responsible for monitoring the FutureGen Project. Comments also requested that connected actions such as other proposed development projects and cumulative impacts of reasonably foreseeable projects and the proposed FutureGen Project be considered in the EIS.

The majority of the comments were related to the use of natural resources (e.g., coal, land, water), the discharge of pollutants to the natural environment (e.g. air, water,), and the socioeconomic impacts of the project (e.g. jobs, taxes, property values). Comments were also received relating to wetlands impacts, vehicular and rail traffic, and demands on local community services (e.g., emergency responders, local water systems). Concerns were expressed about the potential for the project to be targeted by a terrorist group. Several comments were expressed about connected actions and the cumulative effects of current industrial activities and future projects planned within the vicinity of the alternative site locations. Respondents requested that project information and details be included in the EIS, including process information, information about the expected efficiency and reliability of the plant, feedstock, utilities and resource requirements, and emissions. Other comments showed concerns relative to the transmission corridors, pipelines and various other features. Questions and concerns were raised regarding the permanence and safety of geologic sequestration of CO<sub>2</sub>. Table B-6 provides a summary of all substantive comments received that relate to the resource-specific areas. This table does not include all of the comments received; rather, it summarizes the general themes of public concern.

**Table B-6. Summary of Comments Received**

<b>Resource Area</b>	<b>Comment</b>
<b>Air Quality</b>	<ul style="list-style-type: none"> <li>• What types and amounts of air pollutants, including mercury, would be emitted by the proposed FutureGen Project?</li> <li>• Consider the air emissions from sources other than the proposed power plant, including coal handling and storage, and construction of additional infrastructure.</li> </ul>
<b>Geology and Soils</b>	<ul style="list-style-type: none"> <li>• The EIS should evaluate what surface/subsurface fault activation may occur due to carbon sequestration.</li> <li>• The EIS should evaluate the impact of potential destruction that may result from a magnitude 5 or higher earthquake or other seismic event from any fault that may possibly impact the plant and the sequestration plan.</li> </ul>
<b>Water Resources and Floodplains</b>	<ul style="list-style-type: none"> <li>• The EIS should address the availability of the water supply.</li> <li>• How much non-point source water pollution would be generated by the FutureGen Project?</li> <li>• How much and where would the FutureGen Project affect floodplains?</li> <li>• What connections of saline aquifers with freshwater aquifers exist where carbon sequestration is proposed for the FutureGen Project?</li> <li>• The EIS should evaluate the impact of this facility on surface and groundwater that flows near or under the plant during construction and operation.</li> </ul>
<b>Wetlands</b>	<ul style="list-style-type: none"> <li>• How much and where would the FutureGen Project affect emergent and forested wetlands?</li> </ul>
<b>Ecological Resources</b>	<ul style="list-style-type: none"> <li>• The EIS should evaluate plant and wildlife that are currently on the endangered species list, including the Texas Horned Toad.</li> <li>• This EIS should include an analysis that quantifies air pollution, noise pollution, wildlife habitat loss, wildlife habitat fragmentation, and other environmental impacts.</li> </ul>
<b>Cultural Resources</b>	<ul style="list-style-type: none"> <li>• The EIS should evaluate archaeology in the area; there are some important Native American sites in this area which must be protected.</li> </ul>
<b>Land Use (including Prime Farmland)</b>	<ul style="list-style-type: none"> <li>• The EIS should evaluate how much land use change would occur due to the FutureGen Project.</li> <li>• The EIS should evaluate how much and where prime farmland would be affected due to the FutureGen Project.</li> </ul>
<b>Aesthetics</b>	<ul style="list-style-type: none"> <li>• The potential visual impacts of the proposed power plant and associated infrastructure (e.g., electrical lines) should be addressed in the EIS.</li> </ul>
<b>Traffic and Transportation</b>	<ul style="list-style-type: none"> <li>• The EIS should evaluate how the FutureGen Project would affect roads in the area or create the need to build more roads or improve roads.</li> <li>• The EIS should evaluate if congestion and connectivity would be affected due to the FutureGen Project.</li> <li>• If coal is to arrive by rail, would current infrastructure support new coal trains? How many trains and coal carloads would arrive per day or week? In many areas we have unguarded rail crossings, and bridges or overpasses that are impractical. What would be the cost of infrastructure improvements to permit this volume of rail traffic to function safely, and without large negative impacts on automobile traffic? What is the net energy yield expected from all this?</li> </ul>

**Table B-6. Summary of Comments Received**

Resource Area	Comment
<b>Noise</b>	<ul style="list-style-type: none"> <li>• An analysis of the noise that would be produced both during construction as well as operation of the plant, transmission lines and any pipelines used to sequester CO<sub>2</sub> should be undertaken including a complete analysis of the impact to any individual with hearing problems who may reside along or near hearing distance from the plant, pipeline, or transmission lines.</li> <li>• The EIS should evaluate noise levels from vibrations and noise generated by the unloading of approximately 200 train car loads of coal per week.</li> </ul>
<b>Utility Systems</b>	<ul style="list-style-type: none"> <li>• The EIS should evaluate what additional infrastructure is needed including pipelines, roads, storage facilities, pumping stations, etc. and the impacts on already damaged environments (for example, fragmentation of prairies, bottomland hardwoods, emergent wetlands, etc.).</li> <li>• The EIS should evaluate if existing transmission towers are sufficient to handle the expected 275 MW of electricity or if additional transmission lines would be required, and at what dollar cost and environmental impact.</li> </ul>
<b>Materials and Waste</b>	<ul style="list-style-type: none"> <li>• Does the FutureGen process generate ash like a normal lignite/Powder River Basin coal burning process? If not, how is it different? What happens to the mercury that generally resides in the lignite/coal? Is it captured for commercial use or disposal or is it somehow utilized in the process? Are there landfill operations needed with the FutureGen process? If so, how would that be handled?</li> <li>• The EIS should evaluate the impact of accumulating piles of ash/slag and sulfur generated by the gasification process until a market outlet for these products is found.</li> <li>• The EIS should evaluate if there is any real market for coal slag, and if the market is large enough to handle all that is expected to be produced. Slag contains silicates and mineral oxides, some of which are hazardous. If not appropriately handled, this would be an "emission" but of the solid rather than aerosolized type. How and where would it be disposed of if required, and at what impact?"</li> <li>• The EIS should include the types and amounts of various chemicals that would be used and stored.</li> </ul>
<b>Health and Safety</b>	<ul style="list-style-type: none"> <li>• With the current situation of globalized terrorism, locating this type of facility in a community would make it vulnerable to a terrorist attack. What plans would be put into place to protect the plant and local citizens? How much in additional resources would be required for police and fire support, and at what cost to taxpayers? Or would this public protection be just left to chance?</li> <li>• The site is located adjacent to a major highway. What is the risk of plant explosion or other accident, and what risks are posed to travelers and local citizens?</li> </ul>
<b>Community Services</b>	<ul style="list-style-type: none"> <li>• The EIS should evaluate how much the FutureGen Project could affect access to social and community services and resources and facilitate movement of emergency services.</li> </ul>
<b>Socioeconomics</b>	<ul style="list-style-type: none"> <li>• The EIS should evaluate how much development and what type of development had occurred before and would occur due to the FutureGen Project.</li> <li>• The EIS should evaluate how much the FutureGen Project would affect commercial/residential growth.</li> <li>• The EIS should evaluate the impact that the FutureGen Project could have on economic growth, including jobs, tax base and land values.</li> </ul>

**Table B-6. Summary of Comments Received**

Resource Area	Comment
<b>Risk Assessment</b>	<ul style="list-style-type: none"> <li>• What leaks from the aquifer system exist or could occur (thousands of oil/gas wells and water wells have been drilled over the past 50 years in Texas and the Gulf Coast) where the FutureGen Project would be located?</li> <li>• What is the potential for CO<sub>2</sub> injection to pressurize fluids already injected into or that naturally exist underground and what would their fate be?</li> <li>• What continuous monitoring program is needed to detect leaks for carbon sequestration systems? What mechanism would ensure that the long-term monitoring program needed for carbon sequestration would exist for an adequate time?</li> <li>• How would DOE ensure that CO<sub>2</sub> storage areas are leak-tight for hundreds/thousands of years?</li> <li>• What is the likelihood that injecting CO<sub>2</sub> underground would reverse subsidence? It is our understanding that subsidence is permanent due to the compression of clay layers underground.</li> <li>• What is the risk that CO<sub>2</sub>-generated acids would weaken the concrete in well casings in the carbon sequestration area?</li> <li>• What are the effects of single/multiple existing wells (water, oil, gas, salt water injection, municipal waste, hazardous waste) in the carbon sequestration area? How many of these wells are unplugged in the FutureGen Project area?</li> <li>• How long would the well casings in the carbon sequestration area remain leak free?</li> <li>• How would one predict when CO<sub>2</sub> migration/movement would stop (threshold of immobility) in relation to property boundaries on the surface of the carbon sequestration area?</li> <li>• Who would require that models are continually updated using monitoring results and updated scientific information for carbon sequestration?</li> <li>• The EIS should address what would happen in the event of a pipeline leak or rupture.</li> </ul>

# **APPENDIX C FEDERAL AND STATE REGULATORY AND PERMITTING REQUIREMENTS**

This section identifies and summarizes statutes, regulations, Executive Orders, and permitting requirements potentially applicable to construction and operation of the proposed FutureGen Project.

## **C.1 FEDERAL ENVIRONMENTAL STATUTES AND REGULATIONS**

### **C.1.1 NATIONAL ENVIRONMENTAL POLICY ACT (NEPA)**

DOE prepared this EIS according to Council on Environmental Quality regulations (40 CFR Parts 1500 through 1508) which implement the procedural requirements of the National Environmental Policy Act (NEPA) of 1969, as amended (42 USC 4321 *et seq.*). NEPA requires agencies of the federal government to study the environmental impacts of major federal actions significantly affecting the quality of the human environment.

NEPA establishes an environmental policy for the nation, provides an interdisciplinary framework for environmental planning by federal agencies, and contains procedures to ensure that federal agency decision-makers take environmental factors into account. Under NEPA, Congress authorizes and directs federal agencies to carry out their regulations, policies, and programs as fully as possible in accordance with the statute's policies on environmental protection.

### **C.1.2 CLEAN AIR ACT (CAA)**

The Clean Air Act (CAA), as amended (42 USC 7401 *et seq.*) establishes National Ambient Air Quality Standards (NAAQS) set by EPA for certain pervasive pollutants: SO<sub>2</sub>, CO, O<sub>3</sub>, NO<sub>2</sub>, Pb, and PM (i.e., both PM<sub>10</sub> and PM<sub>2.5</sub>). NAAQS are expressed as concentrations of the criteria pollutants in the ambient air, which is the outdoor air to which the general public has access [40 CFR 50.1(e)]. Primary standards are set to protect the public health, including the health of sensitive populations such as asthmatics, children, and the elderly. Secondary standards are set to protect public welfare, including protection against decreased visibility plus damage to animals, crops, vegetation, and buildings. Table C.1-1 lists the NAAQS.

The CAA contains emission limiting programs and permit programs to protect the nation's air quality. Regulations implementing the CAA are found in 40 CFR Parts 50 through 95 and are summarized in Table C.1-2. The CAA also establishes New Source Performance Standards, 40 CFR Part 60, that establish requirements for new or modified sources such as design standards, equipment standards, work practices, or operational standards. The New Source Performance Standards are technology-based standards applicable to new and modified stationary sources of regulated air emissions. Where the NAAQS emphasize air quality in general, the New Source Performance Standards focus on particular sources of approximately 70 industrial source categories or sub-categories of sources (e.g., fossil fuel-fired generators, grain elevators, steam generating units) that are designated by size and type of process.

Under the CAA, a new major source is required to obtain a Prevention of Significant Deterioration (PSD) Construction Permit and a Title V Operating Permit. The States of Texas and Illinois have been delegated the authority to issue these permits to assure compliance with all CAA requirements.

**Table C.1-1. National Ambient Air Quality Standards**

Pollutant	Averaging Times	Primary Standards	Secondary Standards
SO <sub>x</sub>	Annual (Arithmetic Mean)	0.03 ppm	None
	24-hour <sup>1</sup>	0.14 ppm	None
	3-hour <sup>1</sup>	None	0.5 ppm (1300 µg/m <sup>3</sup> )
NO <sub>2</sub>	Annual (Arithmetic Mean)	0.053 ppm (100 µg/m <sup>3</sup> )	Same as Primary
PM <sub>10</sub>	Annual <sup>2</sup> (Arithmetic Mean)	Revoked	None
	24-hour <sup>3</sup>	150 µg/m <sup>3</sup>	None
PM <sub>2.5</sub>	Annual <sup>4</sup> (Arithmetic Mean)	15.0 µg/m <sup>3</sup>	Same as Primary
	24-hour <sup>5</sup>	35 µg/m <sup>3</sup>	None
CO	8-hour <sup>1</sup>	9 ppm (10 mg/m <sup>3</sup> )	None
	1-hour <sup>1</sup>	35 ppm (40 mg/m <sup>3</sup> )	None
O <sub>3</sub>	8-hour <sup>6</sup>	0.08 ppm (235 µg/m <sup>3</sup> )	Same as Primary
Pb	Quarterly Average	1.5 µg/m <sup>3</sup>	Same as Primary

<sup>1</sup> Not to be exceeded more than once per year.

<sup>2</sup> Due to a lack of evidence linking health problems to long-term exposure to coarse particle pollution, the agency revoked the annual PM<sub>10</sub> standard in 2006 (effective December 17, 2006).

<sup>3</sup> Not to be exceeded more than once per year on average over 3 years.

<sup>4</sup> To attain this standard, the 3-year average of the weighted annual mean PM<sub>2.5</sub> concentrations from single or multiple community-oriented monitors must not exceed 15.0 µg/m<sup>3</sup>.

<sup>5</sup> To attain this standard, the 3-year average of the 98th percentile of 24-hour concentrations at each population-oriented monitor within an area must not exceed 35 µg/m<sup>3</sup> (effective December 17, 2006).

<sup>6</sup> To attain this standard, the 3-year average of the fourth-highest daily maximum 8-hour average ozone concentrations measured at each monitor within an area over each year must not exceed 0.08 ppm.

Source: EPA, 2006

**Table C.1-2. Air Quality Regulations**

Regulation	Citation	Description
Prevention of Significant Deterioration (PSD)	40 CFR Part 52.21 35 IAC Part 201 <b>35 IAC Part 270</b> 30 TAC Chapter 116	<p>The PSD <b>program involves</b> a pre-construction review and permit process for construction and operation of a new or modified major stationary source in attainment areas. A major source is a source for which the amount of any one regulated pollutant emitted equal to or greater than thresholds of 100 tons per year (tpy) for sources which are part of the 28 categories defined by the PSD rule. The required PSD review consists of the following elements:</p> <ul style="list-style-type: none"> <li>• An ambient air quality impact analysis to demonstrate that the potential emissions from the proposed project will not cause or contribute to a violation of the applicable PSD increments and NAAQS.</li> <li>• An assessment of the direct and indirect effects of the proposed project on general growth, soil, vegetation, and visibility. Additionally, a source that might impact a Class I federal area must undergo additional review.</li> <li>• A case-by-case Best Available Control Technology (BACT) demonstration, which takes into account energy, environmental, and economic impacts as well as technical feasibility.</li> <li>• An ambient air quality monitoring program for up to one year may be required if no other representative data are available and if the project impacts are greater than a monitoring <i>de minimis</i> level.</li> <li>• Public comment, including an opportunity for a public hearing.</li> </ul> <p>The proposed Mattoon, Tuscola, Jewett, and Odessa Power Plant Sites and the sequestration sites would be subject to the PSD <b>federal and state</b> regulations. <b>Each source</b> would be defined as a major source because the proposed power plant would have the potential to emit more than 100 tons (91 metric tons) annually of more than one criteria pollutant. <b>Fossil-fuel-fired steam-electric generating plants are among the 28 PSD source categories subject to the 100 ton major source threshold.</b></p>

**Table C.1-2. Air Quality Regulations**

Regulation	Citation	Description
New Source Performance Standards (NSPS)	40 CFR Part 60 30 TAC Chapter 116	<p>The <b>Federal NSPS</b> are technology-based standards applicable to new and modified stationary sources of regulated air emissions. The NSPS program sets uniform emission limitations for approximately 70 industrial source categories or sub-categories of sources, <b>including</b> fossil fuel-fired steam generating units, that are designated by size as well as type of process. The standards that would potentially apply to the proposed Mattoon, Tuscola, Jewett, and Odessa Power Plant Sites are as follows:</p> <ul style="list-style-type: none"> <li>• Subpart A – General Provisions, which provides for general notification, record keeping, and monitoring requirements.</li> <li>• Subpart Da – Standards of Performance for Electric Utility Steam Generating Units For Which Construction is Commenced After September 18, 1978: applies to any electric utility combined cycle gas turbine that combusts more than 250 MMBtu/hour (73 MW) heat input of fossil fuel, <b>including synthetic gas derived from coal</b>, in the steam generator. As amended in <b>June 2007</b>, this provision is applicable to combined cycle units that burn <b>50 percent or more</b> (by heat input) <b>solid-derived fuel not meeting the definition of natural gas</b>. <b>Subpart Da includes emission limits for particulate matter, NO<sub>x</sub>, SO<sub>2</sub>, and mercury.</b></li> <li>• Subpart Db – Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units: covers the supplementary fired heat recovery steam generator (HRSG) and natural gas-fired auxiliary boiler because its heat input will be greater than 100 MMBtu/hr (29.2 MW). <b>Subpart Db includes emission limits for particulate matter, NO<sub>x</sub>, and SO<sub>2</sub>.</b></li> <li>• Subpart Y – Standards of Performance for Coal Preparation Plants: Coal handling capacity at the IGCC power station will exceed 200 tons (181 metric tons) per day, and is therefore subject to this NSPS.</li> </ul> <p><b>Further, the FutureGen Project would be subject to the mercury cap established for the respective State under the Clean Air Mercury Rule (May 18, 2005; 70 FR 28606). The unit would have to comply with the mercury requirements of the respective State in addition to meeting the mercury emission limits under Subpart Da.</b></p> <p>Additionally, the provisions of <b>these</b> subparts require the installation of a continuous emission monitoring system (CEMS) to monitor fuel consumption; <b>opacity; and emissions of NO<sub>x</sub>, SO<sub>2</sub>, and mercury</b>. A determination of the applicability will not be made until more detailed plant design parameters have been established.</p>
National Emissions Standards for Hazardous Air Pollutants (NESHAP)	40 CFR Parts 61 and 63 35 IAC Part 201 <b>35 IAC Part 232</b> 30 TAC Chapter 116	<p>Non-criteria pollutants that can cause serious health and environmental hazards are termed hazardous air pollutants (HAP) or air toxics. <b>The NESHAP apply to new and existing sources in source categories defined to be major (i.e., emitting a single HAP in excess of 10 tons [9.1 metric tons] per year or an aggregate emission rate of over 25 tons [22.7 metric tons] per year of any combination of regulated HAP). The combustion turbine portion of the FutureGen Project would be required to comply with 40 CFR 63, Subpart YYYYY.</b></p>

**Table C.1-2. Air Quality Regulations**

Regulation	Citation	Description
Clean Air Interstate Rule (CAIR)	Section 110 of the CAA Amendments 35 IAC Part 225 30 TAC Chapter 101, Subchapter H, Division 7. 30 TAC Chapter 122.	On <b>May 12, 2005, (70 FR 25162)</b> EPA issued CAIR, a rule that will permanently cap emissions of SO <sub>2</sub> and NO <sub>x</sub> from electric generating units (EGU) in the eastern United States so as to address PM <sub>2.5</sub> and ground-level O <sub>3</sub> transport. CAIR <b>builds on the Acid Rain Program (discussed below) and</b> would achieve large reductions of SO <sub>2</sub> and NO <sub>x</sub> emissions across 28 States (including Illinois and Texas) and the District of Columbia. <b>CAIR creates a market-based cap-and-trade program that reduces nationwide SO<sub>2</sub> and NO<sub>x</sub> emissions in two distinct phases</b>  <b>The States of Illinois and Texas are working to develop their plans to implement CAIR.</b>  <b>CAIR remains in effect, although it is under litigation.</b>
Clean Air Mercury Rule (CAMR)	Section 111 of the CAA Amendments 35 IAC Part 225 30 TAC Chapter 101, Subchapter H, Division 8. 30 TAC Chapter 122	On <b>May 18, 2005, (70 FR 28606)</b> EPA issued CAMR, which <b>establishes “standards of performance” limiting mercury emissions from new and existing coal-fired power plants and creates a market-based cap-and-trade program that reduces nationwide utility emissions of mercury in two distinct phases. As noted above, new coal-fired power plants will have to meet NSPS</b> in addition to being subject to the caps.  <b>The States of Illinois and Texas are working to develop their plans to implement CAMR.</b>  CAMR remains in effect, <b>although it is under litigation.</b>  CAMR <b>builds on, and</b> is a closely related action to, CAIR, which is discussed above.

**Table C.1-2. Air Quality Regulations**

Regulation	Citation	Description
Acid Rain Program	40 CFR Parts 72 through 78	<p>EPA established a program to control emissions <b>of SO<sub>2</sub> and NO<sub>x</sub></b> that contribute to the formation of acid rain. The acid rain regulations are applicable to “affected units” as defined in the regulations. The objectives of the program are achieved through a system of marketable <b>SO<sub>2</sub></b> allowances, which are used by utility units to cover their SO<sub>2</sub> emissions, <b>and through imposing an emission limitation on a unit’s NO<sub>x</sub> emissions</b>. One allowance means that an affected utility unit may emit up to 1 ton of SO<sub>2</sub> during a given year. <b>Affected sources</b> cannot emit more tons of SO<sub>2</sub> than they hold in allowances. Allowances may be bought, sold, or traded, and any allowances that are not used in a given year may be banked and used in the future. Owners or operators of an affected unit are subject to the following Acid Rain Program requirements:</p> <ul style="list-style-type: none"> <li>• Acid Rain Permit Application, which must be submitted at least 24 months prior to the date of initial operation of the unit.</li> <li>• SO<sub>2</sub> emission allowances, which are to be secured on an annual basis.</li> <li>• NO<sub>x</sub> emission <b>rate</b> limitations.</li> <li>• Continuous emissions monitoring requirements, <b>and other monitoring, reporting, and recordkeeping requirements</b>, for NO<sub>x</sub>, SO<sub>2</sub>, opacity, <b>and carbon dioxide</b>.</li> </ul> <p>The proposed FutureGen Project would be subject to the Acid Rain Program requirements because it meets the definition of an affected unit under 40 CFR 72.6(3)(i).</p>
Compliance Assurance Monitoring (CAM) Rule	40 CFR Part 64 35 IAC Part 201 30 TAC Chapter 122	<p>The CAM Rule applies to facilities that have emission units located at major sources subject to Title V air quality permitting and that use control devices to achieve compliance with emission limits. It requires that these facilities monitor the operation and maintenance of their control equipment to evaluate the performance of their control devices and report if they meet established emission standards. If these facilities find that their control equipment is not working properly, the CAM rule requires them to take action to correct any malfunctions and to report such instances to the appropriate enforcement agency (i.e., State and local environmental agencies).</p> <p><b>Six exemptions also apply. The CAM Rule does not apply to emission limitations and standards that: (1) are contained in post 1990 rules, (2) specify a continuous compliance determination method, (3) are related to stratospheric ozone requirements, (4) are included in the Acid Rain program, (5) apply solely under an emissions trading program, or (6) are included in an emissions cap that meets the requirements of 40 CFR 70.4(b)(13).</b></p> <p>The FutureGen Project would be a major source that would require an operating permit and would need to demonstrate compliance with the CAM Rule.</p>

**Table C.1-2. Air Quality Regulations**

Regulation	Citation	Description
Regional Haze Rule	40 CFR Part 55, §§ 51.300 through 51.309  30 TAC Chapter 101, Subchapter H, Division 7. 30 TAC Chapter 122.  Proposed TX BART Rules	<p>In July 1999, EPA published the Regional Haze Rule to address visibility impairment in our nation’s largest national parks and wilderness (“Class I”) areas. By December 2007, states must submit to U.S. EPA a Regional Haze State Implementation Plan (SIP) that identifies sources that cause or contribute to visibility impairment in these areas. The Regional Haze SIP must also include a demonstration of reasonable progress toward reaching the 2018 visibility goal for each of the state’s Class I areas. The Regional Haze Rule singles out certain older emission sources that have not been regulated under other provisions of the CAA. Those older sources that could contribute to visibility impairment in Class I areas may be required to install emissions controls.</p> <p>The regional haze rule requires each state’s SIP to require emission controls known as best available retrofit technology (BART), for certain industrial facilities emitting air pollutants that reduce visibility by causing or contributing to regional haze.</p> <p>Because both the proposed Mattoon and Tuscola power plants would be new facilities, they would not have to meet the BART requirement. However, under the PSD requirements, a new source of criteria and air toxics emissions has to be analyzed to determine its impacts on Class I area visibility. The proposed plant sites would be located more than 186 miles (300 km) from the nearest Class I area subject to the regional haze rule. Therefore, both sites would not be required to conduct a Class I area impact analysis under the Regional Haze Rule.</p> <p>Currently, the TCEQ is developing State versions of the BART rule to comply with Federal Clean Air Act requirements.</p> <p>Because both the proposed Jewett and Odessa power plants would be a new facility, they would not have to meet the BART requirement. However, under the PSD requirements, a new source of criteria and air toxics emissions has to be analyzed to determine its impacts on Class I area visibility. The proposed plant sites would be located more than 186 miles (300 km) from the nearest Class I area subject to the regional haze rule. Therefore, both sites would not be required to conduct a Class I area impact analysis under the Regional Haze Rule.</p>

**Table C.1-2. Air Quality Regulations**

Regulation	Citation	Description
Chemical Accident Provisions	40 CFR Part 68 and Section 112(r) of the CAA Amendments  35 IAC Part 201  30 TAC Chapter 122	<p>This regulation applies to stationary sources having more than a threshold quantity of the specific regulated toxic and flammable chemicals. It is intended to prevent accidental releases to the air and to mitigate the consequences of any such releases by focusing prevention measures on chemicals that pose the greatest risk to the public and the environment.</p> <p>Stationary sources covered by this regulation must develop and implement a risk management program that includes a hazard assessment, a prevention program, and an emergency response program. These elements are to be described in a risk management plan that must be submitted to EPA as well as state and local emergency planning authorities. The plan must also be made available to the public by the date that a regulated substance is first present in a process above a threshold quantity.</p> <p>Under the Illinois Accidental Release Prevention Program, the FutureGen Project, if sited in Illinois, would be required to comply with the Chemical Accident Provisions if there were a potential to emit hydrogen sulfide above the accidental release threshold quantities. Because the Alliance has indicated that a 19 percent aqueous ammonia solution would be used (which is below the 20 percent applicability threshold), the ammonia stored on site would not be subject to the accidental release provisions.</p> <p>Under the Texas Accidental Release Prevention Program, the FutureGen Project, if sited in Texas, would be required to comply with the Chemical Accident Provisions if there were a potential to store either hydrogen sulfide or ammonia above the accidental release threshold quantities. Because the Alliance has indicated that a 19% aqueous ammonia solution would be used, which is below the 20% applicability threshold, the ammonia stored on site would not be subject to the accidental release provisions.</p>
General Conformity Rule	40 CFR, Parts 6, 51 and 93  30 TAC Chapter 101.30  <b>35 IAC Part 255</b>	<p>An area that does not meet (or contributes to ambient air quality in a nearby area that does not meet) the primary or secondary NAAQS for a pollutant is referred to as a nonattainment area. The CAA requires states to submit to the EPA a State Implementation Plan (SIP) for attainment of the NAAQS in nonattainment areas. The 1977 and 1990 amendments to the CAA require comprehensive <b>SIP</b> revisions for areas where one or more of the <b>NAAQS</b> have yet to be attained.</p> <p>The 1990 Amendments to the CAA required <b>Federal</b> actions to show conformance with the SIP. Federal actions <b>include, but are not limited to</b>, those projects that are funded by <b>Federal</b> agencies and the review and approval of a proposed action through <b>a Federal agency's</b> NEPA process. Conformance with the SIP means <b>that the Federal action will not interfere with</b> the approved SIP's purposes of eliminating or reducing the severity and number of violations of the NAAQS and achieving expeditious attainment of such standards. The need to demonstrate conformity is applicable only to <b>Federal actions that occur in</b> areas that are not in compliance with the NAAQS or areas that were previously in nonattainment for one or more pollutants and are currently designated as maintenance areas.</p> <p>The proposed FutureGen Project is a federal action under the jurisdiction of the General Conformity Rule. However, all four proposed plant sites and sequestration sites are located <b>in</b> regions that are in attainment for all criteria pollutants. Therefore, <b>the General Conformity Rule is not applicable to the proposed FutureGen Project.</b></p>

### **C.1.3 CLEAN WATER ACT (CWA)**

The Clean Water Act (CWA) of 1977, as amended (33 USC 1251 *et seq.*) focuses on improving the quality of water resources by providing a comprehensive framework of standards, technical tools, and financial assistance to address the many causes of pollution and poor water quality, including municipal and industrial wastewater discharges and polluted runoff from urban and rural areas. Under provisions of the CWA, an applicant for a federal license or permit to conduct any activity that may result in a discharge to navigable waters must provide the federal agency with a Section 401 certification. The certification, made by the state in which the discharge originates, declares that the discharge will comply with applicable provisions of the CWA, including water quality standards. Section 404 of the CWA establishes a program to regulate the discharge of dredged and fill material into waters of the United States, including wetlands. Activities in waters of the United States that are regulated under this program include fills for development, water resource projects, infrastructure development, and conversion of wetlands to uplands for farming and forestry. A federal permit is required to discharge dredged or fill material into wetlands and other waters.

### **C.1.4 RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)**

The Resource Conservation and Recovery Act (RCRA), as amended (42 USC 6901 *et seq.*) regulates the treatment, storage, and disposal of hazardous wastes. The plant is expected to generate small volumes of hazardous maintenance-related waste, and would be a conditionally exempt small quantity generator under federal and state hazardous waste regulations. The proposed power plant would obtain a generator identification number and would temporarily store small volumes of wastes onsite in secure containers prior to transport offsite to an authorized treatment, storage, recycling, or disposal facility.

### **C.1.5 NATIONAL HISTORIC PRESERVATION ACT (NHPA)**

The National Historic Preservation Act of 1966 (NHPA), as amended (16 USC 470 *et seq.*) and its implementing regulations, 36 CFR 800, requires DOE to consult with the State Historic Preservation officer (SHPO) prior to construction to ensure that no historical properties would be affected by the proposed project. DOE must also afford the Advisory Council on Historic Preservation a reasonable opportunity to comment on the proposed project.

### **C.1.6 ARCHAEOLOGICAL RESOURCES PROTECTION ACT**

The Archaeological Resources Protection Act, as amended (16 USC 470aa *et seq.*) requires a permit for excavation or removal of archaeological resources from publicly held or Native American lands. The Act requires that excavations further archaeological knowledge in the public interest, and that the resources removed remain the property of the United States.

### **C.1.7 AMERICAN INDIAN RELIGIOUS FREEDOM ACT**

The American Indian Religious Freedom Act of 1978 (42 USC 1996) reaffirms Native American religious freedom under the First Amendment of the U.S. Constitution, and establishes policy to protect and preserve the inherent and Constitutional right of Native Americans to believe, express, and exercise their traditional religions. This law ensures the protection of sacred locations and access of Native Americans to those sacred locations and traditional resources that are integral to the practice of their religions. It also establishes requirements that would apply to Native American sacred locations, traditional resources, or traditional religious practices potentially affected by construction and operation of the proposed facilities.

### **C.1.8 NATIVE AMERICAN GRAVES PROTECTION AND REPATRIATION ACT**

The Native American Graves Protection and Repatriation Act of 1990 (25 USC 3001) directs the Secretary of the Interior to guide the repatriation of Federal archaeological collections and collections that are culturally affiliated with Native American tribes and held by museums that receive Federal funding. Actions required by this law include establishing a review committee with monitoring and policy-making responsibilities, developing regulations for repatriation including procedures for identifying lineal descent or cultural affiliation needed for claims, overseeing museum programs designed to meet the inventory requirements and deadlines of this law, and developing procedures for handling unexpected discoveries of graves or grave artifacts during activities on Federal or tribal land. DOE would follow the provisions of this Act if any excavations associated with the proposed construction led to unexpected discoveries of Native American graves or grave artifacts.

### **C.1.9 ENDANGERED SPECIES ACT**

The Endangered Species Act of 1973 (ESA), as amended (16 USC 1531 *et seq.*) establishes a national program for the conservation of threatened and endangered species of fish, wildlife, and plants; and the preservation of the ecosystems on which they depend. Section 7, "Interagency Cooperation," requires any federal agency authorizing, funding, or carrying out any action to ensure that the action is not likely to jeopardize the continued existence of any endangered species or threatened species, or result in the destruction or adverse modification of critical habitat of such species. Regulations implementing the applicable interagency consultation process of the Endangered Species Act are codified at 50 CFR Part 402.

### **C.1.10 FISH AND WILDLIFE CONSERVATION ACT**

The Fish and Wildlife Conservation Act of 1980 (16 USC 2901 *et seq.*) encourages federal agencies to conserve and promote conservation of non-game fish and wildlife species and their habitats. In addition, the Fish and Wildlife Coordination Act (16 USC 661 *et seq.*) requires federal agencies undertaking projects affecting water resources to consult with the U.S. Fish and Wildlife Service (FWS) and the state agency responsible for fish and wildlife resources. These agencies are to be sent copies of this EIS and their comments will be considered.

### **C.1.11 NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)**

The National Pollutant Discharge Elimination System (33 USC 1342 *et seq.*), authorized under the CWA, requires sources to obtain permits to discharge effluents and stormwaters to surface waters. Regulations implementing the NPDES program are found in 40 CFR 122. Under this program, permit modifications are required if discharge effluents are altered. The CWA authorizes EPA to delegate permitting, administrative and enforcement duties to state governments, while EPA retains oversight responsibilities. The States of Texas and Illinois have been delegated NPDES authority and therefore would issue the NPDES permit. The proposed project involves discharge to surface waters and would be subject to NPDES requirements.

### **C.1.12 NOISE CONTROL ACT**

Section 4 of the Noise Control Act of 1972, as amended (42 USC 4901 *et seq.*) directs Federal agencies to carry out programs in their jurisdictions "to the fullest extent within their authority" and in a manner that furthers a national policy of promoting an environment free from noise that jeopardizes health and welfare.

### **C.1.13 FARMLAND PROTECTION POLICY ACT**

The Farmland Protection Policy Act (7 USC 4201 *et seq.*) directs federal agencies to identify and quantify adverse impacts of federal programs on farmlands. The Act's purpose is to minimize the number of federal programs that contribute to the unnecessary and irreversible conversion of agricultural land to non-agricultural uses.

### **C.1.14 EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW ACT**

Under Subtitle A of the Emergency Planning and Community Right-to-Know Act of 1986 (42 USC 1001 *et seq.*), which is also known as Superfund Amendments and Reauthorization Act, Title III; and Executive Order 13148, "Greening the Government through Leadership in Environmental Management," Federal agencies must provide information on hazardous and toxic chemicals to state emergency response commissions, local emergency planning committees, and the U.S. Environmental Protection Agency. The goal of providing this information about inventories of specific chemicals used or stored, and descriptions of releases that could occur at work sites is to ensure that emergency plans are sufficient to respond to unplanned releases of hazardous substances. This act, implemented at 40 CFR Parts 302 through 372, requires agencies to provide reports on material safety data sheets, emergency and hazardous chemical inventory, and toxic chemical releases to appropriate local, state, and federal agencies. These regulations also require facilities that store, dispense, use, or handle extremely hazardous materials in excess of specified thresholds to report quantity data to specific agencies and organizations. The plant would manufacture, process, or otherwise use a number of substances subject to the Act's reporting requirements, such as some trace amounts of metals and mercury.

### **C.1.15 OCCUPATIONAL SAFETY AND HEALTH ACT**

Compliance with the Occupational Safety and Health Act of 1970, as amended (29 USC 651 *et seq.*) would be required. Specifically, the construction and general industry rules in 29 CFR Parts 1910 and 1926 apply. Plant employees would be instructed in worker protection and safety procedures, and would be provided appropriate personal protective equipment pursuant to the plant's safety program.

### **C.1.16 SAFE DRINKING WATER ACT**

The Safe Drinking Water Act (42 USC 300 *et seq.*) gives the U.S. Environmental Protection Agency the responsibility and authority to regulate public drinking water supplies by establishing drinking water standards, delegating authority for enforcement of drinking water standards to the states, and protecting aquifers from hazards such as injection of wastes and other materials into wells. The State agencies responsible for enforcement are the Illinois Environmental Protection Agency and the Texas Commission on Environmental Quality. Drinking water regulations for this program are codified at 40 CFR 141, Title 35 of the Illinois Administrative Code, and 30 TAC Chapter 290.

### **C.1.17 POLLUTION PREVENTION ACT**

The Pollution Prevention Act of 1990 (42 USC 13101 *et seq.*) establishes a national policy for waste management and pollution control that focuses first on source reduction, and then on environmentally safe waste recycling, treatment, and disposal. Two executive orders provide guidance to agencies to implement the Pollution Prevention Act. Executive Order 13101, "Greening the Government through Waste Prevention, Recycling, and Federal Acquisition," directs Federal agencies to incorporate waste prevention and recycling in each agency's daily operations and work to increase and expand markets for recovered materials through preference and demand for environmentally preferable products and services. Executive Order 13148, "Greening the Government through Leadership in Environmental Management,"

makes the head of each Federal agency responsible for ensuring that all necessary actions are taken to integrate environmental accountability into agency day-to-day decision-making and long-term planning across all agency missions, activities, and functions.

DOE requires specific goals to reduce the generation of waste. DOE would implement a pollution prevention plan by incorporating such waste-reducing activities as ordering construction materials in correct sizes and number, resulting in very small amounts of waste; and implementing best management practices to reduce the volume of waste generated and reuse waste wherever possible.

### **C.1.18 NOTICE TO THE FEDERAL AVIATION ADMINISTRATION**

The Federal Aviation Administration must be notified if any structures more than 200 feet high would be constructed at the proposed site pursuant to 14 CFR Part 77. The FAA would then determine if the structures would or would not be an obstruction to air navigation. It is anticipated that the proposed power plant would include a 250-foot stack.

## **C.2 EXECUTIVE ORDERS**

Executive Order 11514, "Protection and Enhancement of Environmental Quality," directs federal agencies to continuously monitor and control activities to protect and enhance the quality of the environment. The Order also requires agencies to develop procedures to ensure the fullest practical provision of timely public information and the understanding of Federal plans and programs with potential environmental impacts, and to obtain the views of interested parties. DOE promulgated regulations (10 CFR Part 1021) and issued DOE Order 451.1B, *National Environmental Policy Act Compliance Program*, to ensure compliance with this Executive Order. Because the Proposed Action is a Federal action that requires NEPA analysis, DOE must comply with Order 451.1B.

Executive Order 11988, "Floodplain Management," directs federal agencies to establish procedures to ensure that they consider potential effects of flood hazards and floodplain management for any action undertaken. Agencies are to avoid impacts to floodplains to the extent practical. Executive Order 11990, "Protection of Wetlands," requires federal agencies to avoid short and long term impacts to wetlands if a practical alternative exists. Compliance with Floodplain and Wetland Environmental Review Requirements at 10 CFR Part 1022 establishes DOE procedures for compliance with these two Executive Orders.

For a proposed floodplain or wetland action, DOE shall prepare a floodplain or wetland assessment. If DOE finds that no practicable alternative to locating or conducting the action in the floodplain or wetland is available, then before taking the action DOE shall design or modify its action in order to minimize potential harm to or within the floodplain or wetland, consistent with the policies set forth in Executive Order 11988 and Executive Order 11990. DOE is also required to provide opportunity for public review after issuance of a notice of a proposed floodplain action or a notice of proposed wetland action.

Executive Order 12856, "Right to Know Laws and Pollution Prevention Requirements," directs federal agencies to establish programs to provide the public with important information on the hazardous and toxic chemicals in their communities, and establish emergency planning and notification requirements to protect the public in the event of a release of extremely hazardous substances.

Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," directs federal agencies to identify disproportionately high and adverse

human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.

Executive Order 13112, “Invasive Species,” directs federal agencies to prevent the introduction of or to monitor and control invasive (non-native) species, to provide for restoration of native species, to conduct research, to promote educational activities, and to exercise care in taking actions that could promote the introduction or spread of invasive species.

Executive Order 13186, “Responsibilities of Federal Agencies to Protect Migratory Birds,” requires federal agencies to avoid or minimize the negative impacts of their action on migratory birds, and to take active steps to protect birds and their habitats. For actions having or likely to have a negative impact on migratory bird populations, work with the FWS to develop an agreement to conserve migratory birds. Federal agencies must avoid or minimize impacts to migratory bird populations, take reasonable steps that include restoring and enhancing habitat, prevent or abate pollution affecting birds, and incorporate migratory bird conservation into agency planning processes whenever possible. The Executive Order also requires environmental analyses of federal actions to evaluate effects of those actions on migratory birds, to control the spread and establishment in the wild of exotic animals and plants that could harm migratory birds and their habitats, and either to provide advance notice of actions that could result in the take of migratory birds or to report annually to the FWS on the numbers of each species taken during the conduct of agency actions.

Executive Order 13423, “Strengthening Federal Environmental, Energy, and Transportation Management,” directs Federal agencies to “...conduct their environmental, transportation, and energy-related activities...in an environmentally, economically and fiscally sound, integrated, continuously improving, efficient, and sustainable manner.”

## **C.3 STATE ENVIRONMENTAL STATUTES AND REGULATIONS**

### **C.3.1 ILLINOIS REGULATORY REQUIREMENTS**

#### **C.3.1.1 State Endangered Species and Natural Areas Review**

State agencies and local governments which authorize, fund or perform actions altering environmental conditions must consult with the Illinois Department of Natural Resources pursuant to 520 ILCS 10 and 525 ILCS 30, in order to avoid or minimize adverse impacts.

#### **C.3.1.2 Farmland Conversion Impact**

Because both the Mattoon and Tuscola, IL proposed sites are on agricultural land, DOE would be required to follow the procedures in the Farmland Conversion Impact, 7 CFR 658, to (a) identify and take into account the adverse effects of its program on the preservation of farmland; (b) consider alternative actions, as appropriate, that could lessen adverse effects; and (c) ensure that its program, to the extent practicable, is compatible with State and units of local government, as well as private programs and policies to protect farmland.

#### **C.3.1.3 State Wetland Review**

A state wetland review conducted by the Illinois Department of Natural Resources pursuant to 20 ILCS 830 would be required if it is determined that wetlands are present on either the proposed site or on transmission or pipeline corridors.

### **C.3.1.4 Consultation under the National Historic Preservation Act**

The National Historic Preservation Act, 16 USC 470 *et seq.*, would require DOE to consult with the Illinois Historic Preservation Agency in order to fulfill the requirements under Section 106 of the Act.

### **C.3.1.5 Notice to the Illinois Department of Transportation, Aeronautics Division**

The Illinois Department of Transportation, Aeronautics Division must be notified if any structures more than 200 feet high would be constructed at the proposed site pursuant to 92 IAC Part 16. It is anticipated that the proposed power plant would include a 250-foot stack.

## **C.3.2 TEXAS REGULATORY REQUIREMENTS**

### **C.3.2.1 State Endangered Species**

Endangered Species are regulated under Chapter 68 of the Texas Parks and Wildlife Code and 31 TAC Chapter 65, Subchapter G. Texas Parks and Wildlife Department regulations prohibit the taking, possession, transportation, or sale of any of the animal species designated by state law as endangered or threatened without the issuance of a permit. State laws and regulations prohibit commerce in threatened and endangered plants, and the collection of listed plant species from public land without a permit issued by the Texas Parks and Wildlife Department. Although it is unlikely that construction and operations of the proposed facilities would disturb an endangered species, DOE would comply with all applicable requirements.

### **C.3.2.2 Consultation under the National Historic Preservation Act**

The National Historic Preservation Act, 16 USC 470 *et seq.*, would require DOE to consult with the Texas Historical Commission in order to fulfill the requirements under Section 106 of the Act.

### **C.3.2.3 Solid Waste Management, On-Site Disposal of Nonhazardous Industrial Solid Waste**

The Texas Commission on Environmental Quality would regulate any solid, non-product waste generated. The regulations would include proper waste classification, notification and reporting under 30 TAC Ch. 335. Any hazardous waste generated and disposed or treated on site would be subject to permitting. Texas does not require a permit for nonhazardous industrial solid waste that is disposed of within the site boundaries of the industrial plant generating the waste unless the disposal site is greater than 50 miles (80 kilometers) from the point of generation.

### **C.3.2.4 Registration with the Public Utility Commission of Texas**

Power generation plants operating within the State of Texas must register with the Public Utility Commission of Texas pursuant to Public Utility Commission Substantive Rule Section 25.109.

### **C.3.2.5 Surface Casing Letters**

The Texas Water Code Sections 27.015 and 27.033 requires a letter from the Texas Railroad Commission addressed to the Texas Commission on Environmental Quality concluding that drilling or using the underground injection control, disposal well and injection of industrial wastes will not endanger or injure any known oil or gas reservoir. Likewise, the regulation requires a letter from the Texas

Commission on Environmental Quality addressed to the Texas Railroad Commission concluding that drilling and injecting oil and gas waste into the subsurface stratum will not endanger the freshwater strata in the area, and that the formation or stratum to be used for the disposal is not freshwater sand.

## C.4 FEDERAL AND STATE PERMITTING

Table C.1-3 lists all potentially applicable federal and state permitting requirements to construct and operate the proposed facilities.

**Table C.1-3. Permit or Approval Requirements to Construct and Operate the Proposed Facilities**

Permit or Approval	Description
<b>Federal</b>	
<b>Acid Rain Permit</b> 40 CFR Part 72	Required for utility units exceeding threshold limits specified in the regulation cited. This permit is a part of the larger Title V permit, issued pursuant to the Clean Air Act.
<b>Airspace Obstruction Control Permit</b> 14 CFR Part 77	An Airspace Obstruction Control Permit would be required if the proposed facilities were built in Tuscola, IL. The Tuscola airport is located less than 1 mile (1.6 kilometers) from the northern border of the proposed plant site. The Illinois Department of Transportation, Aeronautics Division has been granted the authority to issue the permit.
<b>Clean Air Act, Title I, IV, and V</b> 40 CFR Parts 50 – 96	<p>Establishes NAAQS set by the EPA for certain pervasive pollutants.</p> <p>Applicable Titles:</p> <p>Title I—Air Pollution Prevention and Control.</p> <p>A Prevention of Significant Deterioration permit would be required if the plant would have the potential to emit 100 tons per year or more of a pollutant subject to regulation under the Clean Air Act. Regulated air pollutants include SO<sub>2</sub>, NO<sub>x</sub>, and CO.</p> <p>Title IV—Acid Deposition Control.</p> <p>An Acid Deposition Control permit would be required. This title establishes limitations on SO<sub>2</sub> and NO<sub>x</sub> emissions. This Title requires that emissions of SO<sub>2</sub> from utility sources be limited to the amounts of allowances held by the sources.</p> <p>Title V—Permitting.</p> <p>An Operating Permit is required if the plant falls within 40 CFR 70.3 designations. This Title provides the basis for the Operating Permit Program and establishes permit conditions, including monitoring and analysis, inspections, certification, and reporting. A Title V permit would also cover any requirements established under the Clean Air Interstate Rule or the Clean Air Mercury Rule. Authority for implementation of the permitting program has been delegated to the states of Illinois and Texas.</p>

**Table C.1-3. Permit or Approval Requirements to Construct and Operate the Proposed Facilities**

Permit or Approval	Description
<p><b>Clean Water Act, Title IV</b> 40 CFR Parts 104 – 140</p>	<p>Focuses on improving the quality of water resources by providing a comprehensive framework of standards, technical tools, and financial assistance to address the many causes of pollution and poor water quality, including municipal and industrial wastewater discharges, polluted runoff from urban and rural areas, and habitat destruction.</p> <p>Applicable Sections:</p> <p>Section 401—Certification.</p> <p>Provides states with the opportunity to review and approve, condition, or deny all Federal permits or licenses that might result in a discharge to state or tribal waters, including wetlands. The major Federal permit subject to Section 401 review is a Section 404 permit. Every applicant for a Section 404 permit must request state certification that the proposed activity will not violate state or Federal water quality standards.</p> <p>Section 402—NPDES Permit.</p> <p>Requires sources to obtain permits to discharge effluents and stormwaters to surface waters. A pollution prevention plan is required. The CWA authorizes EPA to delegate permitting, administrative, and enforcement duties to state governments, while EPA retains oversight responsibilities. Illinois and Texas have been delegated NPDES authority and therefore would issue the NPDES permit.</p> <p>Section 404—Permits for Dredged or Fill Material.</p> <p>Regulates the discharge of dredged or fill material in the jurisdictional wetlands and waters of the United States. The USACE has been delegated the responsibility for authorizing these actions.</p>
<p><b>Notice to the Federal Aviation Administration</b> 14 CFR Part 77</p>	<p>The FAA must be notified if any structures more than 200 ft. high would be constructed at the proposed site pursuant to 14 CFR Part 77. The FAA would then determine if the structures would or would not be an obstruction to air navigation.</p>
<p><b>Pretreatment Authorization for Discharge of Wastewater to Municipal Collection System</b> 40 CFR Part 403</p>	<p>A permit is required if wastewater is to be discharged to a municipal water treatment facility.</p>
<p><b>Resource Conservation and Recovery Act (RCRA) of 1976</b> 40 CFR Parts 239 through 299</p>	<p>Regulates the treatment, storage, and disposal of hazardous wastes. Project participants would be required to identify any residues that require management as hazardous waste under RCRA (40 CFR Part 261). For some waste streams, this includes testing waste samples using the toxic characteristic leaching procedure or other procedures that measure hazardous waste characteristics.</p> <p>Applicable Title:</p> <p>Title II—Solid Waste Disposal (known as the Solid Waste Disposal Act), regulates the disposal of solid wastes. Title II, Subtitle C—Hazardous Waste Management, provides for a regulatory system to ensure the environmentally sound management of hazardous wastes from the point of origin to the point of final disposal. Title II, Subtitle D—State or Regional Solid Waste Plans.</p> <p>Illinois and Texas have been delegated the authority to issue RCRA permits.</p>

**Table C.1-3. Permit or Approval Requirements to Construct and Operate the Proposed Facilities**

<b>Permit or Approval</b>	<b>Description</b>
<b>Rivers and Harbor Act Permit</b> 33 CFR Part 322	Permit for structures or work in or affecting navigable waters of the United States.
<b>Sales Tap Approval</b> 18 CFR 157.211	Approval would be required to tap into or modify existing interstate gas pipelines.
<b>Underground Injection Control Permit</b> 40 CFR Part 144	The Safe Drinking Water Act was established to protect all underground sources of drinking water. A sequestration well would require a permit issued according to 40 CFR Part 144 requirements. The states of Texas and Illinois have been granted the authority to issue these permits.
<b>Illinois State Permitting</b>	
<b>Accommodation of Utilities on Right-of-Way</b> 92 IAC Part 530	A public entity acting in the capacity of a utility must obtain a permit issued by an officer of the elected governing body.
<b>Air Construction Permit</b> 35 IAC Parts 201 and 203	Applicable if a Title I Prevention of Significant Deterioration permit under the federal CAA is not required.
<b>Air Operating Permit</b> 35 IAC Part 201, 203 and 205	Applicable to minor sources if a Title V operating permit under the federal CAA is not required.
<b>Certificate of Public Convenience and Necessity</b> Section 3-105 and 8-406 of the Illinois Public Utilities Act	A certificate would be required if the plant is determined to be a public utility.
<b>Interconnection Agreement</b>	If an interconnection agreement is required with an owner of a transmission system, approval by the Illinois Commerce Commission may be required.
<b>Hydrostatic Test Water Discharge Permit</b>	<b>NPDES Temporary Discharge Permit (General Forms 1 and 2E and Form ILG67)</b>
<b>NPDES Permit</b> 35 IAC Part 309	Requires sources to obtain permits to discharge effluents and stormwaters to surface waters.
<b>NPDES General Construction Stormwater Permit</b> 35 IAC, Subtitle C, Chapter 1	Requires sources to submit a notice of intent for coverage under Permit No. ILR10, applicable to stormwater discharge from construction sites disturbing 1 acre or more of land.
<b>NPDES General Industrial Stormwater Permit</b> 35 IAC Subtitle C, Chapter 1	Requires sources to submit a notice of intent for coverage under Permit No. ILR00, applicable to stormwater discharges associated with industrial activity.
<b>Permit for Groundwater Monitoring Wells</b> 77 IAC 920	The Illinois Department of Public Health, Environmental Health Division and local health departments review water well installation plans, issue permits for new well construction, and inspect wells.
<b>Permit for Nonhazardous Onsite Waste Disposal Facility</b> 35 IAC Parts 812 and 813	The Illinois Environmental Protection Agency (IEPA) could require a permit under 35 IAC Parts 812 and 813 if it determines that the disposal facility is environmentally significant. If the IEPA decides that a permit is not necessary, the operator would be subject to the reporting requirements of 35 IAC Part 815.

**Table C.1-3. Permit or Approval Requirements to Construct and Operate the Proposed Facilities**

<b>Permit or Approval</b>	<b>Description</b>
<b>Potable Water Supply Connection Permits</b> ILCS, Chapter 415	A permit would be required to connect to a public potable water supply.
<b>Prevention of Significant Deterioration (PSD) Permit</b> 40 CFR 52.21	Required if the plant would have the potential to emit 100 tons per year or more of a pollutant subject to regulation under the CAA. Regulated pollutants include SO <sub>2</sub> , NO <sub>x</sub> , and CO. A PSD Permit would be issued by the state or local air pollution control agency.
<b>RCRA Permit Program</b> 35 IAC 702 and 703	A RCRA permit would be required for treatment and storage of hazardous waste if the waste quantities and storage durations exceed applicable thresholds. It is anticipated that hazardous waste management would occur under generator accumulation standards, subject to notification and reporting requirements but exempt from permitting.
<b>Underground Injection Control Permit</b> 35 IAC Parts 704 and 730	A CO <sub>2</sub> injection well could be either a Class I or Class V well. Expected upcoming guidance from the Environmental Protection Agency will affect this determination.
<b>Wastewater Facility Construction Approval</b> ILCS, Chapter 415	Construction of wastewater treatment equipment would require an approval from the Illinois Environmental Protection Agency.
<b>City of Tuscola and Douglas County, IL Permitting (Tuscola Site)</b>	
<b>Construction and Building Permits</b> Tuscola Code of Ordinances, Chapters 150 through 153	Permits would be required for new building construction, any new installation or alteration of electrical equipment, any new heating unit, and any new plumbing.
<b>Permit required for any connection to a public sewer</b> Tuscola Code of Ordinances, Chapter 51	A permit would be needed to connect to the City of Tuscola sewer system.
<b>City of Mattoon and Coles County, IL Permitting (Mattoon Site)</b>	
<b>Construction and Building Permits</b> Mattoon Code of Ordinances Chapters 150, 151, 152 and 156	Building permits would be required. The City of Mattoon has adopted the International Building Code, the International Fire Code, the International Mechanical Code, the International Maintenance Code, the National Electric Code, and the Illinois State Plumbing Code.
<b>Permit required for any connection to a public sewer</b> Mattoon Code of Ordinances § 50.046	A permit would be needed to connect to the City of Mattoon sewer system.
<b>Permit required to take water from the City of Mattoon's water plant or distribution system</b> Mattoon Code of Ordinances § 51.016	A permit and a meter issued by the Public Works Director of the City of Mattoon would be required to take water from the City's distribution system.
<b>Permit Required for Building Occupancy</b> Mattoon Code of Ordinances § 159.67	A permit must be issued by the Building/Code Official stating that the building and use comply with all of the building and health laws.
<b>Private sewage disposal system permit</b> Mattoon Code of Ordinances § 50.026	A permit would be required for a private sewage disposal system issued by the Superintendent of the City of Mattoon.

**Table C.1-3. Permit or Approval Requirements to Construct and Operate the Proposed Facilities**

Permit or Approval	Description
<b>Texas State Permitting</b>	
<b>Air Construction Permit</b> 30 TAC Ch. 116	Applicable if it is determined that a Title I Prevention of Significant Deterioration permit under the federal CAA would not be required.
<b>Air Operating Permit</b> 30 TAC Ch. 122	<b><i>Required for non-major sources designated by EPA, through rulemaking, and as specified by federal requirements. If EPA designated the FutureGen facility as a non-exempt, non-major source, it would be required to obtain a federal, not a state, operating permit. Texas has no State Operating Permit program.</i></b>
<b>Hydrostatic Test Water Discharge Permit</b> Texas Water Code, Section 26.040	If hydrostatic test water is discharged, a Texas Pollutant Discharge Elimination System General Permit No. TXG670000 would be required.
<b>Texas Pollution Discharge Elimination System (TPDES) General Construction Stormwater Permit</b> Texas Water Code, Section 26.040	TPDES permit for stormwater discharge required for construction sites disturbing 1 acre or more of land.
<b>TPDES General Industrial Stormwater Permit</b> Texas Water Code, Section 26.040	Permit for stormwater discharges associated with industrial activity.
<b>Permit for Groundwater Withdrawal and Monitoring Wells</b> Texas Water Code, Chapter 36	Permits would be required from the Mid-East Texas Groundwater Conservation District if it is determined that groundwater from Leon or Freestone counties is needed for the plant.
<b>Prevention of Significant Deterioration (PSD) Permit</b> 40 CFR 52.21	Required if the plant would have the potential to emit 100 tons per year or more of a pollutant subject to regulation under the CAA. Regulated pollutants include SO <sub>2</sub> , NO <sub>x</sub> , and CO. A PSD Permit would be issued by the state or local air pollution control agency.
<b>Registration with the Public Utility Commission of Texas</b> Public Utility Commission Substantive Rule, Section 25.109	Power generation companies must register with the Public Utility Commission of Texas.
<b>RCRA Permit Program</b> 30 TAC Ch. 305	A RCRA permit would be required for treatment and storage of hazardous waste if the waste quantities and storage durations exceed applicable thresholds. It is anticipated that hazardous waste management would occur under generator accumulation standards, subject to notification and reporting requirements but exempt from permitting.
<b>Solid Waste Management, On-Site Disposal of Nonhazardous Industrial Solid Waste</b> 30 TAC Ch. 335	Any hazardous waste generated and disposed or treated on site would be subject to <b><i>requirements of</i></b> this chapter.
<b>Underground Injection Control Permit</b> 30 TAC Ch. 331 and Railroad Commission of Texas (RRC) 16 TAC 3.9 and 3.46	A CO <sub>2</sub> injection well would be a Class V well in Texas. Authorization from the Texas <b><i>Commission</i></b> on Environmental Quality is required for injection below the base of usable quality water and that is not <b><i>productive</i></b> of oil, gas, or geothermal resources. Authorization from the Railroad Commission of Texas is required for injection into a reservoir that is productive of oil, gas, or geothermal resources.

**Table C.1-3. Permit or Approval Requirements to Construct and Operate the Proposed Facilities**

<b>Permit or Approval</b>	<b>Description</b>
Septic Permit for Onsite Sewage Facility Texas Health and Safety Code, Ch. 366 and 30 TAC Ch. 285	A permit would be required for an onsite sewage facility.

**List of References:**

U.S. Environmental Protection Agency (EPA). 2006a. *National Ambient Air Quality Standards (NAAQS)*. Accessed November 8, 2006 at <http://www.epa.gov/air/criteria.html> (last updated October 13, 2006).

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## APPENDIX D

### RISK ASSESSMENT METHODOLOGY

There are numerous human-health and ecological issues associated with the construction and operation of any large coal-fueled electric power generation facility. The FutureGen Project would represent a technological advancement in power generation that integrates advanced coal gasification technology, the production of hydrogen from coal, electric power generation, and carbon dioxide (CO<sub>2</sub>) capture and geologic storage. Carbon capture and storage technology is an innovative method for reducing greenhouse gas emissions, but the new technology comes with added design and operational complexities and potential health, safety and environmental risks. The FutureGen Project Risk Assessment (TetraTech, 2007) addressed the potential human-health and environmental effects associated with the capture of CO<sub>2</sub> and other trace gases at the power plant, gas transportation via pipeline to the geologic storage site, and subsurface storage. The risk assessment was conducted to support the preparation of an Environmental Impact Statement (EIS) for the FutureGen Project. The technical approach and methodology employed in this risk assessment are described below.

The approach to risk analysis for CO<sub>2</sub> capture and sequestration in geologic formations is still evolving. However, a substantial amount of information exists on the assessment and management of releases associated with the geologic storage of CO<sub>2</sub> from natural-gas storage, deep injection of hazardous waste, and the injection of either gaseous or supercritical CO<sub>2</sub> in hydrocarbon reservoirs for enhanced oil recovery. There are also numerous projects underway at active CO<sub>2</sub> injection sites to determine the long-term fate of CO<sub>2</sub> injected into deep geological formations. The FutureGen Project Risk Assessment relied heavily on the technical approaches and findings from these previous and ongoing projects. However, the FutureGen Project Risk Assessment was based largely on site-specific information. The risk assessment also utilized a common set of performance characteristics and hazard scenarios to provide a basis for comparing the four candidate sites.

The risk assessment was conducted according to a work plan reviewed by a panel of carbon capture/storage and risk assessment experts. The approved work plan provided a detailed description of the approach applied to the analysis of the identified pre- and post-injection risk issues. There were five primary elements outlined in the risk assessment:

- Conceptual Site Models (CSMs)
- Toxicity Assessment
- Risk Evaluation for the Capture and Transport of Gaseous Emissions (Pre-Injection)
- Risk Evaluation for the Storage of CO<sub>2</sub> and Hydrogen Sulfide (H<sub>2</sub>S) in Subsurface Reservoirs (Post-Injection)
- Risk Screening and Performance Assessment

A central task in the FutureGen Project Risk Assessment was the development of the conceptual site models (CSMs) for the four proposed locations. Potential exposure pathways of gas release during capture, transport and storage were identified. The chemicals involved in the capture and sequestration process and their potential short-term and long-term health effects were identified and discussed. Then, detailed descriptions for each of the four candidate sites were provided. These descriptions included population and community characteristics, general surface features, aquatic and terrestrial ecology, and the geologic features that were critical to the determination of the feasibility of subsurface injection and sequestration of gaseous emissions from the power plant.

A toxicity assessment was conducted to review chemical toxicity data and to identify chemicals of potential concern that could cause adverse human-health and environmental effects. These data provided the basis for the comparison of estimated exposures and the assessment of potential risks. CO<sub>2</sub> was the main chemical in this analysis, but toxicity data were also compiled and evaluated for other chemicals, including H<sub>2</sub>S, carbon monoxide, methane, mercury, and cyanide. The most important outcome of this

analysis was the selection of benchmark concentrations for chemicals of potential concern. These benchmarks, developed for each potential exposure scenario and several different effect levels, served as the basis for the evaluation of potential risk to human populations and identified ecological receptors.

The risks associated with the capture and transport of gaseous emissions, prior to injection into the geologic reservoirs, were evaluated separately from the post-injection or subsurface phases of the FutureGen Project. The surface portion of the risk assessment evaluated the potential risks associated with the plant and aboveground facilities for separating, compressing and transporting CO<sub>2</sub> to the injection site. Failures of the engineered system evaluated included: pipeline rupture, pipeline puncture (i.e., releases through a small hole), and rupture of the wellhead injection equipment. Accidental releases from the pipeline or wellhead, although expected to be infrequent, could potentially affect the general public in the vicinity of a release. The carbon dioxide pipeline failure frequency was calculated based on data contained in the on-line library of the Office of Pipeline Safety (<http://ops.dot.gov/stats/IA98.htm>). Accident data from 1994-2006 indicated that 31 accidents occurred during this time period. DOE chose to categorize the two accidents with the largest carbon dioxide releases (4000 barrels and 7408 barrels) as rupture type releases, and the next four highest releases (772 barrels to 3600 barrels) as puncture type releases. For comparison, 5 miles (8 km) of FutureGen pipeline would contain about 6500 barrels, depending on the pipeline diameter. Based on data in Gale and Davison (2004), the rupture and puncture failure frequencies were calculated to be  $5.92 \times 10^{-5}/(\text{km-yr})$  and  $1.18 \times 10^{-4}/(\text{km-yr})$ , respectively, assuming the total length of pipeline involved was approximately 1616 miles (2600 km). The annual pipeline failure frequencies used in this assessment were calculated based on the site-specific pipeline lengths. The failure rate of wellhead equipment during operation was estimated as  $2.02 \times 10^{-5}$  per well per year based on natural gas injection-well experience from an IEA GHG Study (Papanikolaou et al., 2006).

Simulation models were used to estimate the emission of CO<sub>2</sub> for the aboveground release scenarios when the gas is in a supercritical state. The SLAB model developed by the Lawrence Livermore National Laboratory and approved by U.S. EPA was used to simulate denser-than-air gas releases for both horizontal jet and vertically elevated jet scenarios. The model simulations were conducted for the case with CO<sub>2</sub> at 95 percent and H<sub>2</sub>S at 100 parts per million by volume (ppmv). The state of the contained captured gas prior to release is important with respect to temperature, pressure, and the presence of other constituents. Release of CO<sub>2</sub> under pressure would likely cause rapid expansion and then reduction in temperature and pressure, which can result in formation of solid-phase CO<sub>2</sub>, as explained in Appendix C-III of the risk assessment. The estimated quantity of solid-phase formed was 26 percent of the volume released; therefore 74 percent of the volume released from a pipeline rupture or puncture was used as input to the SLAB model for computing atmospheric releases of CO<sub>2</sub> and H<sub>2</sub>S. Carbon dioxide is heavier than air and subsequent atmospheric transport and dispersion can be substantially affected by the temperature and density state of the initially released CO<sub>2</sub>. The meteorological conditions at the time of the release would also affect the behavior and potential hazard of such a release.

The potential effects of CO<sub>2</sub> and H<sub>2</sub>S releases from pipeline ruptures and punctures were evaluated using an automated "pipeline-walk" analysis. The "pipeline-walk" analysis was developed to determine impacts of pipeline accidents along the entire length of the proposed CO<sub>2</sub> pipelines. The analysis examined each pipeline at 300-meter (984-foot) intervals, starting at the power plant and ending at the injection site. Site specific meteorological data were applied and an accident (rupture or puncture) computer simulation model (SLAB model) was run for 112 defined atmospheric states to determine the potential impact zone. At each 300-meter interval, population density information from the 2000 Census was applied to each of the impact zones to provide a weighted-average or expected number of persons affected. The total number of persons reported as affected by a release at each interval was determined by multiplying the number of individuals in each segment of the impact zone by the proportion of time (relative importance) of each of the 112 atmospheric states. The methodology is described in detail in Section 4.4.2 and Appendix C-IV of the risk assessment) The predicted concentrations in air were used to

estimate the potential for exposure and any resulting impacts on plant workers, nearby residents, sensitive receptors, and ecological receptors.

The post-injection risk assessment presents the analysis of potential impacts from the release of CO<sub>2</sub> and H<sub>2</sub>S after the injection into subsurface reservoirs. A key aspect of this analysis was the compilation of a database that included the site characteristics and results from studies performed at other CO<sub>2</sub> storage locations, and from sites with natural CO<sub>2</sub> accumulations and releases.

The analog-site database includes information on leakage of CO<sub>2</sub> from existing injection sites and natural releases. Information has been obtained on four existing injection sites, 16 natural CO<sub>2</sub> sites in sedimentary rock formations, and 17 sites in volcanic or geothermal areas. The types of information collected include: description of the zone with CO<sub>2</sub>, physical characteristics of the primary and secondary seals and secondary porous zone (if present), information on shallow groundwater and surface water, nearby faults, numbers of nearby wells, the amount of CO<sub>2</sub> released from leakage or a natural event, the conditions present at that time, and any known effects. Not all information was pertinent for a given site and not all the information could be obtained.

This database was used for characterizing the nature of potential risks associated with surface leakage through cap-rock seal failures, faults, fractures or wells. CO<sub>2</sub> leakage from the target reservoirs was estimated using a combination of relevant industry experience, natural analog studies, modeling, and expert judgment. Both qualitative and quantitative analyses were conducted to evaluate risks from potential releases. A qualitative risk screening of the four candidate sites was presented based upon a systems analysis of the site features and scenarios portrayed in the CSM. Risks were qualitatively weighted and prioritized using procedures identified in a health, safety, and environmental risk screening and ranking framework for geologic CO<sub>2</sub> storage site selection. More detailed evaluations were conducted by estimating potential gas emission rates and durations from the analog database for a series of release scenarios and using the results of model simulations of subsurface leakage presented in the final Environmental Information Volumes.

Three scenarios could potentially cause acute effects: upward leakage through the CO<sub>2</sub> injection wells; upward leakage through the deep oil and gas wells; and upward leakage through undocumented, abandoned, or poorly constructed wells. Six scenarios could potentially cause chronic effects: upward leakage through caprock and seals by gradual failure; release through existing faults due to effects of increased pressure; release through induced faults due to effects of increased pressure (local over-pressure); upward leakage through the CO<sub>2</sub> injection wells; upward leakage through the deep oil and gas wells; and upward leakage through undocumented, abandoned, or poorly constructed wells. For the chronic-effects case for the latter three well scenarios, the gas emission rates were estimated to be at a lower rate for a longer duration. The atmospheric transport of released gas from these potential post-injection releases was estimated through modeling using a U.S. Environmental Protection Agency-approved screening model. The predicted concentrations in air were used to estimate the potential for exposure and any resulting impacts on workers, nearby residents, sensitive receptors, and ecological receptors. Other scenarios including catastrophic failure of the caprock and seals above the sequestration reservoir and fugitive emissions were discussed, but not evaluated in a quantitative manner.

The risk screening and performance assessment section of the risk assessment presents comparisons for each site to appropriate health-effects criteria for CO<sub>2</sub> and H<sub>2</sub>S. Risk ratios (i.e., the ratio between the predicted atmospheric gas concentration and the benchmark health-effects criteria) were calculated for both human and ecological receptors. A risk ratio less than one indicates that the effect is unlikely to occur. Higher risk ratios generally represent the potential for higher levels of health concern, although regulatory derived toxicity values include safety factors to ensure protection of sensitive individuals. Probabilities for each of the identified exposure scenarios were calculated from the best data presently available for annual frequencies and for site-specific factors that affect the outcomes at each site. A range of probabilities associated with the identified exposure scenarios was presented and discussed.

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References:

- Gale, J. and J. Davison. 2004. "Transmission of CO<sub>2</sub> - Safety and Economic Considerations." *Energy* 29 (9-10): 1319-1328.
- Papanikolaou, N., B. M. L. Lau, W. A. Hobbs and J. Gale. 2006. "Safe Storage of CO<sub>2</sub>: Experience from the Natural Gas Storage Industry." In *Proceedings of the 8th International Conference on Greenhouse Gas Control Technologies (GHGT-8)*, 19 - 22 June 2006. Trondheim, Norway.
- TetraTech, Inc. 2007. "Final Risk Assessment Report for the FutureGen Project Environmental Impact Statement." April 2007 (Revised). Lafayette, CA.

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## APPENDIX E AIR MODELING PROTOCOL

Air quality analyses are performed to determine whether emissions from construction and operation of a proposed new source, in conjunction with other applicable emissions increases and decreases from existing sources (i.e., modeled existing source impacts plus measured background), will cause or contribute to a violation of any applicable national ambient air quality standards (NAAQS) or Prevention of Significant Deterioration (PSD) increments.

### E.1 FUTUREGEN PROJECT DESIGN CASES

The Alliance in consultation with DOE developed an initial conceptual design for the generation of electricity from coal with capture and sequestration of CO<sub>2</sub>. To provide bounding conditions for the EIS analysis, a range of outputs were developed based on the four technology cases: Cases 1, 2, 3A and 3B. These cases share many components and processes in common (such as coal receiving and storage, oxygen supply, gas cleanup, and power generation), with the primary difference being the type of gasifier technology used (FG Alliance, 2007). Cases 1, 2, and 3A are stand-alone alternatives that are capable of meeting the design requirements of the project. The Alliance is considering a design in which an optional case, Case 3B, is coupled with either Case 1, 2, or 3A. Case 3B is a smaller, side-stream power train that would enable more research and development (R&D) activities than the main train of the power plant (Cases 1, 2, and 3A). Case 3A is similar to Case 1, except the gasifier output is greater.

One goal of the FutureGen Project is to demonstrate gasification technology over a range of different coal types. Therefore, the facility would be designed to use bituminous, sub-bituminous, and *possibly* lignite coals. For developing the performance boundary, the Alliance assumed for each technology design case the most stringent operating condition using three coal types: Powder River Basin (PRB) sub-bituminous, Illinois Basin (Illinois) bituminous, and Northern Appalachia Pittsburgh (Pittsburg) bituminous. To provide a conservative assessment of impacts, the Alliance's assumptions and quantities for air emissions represent the upper bound of the range of possible impacts. The upper bound for air emissions was derived by assuming facility operations would result in the highest emission rate for individual pollutants (e.g., nitrogen dioxide [NO<sub>2</sub>]) selected from among Cases 1, 2, and 3A plus Case 3B, including any unplanned restart emissions as a result of plant upset. Therefore, while used to develop the performance boundary, the aggregate upper bound is worse than any single technology case under consideration. Table E-1 provides a summary of the air emissions for each technology design case.

**Plant upset** is a serious malfunction of any part of the IGCC process train and usually results in a sudden shutdown of the combined-cycle unit's gas turbine and other plant components.

**Table E-1. Stack Emissions for Each Technology Case Per Coal Type <sup>1</sup>**

	Case 1			Case 2			Case 3A			Case 3B		
	Pittsburgh	Illinois	PRB									
<b>Coal Data</b>												
Sulfur (wt% dry)	2.3	3.1	0.3	2.3	3.1	0.3	2.3	3.1	0.3	2.3	3.1	0.3
mass Sulfur (lb/hr)	5204.4	7761.8	897.9	4939.1	7630.0	1129.9	4826.5	7453.3	1095.2	2260.7	3492.4	493.1
mass SO <sub>2</sub> (lb/hr)	10408.8	15523.7	1795.9	9878.2	15260.1	2259.9	9653.0	14906.5	2190.4	4521.4	6984.8	986.3
Coal Input (lb/hr)	224745	248370	281167	213287	244153	353809	208425	238577	342790	97625	111791	154349
Coal HHV (Btu/lb)	13001	11505	8567	13001	11505	8567	13001	11505	8567	13001	11505	8567
Coal Input (MMBtu/hr)	2922	2857	2409	2773	2809	3031	2710	2745	2937	1269	1286	1322
<b>Emission Rates (lb/MMBtu)</b>												
SO <sub>x</sub>	0.0003	0.0004	0.0001	0.0005	0.0008	0.0001	0.0005	0.0008	0.0001	0.0066	0.0099	0.0014
NO <sub>x</sub>	0.0448	0.0438	0.0383	0.0447	0.0438	0.0409	0.0499	0.0492	0.0448	0.0496	0.0476	0.0499
PM <sub>10</sub>	0.0063	0.0065	0.0075	0.0067	0.0068	0.006	0.0069	0.0069	0.0062	0.007	0.0084	0.0044
CO	0.0454	0.0445	0.0389	0.0453	0.0445	0.0415	0.0506	0.0499	0.0454	0.0201	0.0193	0.0203
VOC	0.0015	0.0014	0.0012	0.0015	0.0014	0.0013	0.0016	0.0016	0.0015	0.0028	0.0027	0.0028
Hg	0.7153	0.5386	0.5799	0.7153	0.5386	0.5799	0.7153	0.5386	0.5799	0.7153	0.5386	0.5799

**Table E-1. Stack Emissions for Each Technology Case Per Coal Type <sup>1</sup>**

	Case 1			Case 2			Case 3A			Case 3B		
	Pittsburgh	Illinois	PRB									
<b>Emission Rates (lb/hr)</b>												
SO <sub>x</sub>	0.9	1.1	0.2	1.4	2.25	0.3	1.4	2.2	0.3	8.4	12.7	1.9
NO <sub>x</sub>	130.9	125.2	92.3	124.0	123.0	124.0	135.2	135.0	131.6	63.0	61.2	66.0
PM <sub>10</sub>	18.4	18.6	18.1	18.6	19.1	18.2	18.7	18.9	18.2	8.9	10.8	5.8
CO	132.7	127.2	93.7	125.6	125.0	125.8	137.1	137.0	133.3	25.5	24.8	26.8
VOC	4.38	4.0	2.9	4.2	3.9	3.9	4.3	4.39	4.41	3.6	3.5	3.7
Hg	0.00209	0.00154	0.00140	0.00198	0.00151	0.00176	0.00194	0.00148	0.00170	0.00091	0.00069	0.00077
<b>Emission Rates (tons/yr)</b>												
SO <sub>x</sub>	3.3	4.3	0.9	5.2	8.37	1.1	5.0	8.2	1.1	31.2	47.4	6.9
NO <sub>x</sub>	487.3	466.0	343.5	461.5	458.1	461.5	503.4	502.8	489.8	234.4	227.9	245.7
PM <sub>10</sub>	68.5	69.1	67.3	69.2	71.1	67.7	69.6	70.5	67.8	33.1	40.2	21.7
CO	493.9	473.4	348.8	467.7	465.4	468.3	510.5	509.9	496.4	95.0	92.4	99.9
VOC	16.3	14.9	10.8	15.5	14.6	14.7	16.1	16.4	16.4	13.2	12.9	13.8
Hg	0.0078	0.0057	0.0052	0.0074	0.0056	0.0065	0.0072	0.0055	0.0063	0.0034	0.0026	0.0029

<sup>1</sup> Based on maximum operation load of 85 percent (i.e., 7446 hours per year).  
Source: FG Alliance, 2007.

## E.2 MODELED EMISSIONS RATES AND ASSUMPTIONS

The proposed FutureGen Project's estimated maximum annual air emissions (see Table E-2) represent an upper bound for assessing potential impacts for this EIS. The estimates are based on performance data from numerous manufacturer vendors and are not representative of a complete coal-to-product integrated design. *However, a power plant built with these conceptual designs, under normal steady-state operations, could meet the specified FutureGen Project Performance Targets (see Section 2.5.6).* Because the FutureGen Project would serve as a research and development (R&D) platform, DOE and the Alliance estimate that the power plant availability would be 85 percent. Full-scale testing, research, and operation would be conducted for a period of four years (i.e., the R&D period); however operation of the plant for commercial use could continue for decades.

**Table E-2. FutureGen Project's Estimated Maximum Air Emissions (tons per year)**

Air Pollutant	Maximum Emissions of Case 1, 2, or 3A <sup>1</sup>	Maximum Emissions of Case 3B <sup>2</sup>	Maximum Unplanned Restart Emissions	FutureGen Project's Estimated Maximum Air Emissions <sup>3</sup>
Sulfur Oxides (SO <sub>x</sub> )	8.37	47.40	487 <sup>5</sup>	543
Nitrogen Oxides (NO <sub>x</sub> ) <sup>4</sup>	503.4	245.7	9	758
Particulate Matter (PM <sub>10</sub> /PM <sub>2.5</sub> )	71	40	0	111
Carbon Monoxide (CO)	510	100	1	611
Volatile Organic Compounds (VOCs)	16	14	0	30
Mercury (Hg)	0.008	0.003	0	0.011

<sup>1</sup> Cases 1, 2, or 3A represent the main train of the power plant.

<sup>2</sup> Case 3B represents a smaller, side-steam power train.

<sup>3</sup> Equal the sum of the maximum emissions of Case 1, 2, or 3A plus maximum emissions of Case 3B plus the maximum unplanned restart emissions. Based on maximum operating load of 100 percent and 85 percent plant availability.

<sup>4</sup> NO<sub>x</sub> emissions from coal combustion are primarily nitric oxide (NO); however, for the purpose of the air dispersion modeling it was assumed that all NO<sub>x</sub> emissions are nitrogen dioxide (NO<sub>2</sub>). One of the technologies being considered for the FutureGen Project is post-combustion selective catalytic reduction (SCR), which would reduce the annual NO<sub>2</sub> emissions in this base case to 249 tons per year.

<sup>5</sup> SO<sub>x</sub> emissions from coal combustion systems are predominantly in the form of sulfur dioxide (SO<sub>2</sub>). SO<sub>2</sub> emissions would be higher during restarts since the syngas flow to the flare would not have been processed for sulfur recovery. Source FG Alliance, 2007.

The proposed FutureGen Project's estimated maximum air emissions include emissions from steady-state, planned startups, and unplanned restarts conditions. Steady-state is the normal operating condition of the proposed power plant, when the system is operating properly. The maximum steady-state air emissions are the maximum air emissions of the Cases 1, 2, and 3A (i.e., the main train of the power plant) plus the maximum air emissions for Case 3B (i.e., the smaller, side-steam power train).

During unplanned restarts, there are intermittent increases of emissions due to the need to flare process gases for a short period of time. Although unplanned restart events cannot be predicted, the Alliance has conceptually categorized these emissions by unit operations that would likely cause the event and they include: the air separation unit trip; the gasifier trip, the acid gas removal system trip, the claus unit trip, and the power island trip. Table E-3 provides the number of unplanned restarts associated with

these five events that would be likely for the first through the fourth year of operations, as well as DOE estimated restarts for the years after the R&D period.

**Table E-3. Potential Unplanned Restart Events Per Year During the R&D Operations Phase**

<b>Affected Units</b>	<b>Year One</b>	<b>Year Two</b>	<b>Year Three</b>	<b>Year Four</b>	<b>Year Five and beyond</b>
Air Separation Unit	6	4	3	3	1
Gasifier (including coal prep)	8	2	2	1	0
Acid Gas Removal system (including shift unit & CO <sub>2</sub> compressor)	7	6	5	5	1
Claus Unit	1	0	0	0	0
Power Island	7	6	4	4	1
<b>Total each year</b>	<b>29</b>	<b>18</b>	<b>14</b>	<b>13</b>	<b>3</b>

Source: FG Alliance, 2006e.

The Alliance estimates that the first year of the R&D period would have the most unplanned restarts; therefore, the first year served as the upper-bound for modeling analysis. During the fifth year, it is assumed that the R&D period would come to an end and normal operations would begin.

To estimate air quality impacts associated with unplanned restarts emissions, DOE developed a “worst case” profile based on the occurrence of a single plant upset mode following prolonged steady state operations with an immediate return to steady-state emissions. The steady-state and unplanned restart emissions used for the air dispersion modeling analysis are provided in Table E-4. The modeled emissions rates are the same for each of the four proposed power plant sites. Variances in actual emissions resulting from ambient operating conditions at each proposed site were not factored into the emission estimate. Unplanned restarts air emissions during plant upset tend to be very high compared to those during steady-state operation because of the mass emissions rates occurring instantaneously during a short period (i.e., minutes or hours). Assumptions used for the duration of plant upset events are provided in Table E-5. The modeled scenario (Year One) is likely overly conservative in that a given plant upset event may require some time where the facility would be completely or partially idled. In the case where the facility was idled, there would be some period (pre-restart) when facility emissions would be less than steady state and the impact to air quality would likely be lower than the modeled scenario.

**Table E-4. Estimates of Modeled Air Emissions Rates**

Pollutant	Total Annual <sup>1</sup>	Steady State <sup>2</sup>	Unplanned Restarts <sup>3,4</sup>	Total Annual <sup>1</sup>	Steady State <sup>2</sup>	Unplanned Restarts <sup>3,4</sup>
	tons per year			grams per second <sup>5</sup>		
SO <sub>2</sub>	543	55.77	487.30	18.38	1.89	2,792.74
NO <sub>2</sub>	758	749.06	8.79	25.65	25.35	50.66
PM <sub>10</sub>	111	111	0	3.77	3.77	0
CO	611	610.4	0.93	20.69	20.66	20.66
Hg	0.011	0.011	0	0.00038	0.00038	0

<sup>1</sup> Emission rates used to model impacts for pollutants annual averaging periods.

<sup>2</sup> Steady-state emissions are expected during normal plant operating conditions. Also used to model impacts of criteria pollutants that have NAAQS for short-term averaging period (i.e., 1-hour, 3-hour, 8-hour, and 24-hour) during normal plant operating conditions.

<sup>3</sup> Maximum unplanned restart emissions based on Model Increment 2 because of the maximum mass emissions rate produced during that period of plant upset (see Table E-5). Also used to model impacts of criteria pollutants that have NAAQS for short-term averaging periods during plant upset conditions.

<sup>4</sup> Zero indicates no unplanned restart emissions.

<sup>5</sup> Grams per second converted from tons per year based on duration of plant upset as presented in Table E-5.

Source: FG Alliance, 2007.

Because design parameters for the proposed power plant are limited, surrogate data from similar existing or permitted units were used to fill data gaps. Table E-5 summarizes the input parameters that were used in the air dispersion modeling analysis.

**Table E-5. Air Quality Modeling Basis for the Proposed FutureGen Power Plant Operations Impact Analysis**

Parameter	Modeling Basis
<b>1. Technology design cases</b>	<ul style="list-style-type: none"> <li>• Case 1</li> <li>• Case 2</li> <li>• Case 3A</li> <li>• Case 3B</li> </ul> <p>Case 1, 2, or 3A would be the main train for the power plant. Case 3B would be a smaller, side-steam power train, which is being considered as an option coupled with Case 1, 2, or 3A.</p>

**Table E-5. Air Quality Modeling Basis for the  
Proposed FutureGen Power Plant Operations Impact Analysis**

<b>Parameter</b>	<b>Modeling Basis</b>
<b>2. Stack input parameters</b>	<p>Modeling based on an exhaust stack located at the center of the site. The stack parameters are :</p> <ul style="list-style-type: none"> <li>• Stack 250 feet (76 m) (FG Alliance, 2006).</li> <li>• Stack velocity: 65 ft/sec (19.8 m/sec) (ECT, 2006).</li> <li>• Volumetric flow: 137,919.087 ft<sup>3</sup>/hr (based on modeling of combined exhaust flows from Case I-3A plus Case 3B design using the ASPEN model).</li> <li>• Stack gas temperature: 300 °F (148.9 °C) (based on modeling of combined exhaust flows from Case I-3A plus Case 3B design using the ASPEN model).</li> <li>• Stack inside diameter: 27.4 feet (8.4 m) (calculated based on stack gas exit velocity and model output volumetric flow).</li> <li>• Ambient temperature: 59 °F (15.0 °C) (best engineering judgment).</li> <li>• Exhaust gas ambient temperatures (for SCREEN 3): Assume 20°F, 59°F, 70°F, and 95°F (-6.7°C, 15°C, 21°C, and 35.0°C).</li> </ul>
<b>3. Model used</b>	<p>AERMOD A detailed air dispersion analysis was performed using region-specific meteorological data.</p>
<b>4. Receptor grids</b>	<p>A Cartesian grid system was used with hypothetical fence-line receptors and approximate locations of sensitive receptors.</p>
<b>5. Meteorological data</b>	<p>AERMOD – Representative 5-year hourly surface and upper air meteorological data processed with AERMET, EPA's meteorological data processor.</p>
<b>6. Land type</b>	<p>Assessed from land-use data.</p>
<b>7. Terrain data</b>	<p>USGS 7.5-minute Digital Elevation Model (DEM) files.</p>
<b>8. Terrain elevation</b>	<p>Determined by AERMAP, EPA's terrain data preprocessor, with USGS DEM files.</p>
<b>9. Sensitive receptor</b>	<p>From sensitive receptor list provided by the Alliance for each site (FG Alliance, 2006).</p>
<b>10. Operating hours and fuel firing loads</b>	<p>Unplanned restarts and steady state hours based on an 85% plant availability, or 7446 hours per year.</p> <p>Modeling based on 100% base load.</p>

**Table E-5. Air Quality Modeling Basis for the Proposed FutureGen Power Plant Operations Impact Analysis**

Parameter	Modeling Basis																																													
<p><b>11. Plant operation scenario</b></p>	<p>Power plant operation is assumed to produce normal emissions at a steady-state and suddenly ramping up to higher emissions because of unplanned restart (as a result of plant upset) for a short period and then dropping back down to steady-state emissions (see 12 below).</p> <p>The unplanned restart emissions are developed based on the duration and emissions associated with trip of the gasifier or the acid gas removal (AGR) system. These two plant upset modes, assumed to have the same profile, result in the highest instantaneous emissions rates of all plant upset modes, and represent the longest duration, with the exception of one plant upset mode (air separation unit [ASU] trip). While the ASU trip would be significantly longer (70 hours of warming the gasifier with modest amounts of natural gas), the long duration of minimal plant emissions prior to restart is expected to have a reduced impact on ambient air quality compared to a plant upset mode following prolonged steady state emissions. Furthermore, based on the estimated frequency of occurrence, gasifier and AGR trips combined represent approximately half of all plant upset modes in any given year.</p>																																													
<p><b>12. Plant upset duration (hours)</b></p>		SO <sub>2</sub>	NO <sub>2</sub>	CO																																										
	ASU Trip	2	4	70																																										
	Gasifier Trip	2	4	0.5																																										
	AGR Trip	2	4	0.5																																										
	Claus Trip	2	0	0																																										
	Power Island Trip	0	1.5	0.5																																										
<p><b>13. Modeled Emissions Rates</b></p>	<p>FutureGen Project's estimate of maximum air emissions (FG Alliance, 2007) (Year One operations) was used to develop annual, steady-state, and unplanned restart emissions. The modeling increments 1, 2, and 3 depict emission rates associated with the start of a plant upset mode, restarting the gasifier, and bringing the rest of the components online, respectively. From this analysis, Modeling Increment 2 represents the maximum emission interval.</p> <table border="1" data-bbox="472 1276 1421 1822"> <thead> <tr> <th></th> <th>Steady State</th> <th>Modeling Increment 1</th> <th>Modeling Increment 2</th> </tr> <tr> <th>Time Interval</th> <th>t<sub>0</sub></th> <th>t<sub>1</sub></th> <th>t<sub>1+2hr</sub></th> </tr> </thead> <tbody> <tr> <td>SO<sub>2</sub>, g/sec</td> <td>2</td> <td>2</td> <td>2,793</td> </tr> <tr> <td>NO<sub>2</sub>, g/sec</td> <td>25</td> <td>34</td> <td>51</td> </tr> <tr> <td>PM<sub>10</sub>, g/sec</td> <td>4</td> <td>1</td> <td>4</td> </tr> <tr> <td>CO, g/sec</td> <td>21</td> <td>15</td> <td>21</td> </tr> </tbody> </table> <table border="1" data-bbox="472 1570 1421 1822"> <thead> <tr> <th></th> <th>Modeling Increment 3</th> <th>Steady State</th> </tr> <tr> <th>Time Interval</th> <th>t<sub>1+2.5hr</sub></th> <th>t<sub>1+4hr</sub></th> </tr> </thead> <tbody> <tr> <td>SO<sub>2</sub>, g/sec</td> <td>2</td> <td>2</td> </tr> <tr> <td>NO<sub>2</sub>, g/sec</td> <td>51</td> <td>25</td> </tr> <tr> <td>PM<sub>10</sub>, g/sec</td> <td>4</td> <td>4</td> </tr> <tr> <td>CO, g/sec</td> <td>21</td> <td>21</td> </tr> </tbody> </table> <p>Maximum unplanned restart emissions (Table E-4) are based on Modeling Increment 2.</p>					Steady State	Modeling Increment 1	Modeling Increment 2	Time Interval	t <sub>0</sub>	t <sub>1</sub>	t <sub>1+2hr</sub>	SO <sub>2</sub> , g/sec	2	2	2,793	NO <sub>2</sub> , g/sec	25	34	51	PM <sub>10</sub> , g/sec	4	1	4	CO, g/sec	21	15	21		Modeling Increment 3	Steady State	Time Interval	t <sub>1+2.5hr</sub>	t <sub>1+4hr</sub>	SO <sub>2</sub> , g/sec	2	2	NO <sub>2</sub> , g/sec	51	25	PM <sub>10</sub> , g/sec	4	4	CO, g/sec	21	21
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**Table E-5. Air Quality Modeling Basis for the Proposed FutureGen Power Plant Operations Impact Analysis**

Parameter	Modeling Basis
<p><b>14. Steady-state and unplanned restart emissions profile</b></p>	<p>The steady-state and unplanned restart emissions modeling profile are as follow:</p> <p><math>t_0 = 0.0</math> hours (see first steady-state column above)</p> <ul style="list-style-type: none"> <li>• steady state (main train + smaller, side-steam power train) plant emissions</li> </ul> <p><math>t_1 =</math> approximately 12.0 hours (model run to reach steady state downwind concentrations) (see “Modeling Increment 1” above).</p> <ul style="list-style-type: none"> <li>• Main train system, gasifier or AGR shutdown = start of plant upset.</li> <li>• Shut down of all main train systems, side-steam power train system continues to operate at steady-state.</li> <li>• Start Natural Gas burners only to keep main train gasifier warm.</li> <li>• For main train system, begin only emissions of CO + NO<sub>2</sub>, both at plant upset rates (w/o main train steady-state emissions)</li> <li>• Side-steam power train system continues uninterrupted (full steady-state emissions)</li> </ul> <p><math>t_{1+2hr} = 14.0</math> hours (see “Modeling Increment 2” above)</p> <ul style="list-style-type: none"> <li>• Restart main train gasifier + turbine.</li> <li>• Turn off natural gas burners.</li> <li>• Begin steady-state emissions + NO<sub>2</sub> at plant upset rate + SO<sub>2</sub> at plant upset rate.</li> <li>• Side-steam power train system continues uninterrupted (full steady-state emissions).</li> </ul> <p><math>t_{1+2.5 hr} = 14.5</math> hours (see “Modeling Increment 3” above)</p> <ul style="list-style-type: none"> <li>• Restart main train AGR.</li> <li>• Begin steady-state emissions + NO<sub>x</sub> at plant upset rates.</li> <li>• Side-steam power train system continues uninterrupted (full steady-state emissions).</li> </ul> <p><math>t_{1+4.0hr} = 16.0</math> hours (see last “steady state” column above)</p> <ul style="list-style-type: none"> <li>• Assume the system has no SCR to restart.</li> <li>• Begin steady-state only emissions.</li> <li>• Begin CO<sub>2</sub> capture.</li> <li>• End of emissions associated with plant upset.</li> </ul>

### E.3 AIR MODELING ANALYSIS

DOE conducted a refined air modeling using detailed meteorological, terrain and other input data to provide accurate estimates of emissions impacts using the EPA’s AERMOD dispersion modeling system. EPA recommends the AERMOD as a preferred air dispersion model for use in a wide variety of regulatory applications. The AERMOD modeling system consists of meteorological and terrain preprocessing programs (AERMET and AERMAP, respectively) in addition to the main AERMOD dispersion model. The following are three key surface characteristics required by AERMET:

- Albedo is defined as the fraction of total incident solar radiation reflected by the surface. Typical values range from 0.1 for thick deciduous forests to 0.90 for fresh snow.
- Bowen ratio is the ratio of the sensible heat flux (H) to the latent (evaporative) heat flux (E). It is an indicator of surface moisture and is used for determining planetary boundary layer parameters for convective conditions. According to AERMET user manual, midday values of the Bowen ratio range from 0.1 over water to 10.0 over desert terrain.
- Surface roughness length is related to the height of obstacles to the wind flow (i.e., a measure of the roughness of surface cover) and is, in principle, the height at which the mean horizontal wind speed is zero. Values range from less than 0.001 meter over a calm water surface to 1 meter or more over a forest or urban area.

AERMOD is a comprehensive steady-state plume model system that incorporates air dispersion dynamics based on planetary boundary layer turbulence structure and scaling concepts, including treatment of both surface and elevated sources, and both simple and complex terrain. As recommended by EPA's Guideline on Air Quality Models (GAQM), which is available as Appendix W of 40 CFR 51, the model was executed using EPA's default regulatory options. The concentration calculation option was selected. Based on predominant land use in the project area, rural dispersion coefficient was specified. Also, the concentration results were obtained for ground level receptors. The modeling was performed using "ISC-AERMOD VIEW" software package, which is an interface for the ISC and AERMOD models developed by Lakes Environmental Software, Inc.

### E.3.1 AERMOD MODELING APPROACH

Due to lack of full information on proposed site buildings and structures, building downwash was not included in the modeling. The stack parameters defined in Table E-5 were used for model input assuming all emissions were exhausted from a single HRSG stack. Other modeling variables are described in Table E-5. Modeling for nitrogen oxide (NO<sub>x</sub>) was performed conservatively assuming 100 percent conversion to NO<sub>2</sub>. The model was separately executed for NO<sub>2</sub>, SO<sub>2</sub>, and PM<sub>10</sub> using a nominal 1 g/sec unit emission rate and the unit emission impacts were adjusted to reflect annual emission rates for average annual operating periods of each pollutant. There is no annual averaging period for CO. For short-term averaging period for CO and PM<sub>10</sub>, the nominal 1 g/s unit emission rate was also used and the higher of the steady-state or unplanned restart emissions rates were adjusted to determine impact. There is no short-term averaging period for NO<sub>2</sub>.

Because of the increase in emissions during unplanned restart for a short duration, for SO<sub>2</sub>, the short-term averaging periods (3-hrs and 24-hrs) were modeled using a variable emissions modeling tool in AERMOD. Additionally, since worst-case emissions and associated worst-case impacts during worst-case meteorological conditions are highly unlikely, short-term impacts from unplanned restart SO<sub>2</sub> emissions were modeled to determine if an exceedance of short-term standards would occur. The n<sup>th</sup> worst-case results were compared to the PSD increments and NAAQS standards.

Should the modeled concentrations exceed these standards, the probability of this potential exceedance is then calculated by determining the n<sup>th</sup> maximum concentration using the following equation:

$$\% \text{ Compliance} = (7446 * 5 - n) / (7446 * 5)$$

Impacts from unplanned restarts were modeled assuming that unplanned restart emissions occur over a two hour period. The remainder of the time would consist of steady state operations (1 hour for the 3-hour average and 22 hours for the 24-hour average period).

## **E.3.2 AERMOD INPUT PARAMETERS**

Actual meteorology and terrain elevations are incorporated in the model to provide more accurate impacts. Meteorological data was obtained from National Climatic Data Center (NCDC)/National Weather Service (NWS) weather stations. United States Geological Surveys (USGS) 7.5 minute DEM files were used to assign appropriate terrain elevations for both source and receptor locations within the modeling domain. USGS 7.5 Minute Quadrangle maps were used as site base maps. These model input parameters are further described below.

### **E.3.2.1 Meteorological Input Data**

#### **Mattoon and Tuscola, Illinois**

For the modeling for the proposed Mattoon Power Plant, a representative and recent 5-year record (2001 to 2005) of hourly surface meteorological data was obtained from the NCDC weather station at Mattoon/Charleston Coles County Airport (WMO No. 725317). The weather station is located in Mattoon and the data is therefore considered to be highly representative of the Mattoon project site. The upper air data was obtained from the upper air soundings taken by the National Weather Service in Lincoln, Illinois.

For the modeling for the proposed Tuscola Power Plant, a representative and recent 5-year record (2001 to 2005) of hourly surface meteorological data was obtained from the NCDC weather station at University of Illinois/Willard Airport at Champaign (WMO No. 725315). The weather station is located approximately 16 miles from Tuscola and the data is therefore considered to be reasonably representative of the Tuscola project site. The upper air data was obtained from the upper air soundings taken by the National Weather Service in Lincoln, Illinois (WMO No. 745600).

The meteorological data was first checked to ensure greater than 90% completeness for all parameters, per EPA requirements. Subsequently, missing data gaps were filled within a tolerable time interval based on EPA guidance procedures. Using AERMET (AERMOD's meteorological preprocessor), both surface and upper air multi-year data files were merged to create a single meteorological data file. In conjunction with site-specific characteristics, the file was then partitioned into a "surface" and "profile" files, which together provide a representative record of prevailing meteorology in the site vicinity. The three AERMET characteristics were determined based on the meteorological data station at which the surface data was collected (e.g., Mattoon/Charleston Coles County Airport for the Mattoon site), per Illinois EPA guidance. Values for seasonal averages of Albedo, Bowen Ratio, and Surface Roughness were computed for each sector, with values weighted by the fraction of land uses within each sector. Table E-6 and E-7 are calculation spreadsheets showing details of the surface characteristics determination. It should be noted that due to the proximity of the data station to the project site, the characteristics can reasonably be assumed to be equally applicable. Using high resolution satellite imagery, circles were constructed around the weather station. Each circle was scaled to a diameter of 6 km, following standard land-use analysis methodology. The circles were then divided into 12 equal sectors (each 30 degrees of arc). Each sector was analyzed for the relative contributions of land use as determined from the map details.

#### **Jewett and Odessa, Texas**

The Texas Commission on Environmental Quality's (TCEQ) Emissions Banking Modeling Team (EBMT) has prepared AERMOD meteorological data sets that are required to be used for air dispersion modeling in the state of Texas. The data sets are available by county and comprise a one-year (usually 1988) surface and upper air hourly data record and a similar five-year data set. These AERMOD data

sets have already been pre-processed by AERMET (AERMOD's meteorological processor) to produce "surface" and "profile" files, which together provide a reasonably representative record of prevailing meteorology in the site vicinities. The proposed Jewett Power Plant Site is spread over three counties, namely Leon, Freestone and Limestone counties. However, based on an initial review of the site plan and USGS topographic maps, the majority of the site will be located within Freestone County. Therefore, the meteorological data set for Freestone County was used for AERMOD modeling. The data used for the modeling for the proposed Jewett Power Plant site comprised NCDC surface hourly records from Waco, TX, and upper air data from Longview, TX. The proposed Odessa Power Plant site is located in Ector County. Therefore, the meteorological data set for Ector County was used for AERMOD modeling. The data for the proposed Odessa Power Plant site comprised NCDC surface hourly records from Midland, TX, and upper air data also from Midland.

The data record spanned the five-year period 1987 to 1991, and the processed files corresponding to "medium" surface roughness were selected based on a review of land use types in the vicinity of the project site and are shown in Tables E-8 (Jewett) and E-9 (Odessa). The preprocessed meteorological data sets provided by TCEQ incorporate appropriate values of the above three surface characteristics.

**Table E-6. Mattoon Land Use Surface Characterization**

<b>KMTO</b>	<b>Urban (Commercial)</b>	<b>Urban (Residential)</b>	<b>Grassland</b>	<b>Cultivated Land</b>	<b>Water</b>	<b>Deciduous Forest</b>	<b>Swamp</b>	<b>Coniferous Forest</b>
Sector 1 (0-30 degrees)		0.02	0.06	0.9		0.02		
Sector 2 (30-60 degrees)		0.05	0.1	0.82		0.03		
Sector 3 (60-90 degrees)		0.05	0.02	0.9		0.03		
Sector 4 (90-120 degrees)		0.05	0.05	0.85		0.05		
Sector 5 (120-150 degrees)		0.01	0.02	0.87		0.1		
Sector 6 (150-180 degrees)		0.05	0.1	0.05		0.8		
Sector 7 (180-210 degrees)		0.15	0.15	0.1		0.6		
Sector 8 (210-240 degrees)		0.05	0.05	0.85		0.05		
Sector 9 (240-270 degrees)		0.03	0.04	0.9		0.03		
Sector 10 (270-300 degrees)		0.02	0.03	0.9		0.05		
Sector 11 (300-330 degrees)		0.05	0.1	0.84		0.01		
Sector 12 (330-360 degrees)		0.01	0.1	0.87		0.02		
<b>Average</b>	<b>0</b>	<b>0.045</b>	<b>0.06833333</b>	<b>0.7375</b>	<b>0</b>	<b>0.14916667</b>	<b>0</b>	<b>0</b>

**Table E-6. Mattoon Land Use Surface Characterization**

Seasonal Land Use Parameters by Sector								
Winter	Albedo	Bowen Ratio	Surface Roughness		Spring	Albedo	Bowen Ratio	Surface Roughness
Sector 1 (0-30 degrees)	0.593	1.5	0.029006		Sector 1 (0-30 degrees)	0.142	0.328	0.06
Sector 2 (30-60 degrees)	0.6145	1.575	0.04871		Sector 2 (30-60 degrees)	0.1504	0.372	0.0861
Sector 3 (60-90 degrees)	0.0445	0.15	0.040002		Sector 3 (60-90 degrees)	0.0142	0.079	0.056
Sector 4 (90-120 degrees)	0.0725	0.225	0.050005		Sector 4 (90-120 degrees)	0.022	0.105	0.0775
Sector 5 (120-150 degrees)	0.0655	0.195	0.055002		Sector 5 (120-150 degrees)	0.017	0.088	0.106
Sector 6 (150-180 degrees)	0.4775	1.425	0.42501		Sector 6 (150-180 degrees)	0.121	0.65	0.83
Sector 7 (180-210 degrees)	0.4425	1.35	0.375015		Sector 7 (180-210 degrees)	0.12	0.63	0.6825
Sector 8 (210-240 degrees)	0.0725	0.225	0.050005		Sector 8 (210-240 degrees)	0.022	0.105	0.0775
Sector 9 (240-270 degrees)	0.0495	0.15	0.030004		Sector 9 (240-270 degrees)	0.015	0.067	0.047
Sector 10 (270-300 degrees)	0.05	0.15	0.035003		Sector 10 (270-300 degrees)	0.0142	0.067	0.0615
Sector 11 (300-330 degrees)	0.0825	0.24	0.03001		Sector 11 (300-330 degrees)	0.0262	0.097	0.04
Sector 12 (330-360 degrees)	0.0735	0.195	0.01501		Sector 12 (330-360 degrees)	0.0218	0.064	0.03
<b>Average</b>	<b>0.2198333</b>	<b>0.615</b>	<b>0.09856517</b>		<b>Average</b>	<b>0.05715</b>	<b>0.221</b>	<b>0.17950833</b>

**Table E-6. Mattoon Land Use Surface Characterization**

Seasonal Land Use Parameters by Sector								
Summer	Albedo	Bowen Ratio	Surface Roughness		Autumn	Albedo	Bowen Ratio	Surface Roughness
Sector 1 (0-30 degrees)	0.1964	0.544	0.222		Sector 1 (0-30 degrees)	0.18	0.75	0.0716
Sector 2 (30-60 degrees)	0.2036	0.624	0.248		Sector 2 (30-60 degrees)	0.1892	0.839	0.0935
Sector 3 (60-90 degrees)	0.0152	0.125	0.066		Sector 3 (60-90 degrees)	0.0166	0.15	0.0492
Sector 4 (90-120 degrees)	0.023	0.155	0.095		Sector 4 (90-120 degrees)	0.025	0.2	0.0655
Sector 5 (120-150 degrees)	0.0172	0.066	0.137		Sector 5 (120-150 degrees)	0.0178	0.14	0.0852
Sector 6 (150-180 degrees)	0.122	0.42	1.075		Sector 6 (150-180 degrees)	0.125	1	0.666
Sector 7 (180-210 degrees)	0.123	0.6	0.87		Sector 7 (180-210 degrees)	0.129	1.05	0.5565
Sector 8 (210-240 degrees)	0.023	0.155	0.095		Sector 8 (210-240 degrees)	0.025	0.2	0.0655
Sector 9 (240-270 degrees)	0.0156	0.101	0.058		Sector 9 (240-270 degrees)	0.017	0.13	0.0394
Sector 10 (270-300 degrees)	0.0146	0.079	0.078		Sector 10 (270-300 degrees)	0.0156	0.12	0.0503
Sector 11 (300-330 degrees)	0.0272	0.183	0.048		Sector 11 (300-330 degrees)	0.0302	0.21	0.034
Sector 12 (330-360 degrees)	0.022	0.106	0.041		Sector 12 (330-360 degrees)	0.0242	0.14	0.022
<b>Average</b>	0.0669	0.263166667	0.25275		<b>Average</b>	0.066216667	0.41075	0.149891667

**Table E-6. Mattoon Land Use Surface Characterization**

<b>Seasonal Land Use Parameters by Sector</b>			
<b>Annual</b>	<b>Albedo</b>	<b>Bowen Ratio</b>	<b>Surface Roughness</b>
Sector 1 (0-30 degrees)	0.27785	0.7805	0.10565
Sector 2 (30-60 degrees)	0.289425	0.8525	0.144075
Sector 3 (60-90 degrees)	0.022625	0.126	0.0778
Sector 4 (90-120 degrees)	0.035625	0.17125	0.097
Sector 5 (120-150 degrees)	0.029375	0.12225	0.1008
Sector 6 (150-180 degrees)	0.211375	0.87375	0.774
Sector 7 (180-210 degrees)	0.203625	0.9075	0.696
Sector 8 (210-240 degrees)	0.035625	0.17125	0.097
Sector 9 (240-270 degrees)	0.024275	0.112	0.0586
Sector 10 (270-300 degrees)	0.0236	0.104	0.0662
Sector 11 (300-330 degrees)	0.041525	0.1825	0.063
Sector 12 (330-360 degrees)	0.035375	0.12625	0.032
<b>Average</b>	<b>0.102525</b>	<b>0.819979</b>	<b>0.23545208</b>

**Table E-7. Tuscola Land Use Characterization**

<b>Champaign (KCM) Fractional Land Use</b>								
<b>Sector</b>	<b>Urban (Commercial)</b>	<b>Urban (Residential)</b>	<b>Grassland</b>	<b>Cultivated Land</b>	<b>Water</b>	<b>Deciduous Forest</b>	<b>Swamp</b>	<b>Coniferous Forest</b>
Sector 1 (0-30 degrees)		0.05	0.1	0.6		0.25		
Sector 2 (30-60 degrees)		0.05	0.1	0.82		0.03		
Sector 3 (60-90 degrees)		0.05	0.05	0.87		0.03		
Sector 4 (90-120 degrees)		0.01	0.09	0.87		0.03		
Sector 5 (120-150 degrees)		0.01	0.09	0.87		0.03		
Sector 6 (150-180 degrees)		0.01	0.09	0.87		0.03		
Sector 7 (180-210 degrees)		0.01	0.09	0.87		0.03		
Sector 8 (210-240 degrees)		0.01	0.09	0.87		0.03		
Sector 9 (240-270 degrees)		0.01	0.09	0.87		0.03		
Sector 10 (270-300 degrees)		0.02	0.05	0.9		0.03		
Sector 11 (300-330 degrees)		0.05	0.1	0.84		0.01		
<b>Average</b>	<b>0</b>	<b>0.03166667</b>	<b>0.08666667</b>	<b>0.836667</b>	<b>0</b>	<b>0.045</b>	<b>0</b>	<b>0</b>

**Table E-7. Tuscola Land Use Characterization**

<b>Seasonal Land Use Parameters by Sector</b>								
<b>Winter</b>	<b>Albedo</b>	<b>Bowen Ratio</b>	<b>Surface Roughness</b>		<b>Spring</b>	<b>Albedo</b>	<b>Bowen Ratio</b>	<b>Surface Roughness</b>
Sector 1 (0-30 degrees)	0.5625	1.5	0.15601		Sector 1 (0-30 degrees)	0.139	0.445	0.298
Sector 2 (30-60 degrees)	0.5665	1.455	0.04791		Sector 2 (30-60 degrees)	0.1392	0.348	0.0837
Sector 3 (60-90 degrees)	0.0625	0.195	0.040005		Sector 3 (60-90 degrees)	0.0196	0.091	0.0575
Sector 4 (90-120 degrees)	0.0725	0.195	0.020009		Sector 4 (90-120 degrees)	0.0212	0.067	0.0395
Sector 5 (120-150 degrees)	0.0725	0.195	0.020009		Sector 5 (120-150 degrees)	0.0212	0.067	0.0395
Sector 6 (150-180 degrees)	0.0725	0.195	0.020009		Sector 6 (150-180 degrees)	0.0212	0.067	0.0395
Sector 7 (180-210 degrees)	0.0725	0.195	0.020009		Sector 7 (180-210 degrees)	0.0212	0.067	0.0395
Sector 8 (210-240 degrees)	0.0725	0.195	0.020009		Sector 8 (210-240 degrees)	0.0212	0.067	0.0395
Sector 9 (240-270 degrees)	0.0725	0.195	0.020009		Sector 9 (240-270 degrees)	0.0212	0.067	0.0395
Sector 10 (270-300 degrees)	0.052	0.15	0.025005		Sector 10 (270-300 degrees)	0.0154	0.061	0.0425
Sector 11 (300-330 degrees)	0.0825	0.24	0.03001		Sector 11 (300-330 degrees)	0.0262	0.097	0.04
Sector 12 (330-360 degrees)	0.1	0.315	0.05501		Sector 12 (330-360 degrees)	0.0332	0.147	0.065
<b>Average</b>	<b>0.15508333</b>	<b>0.41875</b>	<b>0.03950033</b>		<b>Average</b>	<b>0.04165</b>	<b>0.13258333</b>	<b>0.06864167</b>

**Table E-7. Tuscola Land Use Characterization**

<b>Seasonal Land Use Parameters by Sector</b>								
<b>Summer</b>	<b>Albedo</b>	<b>Bowen Ratio</b>	<b>Surface Roughness</b>		<b>Autumn</b>	<b>Albedo</b>	<b>Bowen Ratio</b>	<b>Surface Roughness</b>
Sector 1 (0-30 degrees)	0.176	0.555	0.48		Sector 1 (0-30 degrees)	0.167	0.87	0.256
Sector 2 (30-60 degrees)	0.1876	0.584	0.232		Sector 2 (30-60 degrees)	0.1748	0.783	0.0895
Sector 3 (60-90 degrees)	0.0206	0.149	0.069		Sector 3 (60-90 degrees)	0.0226	0.18	0.0495
Sector 4 (90-120 degrees)	0.0214	0.101	0.053		Sector 4 (90-120 degrees)	0.0234	0.14	0.0299
Sector 5 (120-150 degrees)	0.0214	0.101	0.053		Sector 5 (120-150 degrees)	0.0234	0.14	0.0299
Sector 6 (150-180 degrees)	0.0214	0.101	0.053		Sector 6 (150-180 degrees)	0.0234	0.14	0.0299
Sector 7 (180-210 degrees)	0.0214	0.101	0.053		Sector 7 (180-210 degrees)	0.0234	0.14	0.0299
Sector 8 (210-240 degrees)	0.0214	0.101	0.053		Sector 8 (210-240 degrees)	0.0234	0.14	0.0299
Sector 9 (240-270 degrees)	0.0214	0.101	0.053		Sector 9 (240-270 degrees)	0.0234	0.14	0.0299
Sector 10 (270-300 degrees)	0.0158	0.089	0.054		Sector 10 (270-300 degrees)	0.0172	0.12	0.0345
Sector 11 (300-330 degrees)	0.0272	0.183	0.048		Sector 11 (300-330 degrees)	0.0302	0.21	0.034
Sector 12 (330-360 degrees)	0.0352	0.283	0.073		Sector 12 (330-360 degrees)	0.0392	0.31	0.059
<b>Average</b>	<b>0.04923333</b>	<b>0.20408333</b>	<b>0.10616667</b>		<b>Average</b>	<b>0.04928333</b>	<b>0.27608333</b>	<b>0.05849167</b>

**Table E-7. Tuscola Land Use Surface Characterization**

<b>Seasonal Land Use Parameters by Sector</b>			
<b>Annual</b>	<b>Albedo</b>	<b>Bowen Ratio</b>	<b>Surface Roughness</b>
Sector 1 (0-30 degrees)	0.261125	0.8425	0.3225
Sector 2 (30-60 degrees)	0.267025	0.7925	0.138275
Sector 3 (60-90 degrees)	0.031325	0.15375	0.079
Sector 4 (90-120 degrees)	0.034625	0.12575	0.0406
Sector 5 (120-150 degrees)	0.034625	0.12575	0.0406
Sector 6 (150-180 degrees)	0.034625	0.12575	0.0406
Sector 7 (180-210 degrees)	0.034625	0.12575	0.0406
Sector 8 (210-240 degrees)	0.034625	0.12575	0.0406
Sector 9 (240-270 degrees)	0.034625	0.12575	0.0406
Sector 10 (270-300 degrees)	0.0251	0.105	0.049
Sector 11 (300-330 degrees)	0.041525	0.1825	0.063
Sector 12 (330-360 degrees)	0.0519	0.26375	0.113
<b>Average</b>	<b>0.0738125</b>	<b>0.7985</b>	<b>0.13629167</b>

Table E-8. Jewett Land Use Characterization

Sector	Urban (Commercial)	Urban (Residential)	Grassland	Cultivated Land	Water	Deciduous Forest	Swamp	Coniferous Forest
Sector 1 (0-30 degrees)	0	0.15	0.35	0.2	0	0.3	0	0
Sector 2 (30-60 degrees)	0	0.05	0.95	0	0	0	0	0
Sector 3 (60-90 degrees)	0	0	0.85	0	0.15	0	0	0
Sector 4 (90-120 degrees)	0	0.02	0.98	0	0	0	0	0
Sector 5 (120-150 degrees)	0	0.05	0.79	0	0.01	0.15	0	0
Sector 6 (150-180 degrees)	0	0.05	0.35	0	0	0.6	0	0
Sector 7 (180-210 degrees)	0	0.01	0.8	0	0.1	0.09	0	0
Sector 8 (210-240 degrees)	0	0.1	0.45	0	0.01	0.44	0	0
Sector 9 (240-270 degrees)	0	0.05	0.2	0	0.05	0.7	0	0
Sector 10 (270-300 degrees)	0	0.7	0.1	0	0	0.2	0	0
Sector 11 (300-330 degrees)	0	0.3	0.65	0	0	0.05	0	0
Sector 12 (330-360 degrees)	0	0.5	0.3	0	0	0.2	0	0
<b>Average</b>	<b>0</b>	<b>0.165</b>	<b>0.5641667</b>	<b>0.016666667</b>	<b>0.027</b>	<b>0.2275</b>	<b>0</b>	<b>0</b>

**Table E-8. Jewett Land Use Characterization**

Seasonal Land Use Parameters by Sector							
Winter	Albedo	Bowen Ratio	Surface Roughness	Spring	Albedo	Bowen Ratio	Surface Roughness
Sector 1 (0-30 degrees)	0.5325	1.5	0.227035	Sector 1 (0-30 degrees)	0.148	0.56	0.3985
Sector 2 (30-60 degrees)	0.5875	1.5	0.025095	Sector 2 (30-60 degrees)	0.178	0.43	0.0725
<b>Sector 3 (60-90 degrees)</b>	<b>0.54</b>	<b>1.5</b>	<b>0.0001</b>	Sector 3 (60-90 degrees)	0.171	0.355	0.042515
<b>Sector 4 (90-120 degrees)</b>	<b>0.595</b>	<b>1.5</b>	<b>0.010098</b>	Sector 4 (90-120 degrees)	0.1792	0.412	0.059
Sector 5 (120-150 degrees)	0.5685	1.5	0.10008	Sector 5 (120-150 degrees)	0.1684	0.472	0.214501
Sector 6 (150-180 degrees)	0.5275	1.5	0.325035	Sector 6 (150-180 degrees)	0.142	0.61	0.6425
<b>Sector 7 (180-210 degrees)</b>	<b>0.5485</b>	<b>1.5</b>	<b>0.05009</b>	Sector 7 (180-210 degrees)	0.1682	0.403	0.13501
<b>Sector 8 (210-240 degrees)</b>	<b>0.527</b>	<b>1.5</b>	<b>0.270046</b>	Sector 8 (210-240 degrees)	0.149	0.589	0.512501
<b>Sector 9 (240-270 degrees)</b>	<b>0.4975</b>	<b>1.5</b>	<b>0.375025</b>	Sector 9 (240-270 degrees)	0.133	0.625	0.735005
<b>Sector 10 (270-300 degrees)</b>	<b>0.405</b>	<b>1.5</b>	<b>0.45001</b>	Sector 10 (270-300 degrees)	0.14	0.88	0.555
<b>Sector 11 (300-330 degrees)</b>	<b>0.52</b>	<b>1.5</b>	<b>0.175065</b>	Sector 11 (300-330 degrees)	0.165	0.595	0.2325
<b>Sector 12 (330-360 degrees)</b>	<b>0.455</b>	<b>1.5</b>	<b>0.35003</b>	Sector 12 (330-360 degrees)	0.148	0.76	0.465
<b>Average</b>	<b>0.525333333</b>	<b>1.5</b>	<b>0.1964758</b>	<b>Average</b>	<b>0.157483333</b>	<b>0.557583333</b>	<b>0.338711</b>

**Table E-8. Jewett Land Use Characterization**

<b>Seasonal Land Use Parameters by Sector</b>								
<b>Summer</b>	<b>Albedo</b>	<b>Bowen Ratio</b>	<b>Surface Roughness</b>		<b>Autumn</b>	<b>Albedo</b>	<b>Bowen Ratio</b>	<b>Surface Roughness</b>
Sector 1 (0-30 degrees)	0.163	0.77	0.54		Sector 1 (0-30 degrees)	0.169	1.09	0.3285
Sector 2 (30-60 degrees)	0.179	0.86	0.12		Sector 2 (30-60 degrees)	0.199	1.05	0.0345
Sector 3 (60-90 degrees)	0.168	0.695	0.085015		Sector 3 (60-90 degrees)	0.191	0.865	0.008515
Sector 4 (90-120 degrees)	0.1796	0.824	0.108		Sector 4 (90-120 degrees)	0.1996	1.02	0.0198
Sector 5 (120-150 degrees)	0.1692	0.778	0.299001		Sector 5 (120-150 degrees)	0.1864	1.041	0.152901
Sector 6 (150-180 degrees)	0.143	0.56	0.84		Sector 6 (150-180 degrees)	0.151	1.05	0.5085
Sector 7 (180-210 degrees)	0.1664	0.697	0.20201		Sector 7 (180-210 degrees)	0.1866	0.92	0.08501
Sector 8 (210-240 degrees)	0.1508	0.693	0.667001		Sector 8 (210-240 degrees)	0.1622	1.091	0.406501
Sector 9 (240-270 degrees)	0.133	0.475	0.955005		Sector 9 (240-270 degrees)	0.14	1.005	0.587005
Sector 10 (270-300 degrees)	0.154	1.54	0.62		Sector 10 (270-300 degrees)	0.17	1.7	0.511
Sector 11 (300-330 degrees)	0.171	1.135	0.28		Sector 11 (300-330 degrees)	0.19	1.3	0.1965
Sector 12 (330-360 degrees)	0.158	1.3	0.54		Sector 12 (330-360 degrees)	0.174	1.5	0.413
<b>Average</b>	<b>0.16125</b>	<b>0.860583333</b>	<b>0.4380027</b>		<b>Average</b>	<b>0.176566667</b>	<b>1.136</b>	<b>0.2709777</b>

**Table E-8. Jewett Land Use Surface Characterization**

<b>Seasonal Land Use Parameters by Sector</b>			
<b>Annual</b>	<b>Albedo</b>	<b>Bowen Ratio</b>	<b>Surface Roughness</b>
Sector 1 (0-30 degrees)	0.253125	0.98	0.4485
Sector 2 (30-60 degrees)	0.285875	0.96	0.088
Sector 3 (60-90 degrees)	0.2675	0.85375	0.034015
Sector 4 (90-120 degrees)	0.28835	0.939	0.0592
Sector 5 (120-150 degrees)	0.273125	0.94775	0.216601
Sector 6 (150-180 degrees)	0.240875	0.93	0.604
Sector 7 (180-210 degrees)	0.267425	0.88	0.12301
Sector 8 (210-240 degrees)	0.24725	0.96825	0.514001
Sector 9 (240-270 degrees)	0.225875	0.90125	0.688005
Sector 10 (270-300 degrees)	0.21725	1.405	0.884
Sector 11 (300-330 degrees)	0.2615	1.1325	0.371
Sector 12 (330-360 degrees)	0.23375	1.265	0.692
<b>Average</b>	0.255158333	1.013541667	0.3935277

**Table E-9. Odessa Land Use Characterization**

Sector	Urban (Commercial)	Urban (Residential)	Grassland	Cultivated Land	Water	Deciduous Forest	Swamp	Coniferous Forest	Desert Schrubland
Sector 1 (0-30 degrees)	0	0.05		0	0	0	0	0	0.85
Sector 2 (30-60 degrees)		0.05				0			0.95
Sector 3 (60-90 degrees)		0.01				0			0.99
Sector 4 (90-120 degrees)		0.07				0			0.93
Sector 5 (120-150 degrees)		0.15				0			0.85
Sector 6 (150-180 degrees)		0.25				0			0.75
Sector 7 (180-210 degrees)		0.25				0			0.75
Sector 8 (210-240 degrees)		0.2				0			0.8
Sector 9 (240-270 degrees)		0.15							0.85
Sector 10 (270-300 degrees)		0.02							0.98
Sector 11 (300-330 degrees)		0.01				0			0.99
Sector 12 (330-360 degrees)		0.01				0			0.99
<b>Average</b>	<b>0</b>	<b>0.101666667</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0.89</b>

**Table E-9. Odessa Land Use Characterization**

<b>Seasonal Land Use Parameters by Sector</b>			
	<b>Albedo</b>	<b>Bowen Ratio</b>	<b>Surface Roughness</b>
<b>Winter</b>			
Sector 1 (0-30 degrees)	0.4	5.175	0.1525
Sector 2 (30-60 degrees)	0.445	5.775	0.1675
Sector 3 (60-90 degrees)	0.449	5.955	0.1535
Sector 4 (90-120 degrees)	0.443	5.685	0.1745
Sector 5 (120-150 degrees)	0.435	5.325	0.2025
Sector 6 (150-180 degrees)	0.425	4.875	0.2375
Sector 7 (180-210 degrees)	0.425	4.875	0.2375
Sector 8 (210-240 degrees)	0.43	5.1	0.22
Sector 9 (240-270 degrees)	0.435	5.325	0.2025
Sector 10 (270-300 degrees)	0.448	5.91	0.157
Sector 11 (300-330 degrees)	0.449	5.955	0.1535
Sector 12 (330-360 degrees)	0.449	5.955	0.1535
<b>Average</b>	<b>0.436083333</b>	<b>5.4925</b>	<b>0.184333</b>
<b>Spring</b>			
Sector 1 (0-30 degrees)	0.262	2.6	0.28
Sector 2 (30-60 degrees)	0.292	2.9	0.31
Sector 3 (60-90 degrees)	0.2984	2.98	0.302
Sector 4 (90-120 degrees)	0.2888	2.86	0.314
Sector 5 (120-150 degrees)	0.276	2.7	0.33
Sector 6 (150-180 degrees)	0.26	2.5	0.35
Sector 7 (180-210 degrees)	0.26	2.5	0.35
Sector 8 (210-240 degrees)	0.268	2.6	0.34
Sector 9 (240-270 degrees)	0.276	2.7	0.33

**Table E-9. Odessa Land Use Characterization**

<b>Seasonal Land Use Parameters by Sector</b>			
	<b>Albedo</b>	<b>Bowen Ratio</b>	<b>Surface Roughness</b>
Sector 10 (270-300 degrees)	0.2968	2.96	0.304
Sector 11 (300-330 degrees)	0.2984	2.98	0.302
Sector 12 (330-360 degrees)	0.2984	2.98	0.302
<b>Average</b>	<b>0.281233333</b>	<b>2.771666667</b>	<b>0.317833</b>
<b>Summer</b>			
Sector 1 (0-30 degrees)	0.246	3.5	0.28
Sector 2 (30-60 degrees)	0.274	3.9	0.31
Sector 3 (60-90 degrees)	0.2788	3.98	0.302
Sector 4 (90-120 degrees)	0.2716	3.86	0.314
Sector 5 (120-150 degrees)	0.262	3.7	0.33
Sector 6 (150-180 degrees)	0.25	3.5	0.35
Sector 7 (180-210 degrees)	0.25	3.5	0.35
Sector 8 (210-240 degrees)	0.256	3.6	0.34
Sector 9 (240-270 degrees)	0.262	3.7	0.33
Sector 10 (270-300 degrees)	0.2776	3.96	0.304
Sector 11 (300-330 degrees)	0.2788	3.98	0.302
Sector 12 (330-360 degrees)	0.2788	3.98	0.302
<b>Average</b>	<b>0.265466667</b>	<b>3.763333333</b>	<b>0.317833</b>
<b>Autumn</b>			
Sector 1 (0-30 degrees)	0.247	5.2	0.28
Sector 2 (30-60 degrees)	0.275	5.8	0.31
Sector 3 (60-90 degrees)	0.279	5.96	0.302
Sector 4 (90-120 degrees)	0.273	5.72	0.314
Sector 5 (120-150 degrees)	0.265	5.4	0.33

**Table E-9. Odessa Land Use Characterization**

<b>Seasonal Land Use Parameters by Sector</b>			
	<b>Albedo</b>	<b>Bowen Ratio</b>	<b>Surface Roughness</b>
Sector 6 (150-180 degrees)	0.255	5	0.35
Sector 7 (180-210 degrees)	0.255	5	0.35
Sector 8 (210-240 degrees)	0.26	5.2	0.34
Sector 9 (240-270 degrees)	0.265	5.4	0.33
Sector 10 (270-300 degrees)	0.278	5.92	0.304
Sector 11 (300-330 degrees)	0.279	5.96	0.302
Sector 12 (330-360 degrees)	0.279	5.96	0.302
<b>Average</b>	<b>0.2675</b>	<b>5.543333333</b>	<b>0.317833</b>
<b>Annual</b>			
Sector 1 (0-30 degrees)	0.28875	4.11875	0.273125
Sector 2 (30-60 degrees)	0.3215	4.59375	0.299375
Sector 3 (60-90 degrees)	0.3263	4.71875	0.269875
Sector 4 (90-120 degrees)	0.3191	4.53125	0.314125
Sector 5 (120-150 degrees)	0.3095	4.28125	0.373125
Sector 6 (150-180 degrees)	0.2975	3.96875	0.446875
Sector 7 (180-210 degrees)	0.2975	3.96875	0.446875
Sector 8 (210-240 degrees)	0.3035	4.125	0.41
Sector 9 (240-270 degrees)	0.3095	4.28125	0.373125
Sector 10 (270-300 degrees)	0.3251	4.6875	0.27725
Sector 11 (300-330 degrees)	0.3263	4.71875	0.269875
Sector 12 (330-360 degrees)	0.3263	4.71875	0.269875
<b>Average</b>	<b>0.312570833</b>	<b>4.392708</b>	<b>0.335292</b>

### E.3.2.2 Background Ambient Air Quality

Based on EPA guidance, Guidelines on Data Handling Conventions for the PM NAAQS, to determine representative background data for both PM<sub>10</sub> and PM<sub>2.5</sub> 24-hour and annual averaging period, the monitored data are averaged over a period of 3 years (2003 to 2005) (EPA, 1999). For all other pollutants and corresponding averaging periods, the highest of the second-highest values each year for a period of 3 years (2003 to 2005) is used.

#### Mattoon and Tuscola, Illinois

Mattoon is located in Coles County, Illinois and Tuscola is located in Douglas County. Both counties are part of the East Central Illinois Intrastate Air Quality Control Region (AQCR). The nearest ambient monitors to the sites and the pollutants monitored at these locations are listed below. The stations selected are in proximity to the Mattoon and Tuscola sites.

- Sulfur Dioxide - Decatur
- Nitrogen Dioxide - East St. Louis
- PM<sub>10</sub> - Peoria
- PM<sub>2.5</sub> - Champaign
- Carbon Monoxide - Peoria

Table E-10 presents the representative yet conservative background for the criteria pollutants for the proposed Mattoon and Tuscola sites.

**Table E-10. Background Concentration for the Proposed Mattoon and Tuscola Power Plant**

Pollutant	Averaging Period	Station	Second Highest Concentrations for each Year <sup>(1)</sup> (µg/m <sup>3</sup> )				
			2003	2004	2005	Average 3-yr Value	Highest Value
Sulfur Dioxide	Annual	Decatur	7.85	10.47	10.47	n/a	10.47
	24-hour	Decatur	70.67	60.2	54.99	n/a	70.67
	3-hour	Decatur	123.03	96.85	102.12	n/a	123.03
Nitrogen Dioxide	Annual	East St. Louis	30.09	30.09	28.21	n/a	30.09
	1-hour	East St. Louis	165.41	109.07	99.66	n/a	165.41
PM <sub>10</sub>	Annual	Peoria	25	22	31	26	n/a
	24-hour	Peoria	55	42	75	57.3	n/a
PM <sub>2.5</sub>	Annual	Champaign	13.1	10.4	14	12.5	n/a
	24-hour	Champaign	32.8	24.3	38.7	31.9	n/a
Carbon Monoxide	8-hour	Peoria	3,321.05	3,435.57	3,457.93	n/a	3,457.93
	1-hour	Peoria	5,611.43	4,466.24	5,264.66	n/a	5,611.43

n/a = not applicable.

Source: Illinois Annual Air Quality Reports, 2003, 2004, 2005.

## Jewett, Texas

Jewett is located in northwestern Leon County, Texas and is part of the Austin-Waco Intrastate Air Quality Control Region (AQCR 212). The nearest ambient monitors to the site and the pollutants monitored at these locations are listed below. The stations selected are in proximity to the Jewett site.

- Sulfur Dioxide - Dallas (Hinton St)
- Nitrogen Dioxide - Dallas North (Nuestra Drive)
- PM<sub>10</sub> - Dallas (South Akard)
- PM<sub>2.5</sub> - Houston (Aldine)
- Carbon Monoxide - Fort Worth

Table E-11 presents the representative yet conservative background for these criteria pollutants for the proposed Jewett site.

**Table E-11. Background Concentration for the Proposed Jewett Power Plant**

Pollutant	Averaging Period	Station	Second Highest Concentrations for each Year ( $\mu\text{g}/\text{m}^3$ )				
			2003	2004	2005	Average 3-yr Value	Highest Value
Sulfur Dioxide	Annual	Dallas Hinton St.	2.62	2.62	2.62	n/a	2.62
	24-hour	Dallas Hinton St.	10.47	13.09	10.47	n/a	13.09
	3-hour	Dallas Hinton St.	23.56	28.79	34.03	n/a	34.03
Nitrogen Dioxide	Annual	Dallas North	26.34	22.58	24.46	n/a	26.34
	1-hour	Dallas North	122.29	101.6	112.88	n/a	122.29
PM10	Annual	Dallas South Akard	28	23	27	26.3	n/a
	24-hour	Dallas South Akard	63	55	47	55.0	n/a
PM2.5	Annual	Houston Aldine	13.8	13.5	13.8	13.7	n/a
	24-hour	Houston Aldine	31	30	27	29.3	n/a
Carbon Monoxide	8-hour	Fort Worth	1,832.30	1,946.82	1,717.79	n/a	1,946.82
	1-hour	Fort Worth	4,008.17	3,321.05	2,977.49	n/a	4,008.17

n/a = not applicable.

Source: TCEQ, 2005 and EPA AirDatabase.

## Odessa, Texas

Odessa is located in Ector County, Texas and is part of the Midland-Odessa-San Angelo Intrastate Air Quality Control Region (AQCR 218). The nearest ambient monitors to the site and the pollutants monitored at these locations are listed below.

- Sulfur Dioxide - El Paso, TX
- Nitrogen Dioxide - Hobbs, NM
- PM<sub>10</sub> - Hobbs, NM
- PM<sub>2.5</sub> - Odessa, TX
- Carbon Monoxide - El Paso, TX

Table E-12 presents the representative yet conservative background for these criteria pollutants for the proposed Odessa site.

**Table E-12. Background Concentration for the Proposed Odessa Power Plant**

Pollutant	Averaging Period	Station	Second Highest Concentrations for each Year <sup>(1)</sup> (µg/m <sup>3</sup> )				
			2003	2004	2005	Average 3-yr Value	Highest Value
Sulfur Dioxide	Annual	El Paso, TX.	5.24	2.62	2.62	n/a	5.24
	24-hour	El Paso, TX.	10.47	7.85	13.09	n/a	13.09
	3-hour	El Paso, TX.	52.35	34.03	31.41	n/a	52.35
Nitrogen Dioxide	Annual	Hobbs, NM	ND	15.05	13.17	n/a	15.05
	1-hour	Hobbs, NM	ND	77.14	92.19	n/a	92.19
PM10	Annual	Hobbs, NM	26	15	13	18	n/a
	24-hour	Hobbs, NM	88	48	18	51.3	n/a
PM2.5	Annual	Odessa, TX	7.8	7.6	7.7	7.7	n/a
	24-hour	Odessa, TX	18	22	21	20.3	n/a
Carbon Monoxide	8-hour	El Paso, TX.	3,902.01	3,323.94	3,757.49	n/a	3,902.01
	1-hour	El Paso, TX.	7,225.95	6,792.39	6,069.80	n/a	7,225.95

ND = no data.

n/a = not applicable.

Source: TCEQ, 2005 and EPA AirDatabase.

### E.3.2.3 Terrain Input Data

USGS 7.5-minute DEM data were used with the AERMOD terrain preprocessing model (AERMAP) to determine appropriate site terrain elevations in accordance with EPA's Guideline on Air Quality Models' (GAQM) recommendations for AERMOD. According to the GAQM, *flat* terrain is terrain equal to the elevation of the stack base, *simple* terrain is terrain lower than the height of the stack top, and *complex* terrain is terrain exceeding the height of the stack being modeled. Terrain input data for the proposed power plant sites are provided in Table E-13.

**Table E-13. 7.5 Minute DEM Terrain Input Data for Proposed Power Plant Sites**

Mattoon, IL <sup>1</sup>	Tuscola, IL <sup>1</sup>	Jewett, TX <sup>2</sup>	Odessa, TX <sup>3</sup>
Cadwell	Ivesdale	Teague South	Red Lakes
Arthur	Tolono	Dew	Douro
Arcola	Villa Grove NW	Lanely	Odessa SW
Sullivan	Atwood	Farrar	Metz
Cooks Mill	Tuscola	Donie	Penwell
Humboldt	Villa Grove	Buffalo	Clark Brothers Ranch
Windsor	Arthur	Round Prairie	Penwell SW
Mattoon West	Arcola	Jewett	Penwell SE
	Hindsburg	Robbins	Doodle Bug Well

<sup>1</sup> Portions of the modeling terrain for which 7.5 minute DEMs were not found were covered using Decatur 1-degree DEM.

<sup>2</sup> Portions of the modeling terrain for which 7.5 minute DEMs were not found were covered using "Waco" 1-degree DEM.

<sup>3</sup> Portions of the modeling terrain for which 7.5 minute DEMs were not found were covered using "Pecos" 1-degree DEM.

### E.3.2.4 Receptor Grid

AERMOD requires receptor data consisting of location coordinates and ground-level elevations (see Table E-14). The discrete Cartesian and discrete sensitive receptors are based on the following tier and spacing distances in accordance with IEPA, TCEQ, and USEPA guidelines:

**Table E-14. Receptor Grid Tier and Spacing Distance**

Mattoon, IL	Tuscola, IL	Jewett, TX	Odessa, TX
<ul style="list-style-type: none"> <li>• Refined receptor grid consists of 10,730 discrete points beyond the fence line</li> <li>• Fence line receptors at 50 meter spacing</li> <li>• Near-field Cartesian receptors from source location (center of the site) and extending out to 3,500 meters at 100 meter spacing (can also be described as extending from fence line to approximately 2,800 meters beyond)</li> <li>• Intermediate-field Cartesian receptors between 3,500 meters and extending out to 7,500 meters at 250 meter spacing</li> <li>• Far-field Cartesian receptors from 7,500 meters and extending out to 15,000 meters at 500 meter spacing</li> <li>• 17 sensitive receptors (schools, hospitals, etc.) modeled as discrete Cartesian receptors</li> <li>• Additional discrete Cartesian receptors to ensure full coverage of the sensitive receptor map domain</li> </ul>	<ul style="list-style-type: none"> <li>• Refined receptor grid consists of 11,588 discrete points beyond the fence line</li> <li>• Fence line receptors at 50 meter spacing</li> <li>• Near-field Cartesian receptors from source location (center of the site) and extending out to 3,500 meters at 100 meter spacing (can also be described as extending from fence line to approximately 3,000 meters beyond)</li> <li>• Intermediate-field Cartesian receptors between 4,000 meters and extending out to 7,000 meters at 250 meter spacing</li> <li>• Far-field Cartesian receptors from 7,000 meters and extending out to 15,000 meters at 500 meter spacing</li> <li>• 20 sensitive receptors (schools, hospitals, etc.) modeled as discrete Cartesian receptors</li> <li>• Additional discrete Cartesian receptors to ensure full coverage of the sensitive receptor map domain</li> </ul>	<ul style="list-style-type: none"> <li>• Refined receptor grid consists of 8,147 discrete points beyond the fence line</li> <li>• Fence line receptors at 50 meter spacing</li> <li>• Near-field Cartesian receptors from source location (center of the site) and extending out to 4,000 meters at 100 meter spacing (can also be described as extending from fence line to approximately 3,000 meters beyond)</li> <li>• Intermediate-field Cartesian receptors between 4,000 meters and extending out to 8,000 meters at 500 meter spacing</li> <li>• Far-field Cartesian receptors from 8,000 meters and extending out to 18,000 meters at 1,000 meter spacing</li> <li>• 5 sensitive receptors (schools, hospitals, etc.) modeled as discrete Cartesian receptors</li> <li>• Additional discrete Cartesian receptors to ensure full coverage of the sensitive receptor map domain</li> </ul>	<ul style="list-style-type: none"> <li>• Refined receptor grid consists of 8,147 discrete points beyond the fence line</li> <li>• Fence line receptors at 50 meter spacing</li> <li>• Near-field Cartesian receptors from source location (center of the site) and extending out to 3,500 meters at 100 meter spacing (can also be described as extending from fence line to approximately 3,000 meters beyond)</li> <li>• Intermediate-field Cartesian receptors between 3,500 meters and extending out to 7,500 meters at 500 meter spacing</li> <li>• Far-field Cartesian receptors from 7,500 meters and extending out to 18,000 meters at 1,000 meter spacing</li> <li>• 4 sensitive receptors (schools, hospitals, etc.) modeled as discrete Cartesian receptors</li> <li>• Additional discrete Cartesian receptors to ensure full coverage of the sensitive receptor map domain</li> </ul>

### E.3.3 AERMOD MODELING RESULTS

The AERMOD results for each site are provided below.

**Mattoon, Illinois**

The AERMOD results for the proposed Mattoon Power Plant project are provided in Table E-15.

**Table E-15. Predicted Maximum Concentration Increases from Proposed Mattoon Power Plant ( $\mu\text{g}/\text{m}^3$ )<sup>1</sup>**

Pollutant	Averaging Period	Maximum Annual Concentration Increase	Maximum Short-Term Concentration Increase
SO <sub>2</sub> (Normal Operating Scenario) <sup>2</sup>	3-hour	--	0.7172
	24-hour	--	0.2625
	Annual	0.18	--
SO <sub>2</sub> (Plant Upset Scenario) <sup>3, 4, 5</sup>	3-hour	--	511.82
	24-hour	--	88.00
	Annual	0.18	--
NO <sub>2</sub> <sup>6</sup>	Annual	0.26	--
PM <sub>10</sub>	24-hour	--	0.52
	Annual	0.04	--
PM <sub>2.5</sub> <sup>7</sup>	24-hour	--	0.52
	Annual	0.04	--
CO	1-hour	--	11.33
	8-hour	--	5.01

<sup>1</sup> Because the FutureGen Project would be a R&D project, DOE assumes that the maximum plant availability would be 85 percent.

<sup>2</sup> The normal operating scenario is based on steady-state emissions and is a period when the plant is operating without flaring, sudden restarts, or other upset conditions.

<sup>3</sup> The plant upset scenario is based on unplanned restart emissions. Most of the unplanned restart emissions would be SO<sub>2</sub>. NO<sub>2</sub> and CO emissions would be higher during normal operation. There are no PM<sub>10</sub>, PM<sub>2.5</sub> emissions during plant upset scenarios. See Table E-4.

<sup>4</sup> The 3-hr SO<sub>2</sub> concentration is based on the 85<sup>th</sup> maximum concentration reading (out of 14,600 readings) of 5-yr meteorological data. The probability of concentration greater than 511.82  $\mu\text{g}/\text{m}^3$  during the 3-hr averaging period is less than 0.23 percent.

<sup>5</sup> The 24-hr SO<sub>2</sub> concentration is based on the 1<sup>st</sup> maximum concentration reading (out of 1,825 readings) of 5-yr meteorological data. The probability of concentrations greater than 88.00  $\mu\text{g}/\text{m}^3$  during the 24-hr averaging period is zero.

<sup>6</sup> There are no short-term NAAQS for NO<sub>2</sub>.

<sup>7</sup> PM<sub>2.5</sub> emissions are assumed to be the same as PM<sub>10</sub>.

$\mu\text{g}/\text{m}^3$  = micrograms per cubic meter.

Source: FG Alliance, 2007 and EPA, 1990.

## Tuscola, Illinois

The AERMOD results for the proposed Tuscola Power Plant project are provided in Table E-16.

**Table E-16. Predicted Maximum Concentration Increases from Proposed Tuscola Power Plant ( $\mu\text{g}/\text{m}^3$ )<sup>1</sup>**

Pollutant	Averaging Period	Maximum Annual Concentration Increase	Maximum Short-Term Concentration Increase
SO <sub>2</sub> (Normal Operating Scenario) <sup>2</sup>	3-hour	--	0.5355
	24-hour	--	0.1967
	Annual	0.05	--
SO <sub>2</sub> (Plant Upset Scenario) <sup>3, 4, 5</sup>	3-hour	--	511.96
	24-hour	--	67.00
	Annual	0.05	--
NO <sub>2</sub> <sup>6</sup>	Annual	0.07	--
PM <sub>10</sub>	24-hour	--	0.39
	Annual	0.01	--
PM <sub>2.5</sub> <sup>7</sup>	24-hour	--	0.39
	Annual	0.01	--
CO	1-hour	--	9.47
	8-hour	--	4.73

<sup>1</sup> Because the FutureGen Project would be a R&D project, DOE assumes that the maximum plant availability would be 85 percent.

<sup>2</sup> The normal operating scenario is based on steady-state emissions and is a period when the plant is operating without flaring, sudden restarts, or other upset conditions.

<sup>3</sup> The plant upset scenario is based on unplanned restart emissions. Most of the unplanned restart emissions would be SO<sub>2</sub>. NO<sub>2</sub> and CO emissions would be higher during normal operation. There are no PM<sub>10</sub>, PM<sub>2.5</sub> emissions during plant upset scenarios. See Table E-4.

<sup>4</sup> The 3-hr SO<sub>2</sub> concentration is based on the 82<sup>nd</sup> maximum concentration reading (out of 14,600 readings) of 5-yr meteorological data. The probability of concentrations greater than 511.94  $\mu\text{g}/\text{m}^3$  during the 3-hr averaging period is less than 0.22 percent.

<sup>5</sup> The 24-hr SO<sub>2</sub> concentration is based on the 1<sup>st</sup> maximum concentration reading (out of 1,825 readings) of 5-yr meteorological data. The probability of concentrations greater than 67.00  $\mu\text{g}/\text{m}^3$  during the 24-hr averaging period is zero.

<sup>6</sup> There are no short-term NAAQS for NO<sub>2</sub>.

<sup>7</sup> PM<sub>2.5</sub> emissions are assumed to be the same as PM<sub>10</sub>.

$\mu\text{g}/\text{m}^3$  = micrograms per cubic meter.

Source: FG Alliance, 2007 and EPA, 1990.

**Jewett, Texas**

The AERMOD results for the proposed Jewett Power Plant project are provided in Table E-17.

**Table E-17. Predicted Maximum Concentration Increases from Proposed Jewett Power Plant ( $\mu\text{g}/\text{m}^3$ )<sup>1</sup>**

<b>Pollutant</b>	<b>Averaging Period</b>	<b>Maximum Annual Concentration Increase</b>	<b>Maximum Short-Term Concentration Increase</b>
SO <sub>2</sub> (Normal Operating Scenario) <sup>2</sup>	3-hour	--	0.8195
	24-hour	--	0.4152
	Annual	0.48	--
SO <sub>2</sub> (Plant Upset Scenario) <sup>3, 4, 5</sup>	3-hour	--	511.91
	24-hour	--	89.50
	Annual	0.48	--
NO <sub>2</sub> <sup>6</sup>	Annual	0.67	--
PM <sub>10</sub>	24-hour	--	0.83
	Annual	0.10	--
PM <sub>2.5</sub> <sup>7</sup>	24-hour	--	0.83
	Annual	0.10	--
CO	1-hour	--	10.45
	8-hour	--	7.88

<sup>1</sup> Because the FutureGen Project would be a R&D project, DOE assumes that the maximum plant availability would be 85 percent.

<sup>2</sup> The normal operating scenario is based on steady-state emissions and is a period when the plant is operating without flaring, sudden restarts, or other upset conditions.

<sup>3</sup> The plant upset scenario is based on unplanned restart emissions. Most of the unplanned restart emissions would be SO<sub>2</sub>. NO<sub>2</sub> and CO emissions would be higher during normal operation. There are no PM<sub>10</sub>, PM<sub>2.5</sub> emissions during plant upset scenarios. See Table E-4.

<sup>4</sup> The 3-hr SO<sub>2</sub> concentration is based on the 618<sup>th</sup> maximum concentration reading (out of 14,600 readings) of 5-yr meteorological data. The probability of concentration greater than 511.91  $\mu\text{g}/\text{m}^3$  during the 3-hr averaging period is less than 1.66 percent.

<sup>5</sup> The 24-hr SO<sub>2</sub> concentration is based on the 88<sup>th</sup> maximum concentration reading (out of 1,825 readings) of 5-yr modeling data. The probability of concentrations greater than 89.00  $\mu\text{g}/\text{m}^3$  during the 24-hr averaging period is 0.20 percent.

<sup>6</sup> There are no short-term NAAQS for NO<sub>2</sub>.

<sup>7</sup> PM<sub>2.5</sub> emissions are assumed to be the same as PM<sub>10</sub>.  
 $\mu\text{g}/\text{m}^3$  = micrograms per cubic meter.

Source: FG Alliance, 2007 and EPA, 1990.

**Odessa, Texas**

The AERMOD results for the proposed Odessa Power Plant project are provided in Table E-18.

**Table E-18. Predicted Maximum Concentration Increases from Proposed Odessa Power Plant ( $\mu\text{g}/\text{m}^3$ )<sup>1</sup>**

Pollutant	Averaging Period	Maximum Annual Concentration Increase	Maximum Short-Term Concentration Increase
SO <sub>2</sub> (Normal Operating Scenario) <sup>2</sup>	3-hour	--	0.5425
	24-hour	--	0.1884
	Annual	0.25	--
SO <sub>2</sub> (Plant Upset Scenario) <sup>3, 4, 5</sup>	3-hour	--	511.98
	24-hour	--	73.00
	Annual	0.25	--
NO <sub>2</sub> <sup>6</sup>	Annual	0.35	--
PM <sub>10</sub>	24-hour	--	0.38
	Annual	0.05	--
PM <sub>2.5</sub> <sup>7</sup>	24-hour	--	0.38
	Annual	0.05	--
CO	1-hour	--	8.42
	8-hour	--	4.85

<sup>1</sup> Because the FutureGen Project would be a R&D project, DOE assumes that the maximum plant availability would be 85 percent.

<sup>2</sup> The normal operating scenario is based on steady-state emissions and is a period when the plant is operating without flaring, sudden restarts, or other upset conditions.

<sup>3</sup> The plant upset scenario is based on unplanned restart emissions. Most of the unplanned restart emissions would be SO<sub>2</sub>. NO<sub>2</sub> and CO emissions would be higher during normal operation. There are no PM<sub>10</sub>, PM<sub>2.5</sub> emissions during plant upset scenarios. See Table E-4.

<sup>4</sup> The 3-hr SO<sub>2</sub> is based on the 33<sup>rd</sup> maximum concentration reading (out of 14,600 readings) of 5-yr meteorological data. The probability of concentration greater than 511.98  $\mu\text{g}/\text{m}^3$  during the 3-hr averaging period is less than 0.09 percent.

<sup>5</sup> The 24-hr SO<sub>2</sub> is based on the 1<sup>st</sup> maximum concentration reading (out of 1,825 readings) of 5-yr modeling data. The probability of concentrations greater than 73.00  $\mu\text{g}/\text{m}^3$  during the 24-hr averaging period is zero.

<sup>6</sup> There are no short-term NAAQS for NO<sub>2</sub>.

<sup>7</sup> PM<sub>2.5</sub> emissions are assumed to be the same as PM<sub>10</sub>.

$\mu\text{g}/\text{m}^3$  = micrograms per cubic meter.

Source: FG Alliance, 2007 and EPA, 1990.

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## APPENDIX F

### ALOHA SIMULATION OF AQUEOUS AMMONIA SPILLS

The Areal Locations of Hazardous Atmospheres (ALOHA), version 5.4, model was used to simulate the volatilization and air dispersion of 19 percent aqueous ammonia (NH<sub>3</sub>) spills. ALOHA was jointly developed by the National Oceanic and Atmospheric Administration (NOAA) and the U.S. Environmental Protection Agency. The U.S. Department of Energy's Office of Environmental, Safety, and Health have designated ALOHA as one of six toolbox codes for safety analysis (DOE, 2004). The ALOHA model provides all of the thermodynamic parameter values needed to simulate spills of both anhydrous NH<sub>3</sub> and aqueous NH<sub>3</sub> solutions up to 30 percent. The user enters site specific information concerning the spill volume, the type of spill, and meteorological information.

Three types of 19 percent aqueous NH<sub>3</sub> spills were simulated: a 400-pound (181-kilograms) leak from a valve, an uncontained 23.1-ton (21-metric ton) (6,000-gallon [22,712-liters]) spill from a delivery truck, and a 52-ton (47-metric ton) spill from a storage tank that is surrounded by a 3-foot (0.9-meter) high berm. Each spill is simulated in the ALOHA model as a puddle-evaporation scenario in which the area and mass of aqueous NH<sub>3</sub> are specified. The leaking valve scenario assumes a puddle thickness of 0.4 inch (1 centimeter); the uncontained truck spill assumes a puddle thickness of 4 inches (10 centimeters); and the contained tank spill assumes a puddle thickness of a 3-foot (0.9-meter) berm. A summary of the parameter values used to model the NH<sub>3</sub> spills is given in Table F-1.

**Table F-1. Summary of ALOHA Information Used With the 19 Percent Aqueous NH<sub>3</sub> Spill Simulations**

	Leaking Valve Scenario	Truck Spill Scenario	Containment Spill Scenario
<b>Description</b>	400-pound (181-kilogram) spill	23-ton (21-metric ton) spill	52-ton (47-metric tons) spill
<b>Source type</b>	Evaporating puddle	Evaporating puddle	Evaporating puddle
<b>Source dimensions (length x width)</b>	14.5 feet x 14.5feet (4.43meter x 4.43meter)	49.5 feet x 49.5 feet (15.1 meter x 15.1 meter)	24.5 feet x 24.5 feet (7.47 meter x 7.47 meter)
<b>Source area (square feet [square meters])</b>	211 (19.6)	2,454 (228)	601 (55.8)
<b>Puddle Depth (inch [centimeter])</b>	0.4 (1)	4 (10)	36 (92)
<b>Terrain option</b>	Simple terrain	Simple terrain	Simple terrain
<b>Urban/rural option</b>	Open country	Open country	Open country
<b>Cloud cover</b>	0	0	0
<b>Humidity</b>	50 percent	50 percent	50 percent
<b>Highest daily maximum temperatures</b>	97, 101,104, and 106 °F (36, 38, 40 and 41 °C)	97, 101,104, and 106 °F (36, 38, 40 and 41 °C)	97, 101,104, and 106 °F (36, 38, 40 and 41 °C)
<b>Stability class</b>	Pasquill F	Pasquill F	Pasquill F
<b>Wind speed (feet/second [meter/second])</b>	5 (1.5)	5 (1.5)	5 (1.5)

°F = degree Fahrenheit; °C = degree Celsius

## F.1 WORST-CASE METEOROLOGICAL CONDITIONS

As specified in 40 CFR Part 68.22 for off-site consequence-analysis parameter values (EPA, 1999), the worst-case release analyses are to be based on a wind speed of 5 feet/second (1.5 meters/second), an F atmospheric stability class, and the highest daily maximum temperature in the previous three years. The maximum temperatures are: Tuscola-97°F (36°C), Mattoon-101°F (38°C), Jewett-104°F (40°C), and Odessa-106°F (41°C). The maximum radii to nine different predicted NH<sub>3</sub> concentration levels, down wind of the spills, are predicted for each of the three spill scenarios and for each of the four sites. The nine NH<sub>3</sub> concentration levels are: 30; 110; 160; 220; 390; 550; 1,100; 1,600; and 2,700 parts per million volume (ppmv). These concentrations represent various health-effects criteria levels used in the risk assessment for NH<sub>3</sub> spills (EPA, 2007) (see Section 4.17 for explanation of AEGLs). ALOHA predicts the maximum radius at which each of these concentrations can travel down wind of the spill within the first hour after the spill occurs. Table F-2 presents the predicted maximum radii for the worst-case analysis of the Jewett Site; Table F-3 presents the results for the worst-case analysis at the Tuscola Site; Table F-4 presents the results for the worst-case analysis at the Odessa Site; and, Table F-5 presents the results for the worst-case analysis at the Mattoon Site.

**Table F-2. Predicted Maximum Radii for Jewett Site Worst-Case Analysis<sup>1</sup>**

Maximum NH <sub>3</sub> (ppmv)	400-pound (181-kilogram) Release <sup>2</sup> (feet [meters])	23-ton (21-metric ton) Release <sup>3</sup> (feet [meters])	52-ton (47-metric ton) Release <sup>4</sup> (feet [meters])
30	2,858 (871)	15,092 (4,600)	8,530 (2,600)
110	1,545 (471)	6,890 (2,100)	3,937 (1,200)
160	1,296 (395)	5,577 (1,700)	3,140 (957)
220	1,122 (342)	4,921 (1,500)	2,618 (798)
390	879 (268)	3,608 (1,100)	1,900 (579)
550	755 (230)	2,907 (886)	1,572 (479)
1,100	548 (167)	1,969 (600)	1,079 (329)
1,600	456 (139)	1,591 (485)	879 (268)
2,700	344 (105)	1,178 (359)	659 (201)

<sup>1</sup> ALOHA predicted maximum radii to specific NH<sub>3</sub> concentrations due to releases from an evaporating puddle (evaporating puddle, ground, and air at 104°F (40°C) at Jewett, TX, for the worst-case meteorological conditions of 4.9 feet/second (1.5 meters/second) wind speed and Pasquill stability class F.

<sup>2</sup> Initial emission rate of 3.84 kg/min.

<sup>3</sup> Initial emission rate of 41.0 kg/min.

<sup>4</sup> Initial emission rate of 13.3 kg/min.

ppmv = parts per million volume.

**Table F-3. Predicted Maximum Radii for Tuscola Site Worst-Case Analysis<sup>1</sup>**

Maximum NH <sub>3</sub> (ppmv)	400-pound (181-kilogram) Release <sup>2</sup> (feet [meters])	23-ton (21-metric ton) Release <sup>3</sup> (feet [meters])	52-ton (47-metric ton) Release <sup>4</sup> (feet [meters])
30	2,687 (819)	14,108 (4,300)	7,546 (2,300)
110	1,447 (441)	6,234 (1,900)	3,281 (1,000)
160	1,211 (369)	5,249 (1,600)	2,740 (835)
220	1,050 (320)	4,265 (1,300)	2,287 (697)
390	817 (249)	3,159 (963)	1,667 (508)
550	702 (214)	2,602 (793)	1,381 (421)
1,100	505 (154)	1,752 (534)	948 (289)
1,600	417 (127)	1,414 (431)	771 (235)
2,700	315 (96)	1,043 (318)	577 (176)

<sup>1</sup> ALOHA predicted maximum radii to specific NH<sub>3</sub> concentrations due to releases from an evaporating puddle (evaporating puddle, ground, and air at 97 °F (36 °C) at Tuscola, IL, for the worst-case meteorological conditions of 4.9 feet/second (1.5 meters/second) wind speed and Pasquill stability class F.

<sup>2</sup> Initial emission rate of 3.24 kg/min.

<sup>3</sup> Initial emission rate of 33.4 kg/min.

<sup>4</sup> Initial emission rate of 10.5 kg/min.

ppmv = parts per million volume.

**Table F-4. Predicted Maximum Radii for Odessa Site Worst-Case Analysis<sup>1</sup>**

Maximum NH <sub>3</sub> (ppmv)	400-pound (181-kilogram) Release <sup>2</sup> (feet [meters])	23-ton (21-metric ton) Release <sup>3</sup> (feet [meters])	52-ton (47-metric ton) Release <sup>4</sup> (feet [meters])
30	2,950 (899)	15,584 (4,750)	9,186 (2,800)
110	1,595 (486)	7,874 (2,400)	4,265 (1,300)
160	1,339 (408)	6,562 (2,000)	3,281 (1,000)
220	1,155 (352)	5,577 (1,700)	2,756 (840)
390	906 (276)	3,937 (1,200)	1,998 (609)
550	778 (237)	3,281 (1,000)	1,654 (504)
1,100	568 (173)	2,277 (694)	1,132 (345)
1,600	472 (144)	1,841 (561)	925 (282)
2,700	361 (110)	1,362 (415)	692 (211)

<sup>1</sup> ALOHA predicted maximum radii to specific NH<sub>3</sub> concentrations due to releases from an evaporating puddle (evaporating puddle, ground, and air at 106 °F (41 °C) at Odessa, TX, for the worst-case meteorological conditions of 4.9 feet/second (1.5 meters/second) wind speed and Pasquill stability class F.

<sup>2</sup> Initial emission rate of 4.05 kg/min.

<sup>3</sup> Initial emission rate of 52.6 kg/min.

<sup>4</sup> Initial emission rate of 14.3 kg/min.

ppmv = parts per million volume.

**Table F-5. Predicted Maximum Radii for Mattoon Site Worst-Case Analysis<sup>1</sup>**

Maximum NH <sub>3</sub> (ppmv)	400-pound (181-kilograms) Release <sup>2</sup> (feet [meters])	23-tons (21-metric tons) Release <sup>3</sup> (feet [meters])	52-tons (47-metric tons) Release <sup>4</sup> (feet [meters])
30	2,805 (855)	14,764 (4,500)	8,202 (2,500)
110	1,513 (461)	6,890 (2,100)	3,609 (1,100)
160	1,266 (386)	5,577 (1,700)	2,969 (905)
220	1,096 (334)	4,593 (1,400)	2,477 (755)
390	856 (261)	3,281 (1,000)	1,798 (548)
550	735 (224)	2,785 (849)	1,490 (454)
1,100	532 (162)	1,880 (573)	1,024 (312)
1,600	443 (135)	1,519 (463)	833 (254)
2,700	335 (102)	1,125 (343)	627 (191)

<sup>1</sup> ALOHA predicted maximum radii to specific NH<sub>3</sub> concentrations due to releases from an evaporating puddle (evaporating puddle, ground, and air at 101 °F (38 °C) at Mattoon, IL, for the worst-case meteorological conditions of 4.9 feet/second (1.5 meters/second) wind speed and Pasquill stability class F.

<sup>2</sup> Initial emission rate of 3.58 kg/min.

<sup>3</sup> Initial emission rate of 37.5 kg/min.

<sup>4</sup> Initial emission rate of 11.9 kg/min.

ppmv = parts per million volume.

The highest predicted NH<sub>3</sub> concentrations are associated with the 23.1-ton (21-metric ton) truck spill scenario. The 52-ton (47-metric ton) tank spill scenario involves a much larger volume of aqueous NH<sub>3</sub>, but the truck spill has the largest spill area (2,454 square feet (228 square meters) versus 601 square feet (55.8 square meters) for the tank spill). The larger the spill area, the greater the mass of NH<sub>3</sub> that is available to evaporate per unit time.

When comparing the same spill scenario for all sites, the only difference used in the simulations was the maximum ambient temperature. The Tuscola site was simulated with a maximum daily temperature of 97°F (36°C) (see Table F-3) and the Odessa site was simulated with a maximum daily temperature of 106°F (41°C) (see Table F-4). There is approximately a 5 percent difference in the travel distance for the NH<sub>3</sub> plume between sites for the same spill scenario. There is little difference among the four sites when comparing the worst-case meteorological conditions. The biggest factor is the type of spill scenario, and the uncontained truck-spill scenario results in the highest potential NH<sub>3</sub> exposures.

## F.2 ALOHA SENSITIVITY ANALYSIS FOR 7 DIFFERENT WIND/STABILITY CONDITIONS FOR THE TRUCK SPILL SCENARIO

The effect of different meteorological conditions on the predicted air concentrations of NH<sub>3</sub> resulting from the 23.1-ton (21-metric ton) truck spill was examined. The results presented in Tables F-2 to F-5 were based on the conservative assumption of calm wind conditions at the four sites, defined as a wind speed of 4.9 feet/second (1.5 meters/second) and a Pasquill stability class F. Class F stability corresponds to very stable atmospheric conditions and limited vertical mixing of the NH<sub>3</sub> plume. Hence, the NH<sub>3</sub> plume can travel down wind much further at higher concentrations compared to NH<sub>3</sub> plumes that are subject to greater vertical mixing.

The effect of meteorological conditions on predicted NH<sub>3</sub> concentrations is presented for the 23.1-ton (21-metric ton) truck spill scenario in Table F-6. The Jewett site was selected as a representative site, but the simulation results apply to all four sites. Data for the seven wind speed/stability classes were obtained from the Jewett wind-rose data set in the EIS. The model results in Table F-6 show that for the F/1.5 stability class/wind-condition, elevated NH<sub>3</sub> concentrations extend at least three times further from the source than for the D/8 stability class. The A/2 stability class simulation shows the greatest mixing and the shortest travel distance for elevated NH<sub>3</sub> concentrations. The A stability-class category indicates very unstable air and substantial vertical mixing of the NH<sub>3</sub> plume within the upper air stream. The more unstable the air, the more quickly the NH<sub>3</sub> plume becomes diluted.

**Table F-6. Effect of Meteorological Conditions on Predicted NH<sub>3</sub> Concentrations for the 23.1-Ton (21-metric ton) Truck Spill Scenario<sup>1</sup>**

Maximum NH <sub>3</sub> (ppmv)	F	A	A	B	B	C	D
	1.5 (20.8 percent) <sup>2</sup>	1 (6.5 percent)	2 (8.7 percent)	3 (27.9 percent)	4 (14.3 percent)	6 (13.4 percent)	8 (8.4 percent)
<b>30</b>	15,092 feet (4,600 meters)	1,289 feet (393 meters)	1,240 feet (378 meters)	1,834 feet (559 meters)	2,024 feet (617 meters)	3,068 feet (935 meters)	5,249 feet (1,600 meters)
<b>110</b>	6,890 (2,100)	669 (204)	643 (196)	948 (289)	1,053 (321)	1,568 (478)	2,493 (760)
<b>160</b>	5,577 (1,700)	554 (169)	528 (161)	784 (239)	873 (266)	1,289 (393)	2,001 (610)
<b>220</b>	4,921 (1,500)	469 (143)	453 (138)	666 (203)	741 (226)	1,096 (334)	1,667 (508)
<b>390</b>	3,608 (1,100)	351 (107)	335 (102)	499 (152)	551 (168)	810 (247)	1,201 (366)
<b>550</b>	2,907 (886)	292 (89)	279 (85)	417 (127)	463 (141)	679 (207)	988 (301)
<b>1,100</b>	1,969 (600)	200 (61)	194 (59)	289 (88)	322 (98)	469 (143)	666 (203)
<b>1,600</b>	1,591 (485)	164 (50)	154 (47)	230 (70)	262 (80)	381 (116)	535 (163)
<b>2,700</b>	1,178 (359)	-	-	171 (52)	194 (59)	282 (86)	390 (119)

<sup>1</sup> ALOHA predicted maximum radii to specific NH<sub>3</sub> concentrations due to releases from ground puddles (Puddle, ground, and air at 104°F [40°C]) for the 23.1 ton (21 metric ton) release at Jewett, TX. Wind speed/stability-class are obtained from Jewett wind rose data.

<sup>2</sup> Percent of time in stability class.

Table F-7 shows how the truck spill scenario varies between the four sites under the worse-case F/1.5 wind condition. As discussed, there is approximately a 5 percent difference in the predicted characteristics of the NH<sub>3</sub> plume between sites. These differences are only due to the different maximum daily temperatures at each site. Table F-8 compares the predicted NH<sub>3</sub>-concentration radii under the second most conservative set of meteorological conditions at each site. At each site, the lengths of the ammonia-concentration radii are almost one-third the lengths of the radii for the worst-case, F stability class condition. There is little different among sites, but large variations at each site for different meteorological conditions and different spill scenarios.

**Table F-7. Truck Spill Scenario Across Four Sites<sup>1</sup>**

Site	Tuscola	Mattoon	Jewett	Odessa
Stability Class	F	F	F	F
Wind speed (feet/second [meters/second])	4.9 (1.5)	4.9 (1.5)	4.9 (1.5)	4.9 (1.5)
Highest daily maximum temperature (°F [°C])	97 (36)	101 (38)	104 (40)	106 (41)
Percent of time for calm wind	4.14 percent	8.14 percent	20.8 percent	4.8 percent
Maximum NH <sub>3</sub> (ppmv)				
30	14,108 feet (4,300 meters)	14,764 feet (4,500 meters)	15,092 feet (4,600 meters)	15,584 feet (4,750 meters)
110	6,234 (1,900)	6,890 (2,100)	6,890 (2,100)	7,874 (2,400)
160	5,249 (1,600)	5,577(1,700)	5,577 (1,700)	6,562 (2,000)
220	4,265 (1,300)	4,593 (1,400)	4,921 (1,500)	5,577 (1,700)
390	3,159 (963)	3,281 (1,000)	3,609 (1,100)	3,937 (1,200)
550	2,602 (793)	2,785 (849)	2,907 (886)	3,281 (1,000)
1,100	1,752 (534)	1,879 (573)	1,969 (600)	2,277 (694)
1,600	1,414 (431)	1,519 (463)	1,591 (485)	1,841 (561)
2,700	1,043 (318)	1,125 (343)	1,178 (359)	1,362 (415)

<sup>1</sup> ALOHA predicted maximum radii to specific NH<sub>3</sub> concentrations due to releases from an evaporating puddle at Tuscola, Mattoon, and Odessa for the 23.1-ton (21-metric ton) truck release scenario using the worst-case meteorological conditions of 4.9 feet/second (1.5 meters/second) wind speed and Pasquill stability class F. The percent of time for the worst-case condition, which is called calm wind, is obtained from each site's wind rose data.

°F = degree Fahrenheit; °C = degree Celsius

**Table F-8. Predicted NH<sub>3</sub>-Concentration Radii Under the Second Most Conservative Set of Meteorological Conditions at Each Site<sup>1</sup>**

Site	Tuscola	Mattoon	Jewett	Odessa
Stability Class	D	D	D	D
Wind speed (feet/second [meters/second])	39.4 (12)	39.4 (12)	26.2 (8)	26.2 (8)
Highest daily maximum temperature (°F [°C])	97 (36)	101 (38)	104 (40)	106 (41)
Percent of time for each combination	2.15 percent	0.27 percent	8.43 percent	20.89 percent
Maximum NH <sub>3</sub> (ppmv)				
30	4,593 feet (1,400 meters)	4,921 feet (1,500 meters)	5,249 feet (1,600 meters)	5,249 feet (1,600 meters)
110	2,126 (648)	2,270 (692)	2,493 (760)	2,589 (789)

**Table F-8. Predicted NH<sub>3</sub>-Concentration Radii Under the Second Most Conservative Set of Meteorological Conditions at Each Site<sup>1</sup>**

160	1,709 (521)	1,824 (556)	2,001 (610)	2,080 (634)
220	1,424 (434)	1,522 (464)	1,667 (508)	1,729 (527)
390	1,027 (313)	1,099 (335)	1,201 (366)	1,247 (380)
550	846 (258)	906 (276)	988 (301)	1,027 (313)
1,100	571 (174)	607 (185)	666 (203)	692 (211)
1,600	456 (139)	489 (149)	535 (163)	558 (170)
2,700	325 (99)	351 (107)	390 (119)	407 (124)

<sup>1</sup> ALOHA predicted maximum radii to specific NH<sub>3</sub> concentrations due to releases from an evaporating puddle at Tuscola, Mattoon, and Odessa for the 23.1-ton (21-metric ton) release scenario using the second worst wind speed/stability class combinations. Meteorological data were obtained from each site's wind rose data.

°F = degree Fahrenheit; °C = degree Celsius

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**Reader Aids**

Consult the Reader Aids section at the end of this issue for phone numbers, online resources, finding aids, reminders, and notice of recently enacted public laws.

To subscribe to the Federal Register Table of Contents LISTSERV electronic mailing list, go to <http://listserv.access.gpo.gov> and select Online mailing list archives, FEDREGTOC-L, Join or leave the list (or change settings); then follow the instructions.

**ENVIRONMENTAL PROTECTION AGENCY****[ER-FRL-6687-5]****Environmental Impact Statements and Regulations; Availability of EPA Comments**

Availability of EPA comments prepared pursuant to the Environmental Review Process (ERP), under section 309 of the Clean Air Act and Section 102(2)(c) of the National Environmental Policy Act as amended. Requests for copies of EPA comments can be directed to the Office of Federal Activities at 202-564-7167.

An explanation of the ratings assigned to draft environmental impact statements (EISs) was published in FR dated April 6, 2007 (72 FR 17156).

**Draft EISs**

EIS No. 20070116, ERP No. D-AFS-J65478-00, Norwood Project, Proposes to Implement Multiple Resource Management Actions, Black Hills National Forest, Hell Canyon Ranger District, Pennington County, SD and Weston and Crook Counties, WY.

*Summary:* EPA expressed environmental concerns about impacts to water quality, impacts to wetlands, impacts from noxious and invasive weeds, and impacts to wildlife habitat. Also, the final EIS should include information about future interactions with the soon to be completed cellulosic ethanol plant.

Rating EC2.

EIS No. 20070119, ERP No. D-NOA-L02034-AK, PROGRAMMATIC—Outer Continental Shelf Seismic Surveys in the Beaufort and Chukchi Seas, Proposed Offshore Oil and Gas Seismic Survey, AK.

*Summary:* EPA expressed environmental concerns about the uncertainties presented in the document that do not provide support for many of the documents alternatives and conclusions. EPA also requested that the cumulative effects analysis be expanded.

Rating EC2.

EIS No. 20070122, ERP No. D-BLM-J03020-00, Overland Pass Natural Gas Liquids Pipeline Project (OPP), Construction and Operation of 760 Mile Natural Gas Liquids Pipeline, Right-of-Way Grant, KS, WY and CO.

*Summary:* EPA expressed environmental concerns about potential impacts to river and stream water quality. EPA requested additional analysis of water quality impacts and mitigation measures.

Rating EC2.

EIS No. 20070154, ERP No. D-NOA-E91018-00, Amendment 27 to the Reef Fish Fishery Management Plan and Amendment 14 to the Shrimp Fishery Management Plan, To Address Stock Rebuilding and Overfishing of Red Snapper, Gulf of Mexico.

*Summary:* EPA does not object to the proposed actions.

Rating LO.

EIS No. 20070140, ERP No. DR-NOA-A91073-00, PROGRAMMATIC—Toward an Ecosystem Approach for the Western Pacific Region: From Species-Based Fishery Management Plans to Place-Based Fishery Ecosystem Plans, Bottomfish and Seamount Groundfish, Coral Reef Ecosystems, Crustaceans, Precious Corals, Pelagics, Implementation, American Samoa, Commonwealth of the Northern Mariana Islands, Hawaii, U.S. Pacific Remote Island Area.

*Summary:* EPA expressed a lack of objections to the proposed action.

Rating LO.

**Final EISs**

EIS No. 20070164, ERP No. F-AFS-J65440-MT, Northeast Yaak Project, Additional Documentation of Cumulative Effects Analysis, Proposed Harvest to Reduce Fuels in Old Growth, Implementation, Kootenai National Forest, Three Rivers Ranger District, Lincoln County, MT.

*Summary:* EPA continues to express concern about impacts to wildlife habitat.

Dated: May 29, 2007.

**Ken Mittelholtz,**

*Environmental Protection Specialist, Office of Federal Activities.*

[FR Doc. E7-10600 Filed 5-31-07; 8:45 am]

**BILLING CODE 6560-50-P**

**ENVIRONMENTAL PROTECTION AGENCY****[ER-FRL-6687-4]****Environmental Impact Statements; Notice of Availability**

*Responsible Agency:* Office of Federal Activities, General Information (202) 564-7167 or <http://www.epa.gov/compliance/nepa/>.

Weekly receipt of Environmental Impact Statements

Filed 05/21/2007 Through 05/25/2007 Pursuant to 40 CFR 1506.9.

EIS No. 20070205, Draft EIS, AFS, WA, Tripod Fire Salvage Project, Proposal to Salvage Harvest Dead Trees and Fire-Injured Trees Expected to Die Within One Year, Methow Valley and Tonasket Ranger Districts, Okanogan

and Wenatchee National Forests, Okanogan County, WA, *Comment Period Ends:* 07/16/2007, *Contact:* John Newcom 509-996-4003.

EIS No. 20070206, Final EIS, FHW, NY, NY Route 347 Safety and Mobility Improvement Project, from Northern State Parkway to NY Route 25A, Funding, Towns of Smithtown, Islip and Brookhaven, Suffolk County, NY, *Wait Period Ends:* 07/02/2007, *Contact:* Robert Arnold 518-431-4167.

EIS No. 20070207, Draft EIS, AFS, SD, Citadel Project Area, Proposes to Implement Multiple Resource Management Actions, Northern Hills Ranger District, Black Hills National Forest, Lawrence County, SD, *Comment Period Ends:* 07/16/2007, *Contact:* Chris Stores 605-642-4622.

EIS No. 20070208, Draft EIS, HUD, CA, Vista Village Workforce Housing Project, To Provide Professional Managed Affordable Housing, Tahoe Vista, Placer County, CA, *Comment Period Ends:* 07/16/2007, *Contact:* Joanne Auerboch 530-745-3150.

EIS No. 20070209, Draft EIS, FHW, NY, Long Island Truck-Rail Intermodal (LITRIM) Facility, Construction and Operation, Right-of-Way Acquisition, Town of Islip, Suffolk County, NY, *Comment Period Ends:* 07/25/2007, *Contact:* Robert Arnold 518-431-4127.

EIS No. 20070210, Draft EIS, USA, CA, Camp Parks Real Property Master Plan and Real Property Exchange, Provide Exceptional Training and Modern Facilities for Soldiers, Master Planned Development, Alameda and Contra Costa Counties, CA, *Comment Period Ends:* 07/16/2007, *Contact:* Amy Phillip 925-875-4298.

EIS No. 20070211, Draft EIS, AFS, OR, Thorn Fire Salvage Recovery Project, Salvaging Dead and Dying Timber, Shake Table Fire Complex, Malheur National Forest, Grant County, OR, *Comment Period Ends:* 07/16/2007, *Contact:* Jerry Hensley 541-575-3000.

EIS No. 20070212, Draft EIS, TVA, AL, Bear Creek Dam Leakage Resolution Project, To Modify Dam and Maintain Summer Pool Level of 576 Feet, Bear Creek Dam, Franklin County, AL, *Comment Period Ends:* 07/16/2007, *Contact:* James F. Williamson 865-632-6418.

EIS No. 20070213, Draft EIS, DOE, 00, FutureGen Project, Planning, Design, Construction and Operation a Coal Fueled Electric Power and Hydrogen Gas Production Plant, Four Alternative Sites: Mattoon, IL, Tuscola, IL, Jewett, TX and Odessa, TX, *Comment Period Ends:* 07/16/

2007, *Contact*: Mark McKoy 304-285-4426.

*EIS No. 20070214, Final EIS, FRC, 00*, East Texas to Mississippi Expansion Project, Construction and Operation of 243.3 miles Natural Gas Pipeline to Transport Natural Gas from Production Fields in eastern Texas to Markets in the Gulf Coast, Midwestern, Northeastern and Southeastern United States, *Wait Period Ends*: 07/02/2007, *Contact*: Andy Black 1-866-208-3372.

*EIS No. 20070216, Draft Supplement, AFS, 00*, Southwest Idaho Ecogroup Land and Resource Management Plan, Additional Information Concerning Terrestrial Management Indicator Species (MIS), Boise National Forest, Payette National Forest and Sawtooth National Forest, Forest Plan Revision, Implementation, Several Counties, ID; Malheur County, OR and Box Elder County, UT, *Comment Period Ends*: 08/30/2007, *Contact*: Sharon LaBrecque 208-737-3200.

*EIS No. 20070217, Final EIS, CDB, NY*, East River Waterfront Esplanade and Piers Project, Revitalization, Connecting Whitehall Ferry Terminal and Peter Minuit Plaza to East River Park, Funding New York, NY, *Wait Period Ends*: 07/02/2007, *Contact*: Irene Chang 212-962-2300.

*EIS No. 20070218, Draft EIS, FHW, CA*, Interstate 405 (San Diego Freeway) Sepulveda Pass Widening Project, From Interstate 10 to US-101 in the City of Los Angeles, Los Angeles County, CA, *Comment Period Ends*: 07/16/2007, *Contact*: Steve Healow 916-498-5849.

*EIS No. 20070219, Final EIS, AFS, 00*, Norwood Project, Proposes to Implement Multiple Resource Management Actions, Black Hills National Forest, Hell Canyon Ranger District, Pennington County, SD and Weston and Crook Counties, WY, *Wait Period Ends*: 07/02/2007, *Contact*: Kelly Honors 605-673-4853.

#### Amended Notices

*EIS No. 20070069, Second Final Supplement, FHW, WV*, Appalachian Corridor H Project, Construction of a 9-mile Long Segment between the Termini of Parsons and Davis, Updated Information the Parsons-to-Davis Project, Funding and U.S. Army COE Section 404 Permit Issuance, Tucker County, WV, *Wait Period Ends*: 08/01/2007, *Contact*: Thomas J. Smith 304-347-5928. Revision to FR Notice Published 03/02/2007: Reopen and Extending Comment Period from 4/27/2007 to August 1, 2007.

Dated: May 29, 2007.

**Ken Mittelholtz,**

*Environmental Protection Specialist, NEPA Compliance Division, Office of Federal Activities.*

[FR Doc. E7-10593 Filed 5-31-07; 8:45 am]

**BILLING CODE 6560-50-P**

#### ENVIRONMENTAL PROTECTION AGENCY

[EPA-HQ-OPP-2006-0072; FRL-8131-1]

#### Pesticide Products; Registration Applications

**AGENCY:** Environmental Protection Agency (EPA).

**ACTION:** Notice.

**SUMMARY:** This notice announces receipt of applications to register pesticide products containing new active ingredients not included in any currently registered products pursuant to the provisions of section 3(c)(4) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended.

**DATES:** Comments must be received on or before July 31, 2007.

**ADDRESSES:** Submit your comments, identified by docket identification (ID) number EPA-HQ-OPP-2006-0072, by one of the following methods:

- *Federal eRulemaking Portal:* <http://www.regulations.gov>. Follow the on-line instructions for submitting comments.

- *Mail:* Office of Pesticide Programs (OPP) Regulatory Public Docket (7502P), Environmental Protection Agency, 1200 Pennsylvania Ave., NW., Washington, DC 20460-0001.

- *Delivery:* OPP Regulatory Public Docket (7502P), Environmental Protection Agency, Rm. S-4400, One Potomac Yard (South Bldg.), 2777 S. Crystal Dr., Arlington, VA. Deliveries are only accepted during the Docket's normal hours of operation (8:30 a.m. to 4 p.m., Monday through Friday, excluding legal holidays). Special arrangements should be made for deliveries of boxed information. The Docket telephone number is (703) 305-5805.

*Instructions:* Direct your comments to docket ID number EPA-HQ-OPP-2006-0072. EPA's policy is that all comments received will be included in the docket without change and may be made available on-line at <http://www.regulations.gov>, including any personal information provided, unless the comment includes information claimed to be Confidential Business Information (CBI) or other information whose disclosure is restricted by statute. Do not submit information that you

consider to be CBI or otherwise protected through [regulations.gov](http://www.regulations.gov) or e-mail. The Federal [regulations.gov](http://www.regulations.gov) website is an "anonymous access" system, which means EPA will not know your identity or contact information unless you provide it in the body of your comment. If you send an e-mail comment directly to EPA without going through [regulations.gov](http://www.regulations.gov), your e-mail address will be automatically captured and included as part of the comment that is placed in the docket and made available on the Internet. If you submit an electronic comment, EPA recommends that you include your name and other contact information in the body of your comment and with any disk or CD-ROM you submit. If EPA cannot read your comment due to technical difficulties and cannot contact you for clarification, EPA may not be able to consider your comment. Electronic files should avoid the use of special characters, any form of encryption, and be free of any defects or viruses.

*Docket:* All documents in the docket are listed in the docket index available in [regulations.gov](http://www.regulations.gov). To access the electronic docket, go to <http://www.regulations.gov>, select "Advanced Search," then "Docket Search." Insert the docket ID number where indicated and select the "Submit" button. Follow the instructions on the [regulations.gov](http://www.regulations.gov) web site to view the docket index or access available documents. Although listed in the index, some information is not publicly available, e.g., CBI or other information whose disclosure is restricted by statute. Certain other material, such as copyrighted material, is not placed on the Internet and will be publicly available only in hard copy form. Publicly available docket materials are available either in the electronic docket at <http://www.regulations.gov>, or, if only available in hard copy, at the OPP Regulatory Public Docket in Rm. S-4400, One Potomac Yard (South Bldg.), 2777 S. Crystal Dr., Arlington, VA. The hours of operation of this Docket Facility are from 8:30 a.m. to 4 p.m., Monday through Friday, excluding legal holidays. The Docket telephone number is (703) 305-5805.

#### FOR FURTHER INFORMATION CONTACT:

Eugene Wilson, Registration Division (7505P), Office of Pesticide Programs, Environmental Protection Agency, 1200 Pennsylvania Ave., NW., Washington, DC 20460-0001; telephone number: (703) 305-6103; e-mail address: [wilson.eugene@epa.gov](mailto:wilson.eugene@epa.gov).

#### SUPPLEMENTARY INFORMATION:

State	Parents of dependents and independ- ents with dependents other than a spouse		Dependents and independents without depend- ents other than a spouse
	Under \$15,000 (percent)	\$15,000 & up (percent)	All (percent)
New York .....	9	8	6
North Carolina .....	6	5	4
North Dakota .....	2	1	1
Ohio .....	6	5	4
Oklahoma .....	6	5	3
Oregon .....	7	6	5
Pennsylvania .....	5	4	3
Rhode Island .....	7	6	4
South Carolina .....	5	4	3
South Dakota .....	2	1	1
Tennessee .....	2	1	1
Texas .....	3	2	1
Utah .....	5	4	4
Vermont .....	5	4	3
Virginia .....	5	4	3
Washington .....	4	3	2
West Virginia .....	3	2	2
Wisconsin .....	7	6	4
Wyoming .....	2	1	1
Other .....	3	2	2

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**Note:** The official version of this document is the document published in the **Federal Register**. Free Internet access to the official edition of the **Federal Register** and the Code of Federal Regulations is available on GPO Access at: <http://www.gpoaccess.gov/nara/index.html>.

(Catalog of Federal Domestic Assistance Numbers: 84.007 Federal Supplemental Educational Opportunity Grant; 84.032 Federal Family Education Loan Program; 84.033 Federal Work-Study Program; 84.038 Federal Perkins Loan Program; 84.063 Federal Pell Grant Program; 84.268 William D. Ford Federal Direct Loan Program; 84.375 Academic Competitiveness Grant; 84.376 National Science and Mathematics Access to Retain Talent Grant)

Dated: May 29, 2007.

**Theresa S. Shaw**,  
Chief Operating Officer, Federal Student Aid.  
[FR Doc. E7-10621 Filed 5-31-07; 8:45 am]  
BILLING CODE 4000-01-P

**ELECTION ASSISTANCE COMMISSION  
Cancellation Notice of a Sunshine Act Meeting**

**AGENCY:** United States Election Assistance Commission (EAC).  
**ACTION:** Notice to Cancel EAC Standards Board Virtual Public Meeting.

**SUMMARY:** The U.S. Election Assistance Commission has cancelled the EAC Standards Board Virtual Public Meeting scheduled for Monday, June 18, 2007, 7 a.m. EDT through Wednesday, June 20, 5 p.m. EDT. The meeting was announced in a sunshine notice that was published in the **Federal Register** on Thursday, May 31, 2007. PERSON TO CONTACT FOR INFORMATION: Bryan Whitener, Telephone: (202) 566-3100.

**Gracia M. Hillman**,  
Commissioner, U.S. Election Assistance Commission.  
[FR Doc. 07-2772 Filed 5-30-07; 3:31 pm]  
BILLING CODE 6820-KF-M

**DEPARTMENT OF ENERGY**

**Notice of Availability of the Draft Environmental Impact Statement for the FutureGen Project**

**AGENCY:** Department of Energy.  
**ACTION:** Notice of availability and public hearings.

**SUMMARY:** The U.S. Department of Energy (DOE) announces the availability

of the document, Draft Environmental Impact Statement for the FutureGen Project (DOE/EIS-0394D), for public comment. The draft environmental impact statement (EIS) analyzes the potential environmental consequences of DOE's proposed action to provide federal funding for the FutureGen Project. The Project would include the planning, design, construction and operation of the FutureGen facility, a prototype electric power and hydrogen gas generating plant that employs coal gasification technology integrated with combined-cycle electricity generation and the capture and geologic sequestration of the carbon dioxide (CO<sub>2</sub>) emissions. The project would also include a research platform, which would be a principal feature of the prototype plant. The proposed action would be undertaken by a private sector, non-profit consortium of industrial participants known as the FutureGen Alliance, Inc., (the Alliance). The Alliance includes some of the largest coal producers and electricity generators in the world. Under a Cooperative Agreement between DOE and the Alliance, the Alliance would be primarily responsible for implementing the FutureGen Project, while DOE would guide the Alliance at a programmatic level to ensure the FutureGen Project's objectives are met.

The Department prepared the draft EIS in accordance with the National Environmental Policy Act of 1969 (NEPA) (42 U.S.C. 4321 *et seq.*), the Council on Environmental Quality

(CEQ) regulations that implement the procedural provisions of NEPA (40 CFR parts 1500–1508), and DOE procedures implementing NEPA (10 CFR part 1021).

DOE identified four reasonable alternative sites for analysis in the EIS. Based on the EIS, DOE will determine which sites, if any, are acceptable to DOE to host the FutureGen Project. The four sites currently being considered for the FutureGen Project are: Mattoon, Illinois; Tuscola, Illinois; Jewett, Texas; and Odessa, Texas. The Project would incorporate cutting-edge research, as well as help develop promising new energy-related technologies at a commercial scale. Performance and economic test results from the FutureGen Project would be shared among all participants, industry, the environmental community, and the public.

The proposed power plant would be a 275-megawatt (MW) output Integrated Gasification Combined-Cycle (IGCC) system combined with CO<sub>2</sub> capture and geologic storage at a rate of at least 1.1 million tons of CO<sub>2</sub> per year. The research facilities and power plant would be constructed at one of the four alternative sites identified above. The potential environmental impacts of locating and operating the FutureGen Project at each of the alternative sites are evaluated in the draft EIS. The draft EIS also analyzed the No-Action Alternative, under which DOE would not share in the cost for constructing and operating the FutureGen Project. Without DOE funding, neither the Alliance nor U.S. industry would likely undertake the commercial scale integration of CO<sub>2</sub> capture and geologic sequestration in deep saline reservoirs with a coal-fueled power plant in a comparable timeframe.

**DATES:** DOE invites the public to comment on the draft EIS during the public comment period, which ends July 16, 2007. DOE will consider all comments postmarked or received during the public comment period in preparing the final EIS, and will consider late comments to the extent practicable.

DOE will conduct public hearings near each of the four candidate sites to obtain comments on the draft EIS. The meeting schedule is: June 19, 2007 in Midland, Texas; June 21, 2007 in Buffalo, Texas; June 26, 2007 in Mattoon, Illinois; and June 28, 2007 in Tuscola, Illinois. Informational sessions will be held at each location from 4 p.m. to 7 p.m., preceding the formal presentations and formal comment period from 7 p.m. to 9 p.m. See the **SUPPLEMENTARY INFORMATION** section for

details on the meeting process and locations.

**ADDRESSES:** Requests for information about this draft EIS and requests to receive a copy of the draft EIS should be directed to: Mr. Mark L. McKoy, NEPA Document Manager, U.S. Department of Energy, National Energy Technology Laboratory, P.O. Box 880, Morgantown, WV 26507–0880, Attn: FutureGen Project EIS. Mr. McKoy can also be contacted by telephone at (304) 285–4262, toll free at 1–800–432–8330 (extension 4262), fax 304–285–4403, or e-mail [FutureGen.EIS@netl.doe.gov](mailto:FutureGen.EIS@netl.doe.gov). Additional information about the draft EIS may also be requested or messages recorded by calling the FutureGen telephone line at (304) 285–4262, or toll free at (800) 432–8330 (extension 4262). The draft EIS will be available via the Internet at <http://www.eh.doe.gov/nepa/>. Copies of the draft EIS are also available for public review at the locations listed in the **SUPPLEMENTARY INFORMATION** section of this Notice.

Written comments on the draft EIS can be mailed to Mr. Mark L. McKoy, NEPA Document Manager, at the address noted above. Written comments may also be submitted by fax to: (304) 285–4403; or submitted electronically to: [FutureGen.EIS@netl.doe.gov](mailto:FutureGen.EIS@netl.doe.gov). In addition to providing oral comments during the public hearings, oral comments on the draft EIS may be recorded by calling the FutureGen telephone line at (304) 285–4262, or toll free at (800) 432–8330 (extension 4262).

*For Additional Information:* For further information on the proposed project or the draft EIS, contact Mr. Mark L. McKoy as directed above. For general information regarding the DOE NEPA process, please contact: Ms. Carol M. Borgstrom, Director, Office of NEPA Policy and Compliance (GC–20), U.S. Department of Energy, 1000 Independence Avenue, SW., Washington, DC 20585–0119, Telephone: (202) 586–4600, or leave a message at (800) 472–2756.

#### **SUPPLEMENTARY INFORMATION:**

##### **Background**

President Bush proposed on February 27, 2003, that the United States undertake a \$1 billion, 10-year project to build the world's first coal-fueled plant to produce electricity and hydrogen with near-zero emissions. In response to this announcement, the DOE developed plans for the FutureGen Project, which would establish the technical and economic feasibility of producing electricity and hydrogen from coal—a low-cost and abundant energy resource—while capturing and

geologically storing the CO<sub>2</sub> generated in the process.

DOE would implement the FutureGen Project through a Cooperative Agreement that provides financial assistance to the FutureGen Alliance, Inc., a non-profit corporation that represents a global coalition of coal and energy companies. The Alliance members are: American Electric Power Company, Inc. (Columbus, OH); Anglo American, LLC (London, UK); BHP Billiton Limited (Melbourne, Australia); China Huaneng Group (Beijing, China); CONSOL Energy, Inc. (Pittsburgh, PA); E.ON U.S. LLC (Louisville, KY); Foundation Coal Holdings, Inc. (Linthicum Heights, MD); Peabody Energy Corporation (St. Louis, MO); PPL Corporation (Allentown, PA); Rio Tinto Energy America (Gillette, WY); Southern Company (Atlanta, GA); and Xstrata Coal (Sydney, Australia). Several foreign governments have entered into discussions with DOE regarding possible contributions.

##### **Description of Alternatives**

DOE analyzed four alternative sites and the No Action Alternative. Under the No Action Alternative DOE would not share in the cost for constructing and operating the FutureGen Project. Without DOE funding, neither the Alliance nor U.S. industry would likely undertake the commercial scale integration of CO<sub>2</sub> capture and geologic sequestration in deep saline reservoirs with a coal-fueled power plant in a comparable timeframe.

Under the proposed action, DOE would provide financial assistance to the Alliance to plan, design, construct, and operate the FutureGen Project. DOE has identified four potential sites and, based on the EIS, will determine which sites, if any, are acceptable to DOE to host the FutureGen Project. The four sites currently being considered as reasonable alternatives for the FutureGen Project are: Mattoon, Illinois; Tuscola, Illinois; Jewett, Texas; and Odessa, Texas. The FutureGen Project would include a coal-fueled electric power and hydrogen production plant. The power plant would be a 275-megawatt (MW) output Integrated Gasification Combined Cycle (IGCC) system combined with CO<sub>2</sub> capture and geologic storage at a rate of at least 1.1 million tons of CO<sub>2</sub> per year.

The draft EIS analyzes the environmental consequences that may result from the proposed action at each of the four candidate sites. Potential impacts identified during the scoping process and analyzed in the draft EIS relate to: Air quality; climate and meteorology; geology; physiography and

soils; groundwater; surface water; wetlands and floodplains; biological resources; cultural resources; land use; aesthetics; transportation and traffic noise and vibration; utility systems; materials and waste management; human health, safety, and accidents; community services; socioeconomics; and environmental justice.

#### Availability of the Draft EIS

Copies of the draft EIS have been distributed to members of Congress, Federal, State, and local officials, and agencies, organizations, and individuals who may be interested or affected. The draft EIS will be available on the Internet at: <http://www.eh.doe.gov/nepa/>. Additional copies can also be requested by contacting the NEPA Document Manager, as indicated above under **ADDRESSES**. Copies of the draft EIS are also available for public review at the locations listed below.

Mattoon Public Library, 1600 Charleston Avenue, Mattoon, IL 61938.  
Tuscola Public Library, 112 East Sale Street, Tuscola, IL 61953.  
Fairfield City Library (near Jewett), 350 W. Main Street, Fairfield, TX 75480.  
University of Texas of the Permian Basin, J. Conrad Dunagan Library, Main Floor, 4901 E. University Avenue, Odessa, TX 79762-0001.

Additional information about the FutureGen Project can be found at these web sites: <http://www.doe.gov>; <http://fossil.energy.gov/programs/powersystems/futuregen/>; or <http://www.futuregenalliance.org>.

#### Public Meetings

DOE will conduct public hearings near each of the four candidate sites to obtain comments on the draft EIS. Requests to speak at the public hearings can be made by calling or writing to the NEPA Document Manager (see **ADDRESSES**). Requests to speak that have not been submitted prior to the hearing will be accepted in the order in which they are received during the hearing. Speakers are encouraged to provide a written version of their oral comments or supplementary materials for the record. Each speaker will be allowed approximately five minutes to present comments. Those speakers who want more than five minutes should indicate the length of time desired in their request. Depending on the number of speakers, DOE may need to limit all speakers to five minutes initially and provide additional opportunities as time permits. Comments will be recorded by a court reporter and will become part of the public record. Oral and written comments will be given equal consideration.

Each hearing will begin with an information session at approximately 4 p.m., followed by formal presentations and a formal comment session beginning at approximately 7 p.m. DOE will begin each meeting's formal session with an overview of the proposed FutureGen Project, followed by oral statements by the scheduled speakers. Speakers may be asked questions to help ensure that DOE fully understands the comments. A presiding officer will establish the order of speakers and provide any additional procedures necessary to conduct the meetings.

All meetings will be accessible to people with disabilities. Any individual with a disability requiring special assistance, such as a sign language interpreter, or a translator, should contact Mr. Mark McKoy, the NEPA Document Manager, (See **ADDRESSES**) at least 48 hours in advance of the meeting so that arrangements can be made.

#### Meeting Schedule

Texas—Odessa Site.

Date: June 19, 2007.

Place: Center for Energy and Economic Diversification (CEED) Building, 1400 North FM 1788, Midland, TX 79707.

Texas—Jewett Site.

Date: June 21, 2007.

Place: Buffalo Civic Center, 941 North Hill Street, Buffalo, TX 75831 (Located near the intersection of US-79 and I-45).

Illinois—Mattoon Site.

Date: June 26, 2007.

Place: Riddle Elementary School, 4201 Western Avenue, Mattoon, IL 61938 (Located at the corner of Western Avenue and 43rd Street [CR 300E]).

Illinois—Tuscola Site.

Date: June 28, 2007.

Place: Tuscola Community Building, 122 W. Central Avenue, Tuscola, IL 61953. (From I-57, take exit 212 to U.S. Hwy 36 and continue to the intersection of North Central Ave. and South Main Street).

Issued in Washington, DC, on May 25, 2007.

**Mark J. Matarrese,**

*Director, Office of Environment, Security, Safety and Health, Office of Fossil Energy.*

[FR Doc. E7-10563 Filed 5-31-07; 8:45 am]

**BILLING CODE 6450-01-P**

## DEPARTMENT OF ENERGY

### Federal Energy Regulatory Commission

[Docket No. IC07-542-000; FERC-542]

#### Commission Information Collection Activities, Proposed Collection; Comment Request; Extension

May 25, 2007.

**AGENCY:** Federal Energy Regulatory Commission.

**ACTION:** Notice.

**SUMMARY:** In compliance with the requirements of section 3506(c)(2)(a) of the Paperwork Reduction Act of 1995 (Pub. L. No. 104-13), the Federal Energy Regulatory Commission (Commission) is soliciting public comment on the specific aspects of the information collection described below.

**DATES:** Comments on the collection of information are due August 3, 2007.

**ADDRESSES:** Copies of sample filings of the proposed collection of information can be obtained from the Commission's Web site (<http://www.ferc.gov/docs-filings/elibrary.asp>) or from the Federal Energy Regulatory Commission, Attn: Michael Miller, Office of the Executive Director, ED-34, 888 First Street, NE., Washington, DC 20426. Comments may be filed either in paper format or electronically. Those parties filing electronically do not need to make a paper filing. For paper filing, the original and 14 copies of such comments should be submitted to the Secretary of the Commission, Federal Energy Regulatory Commission, 888 First Street, NE., Washington, DC 20426 and refer to Docket No. IC07-542-000.

Documents filed electronically via the Internet must be prepared in WordPerfect, MS Word, Portable Document Format, or ASCII format. To file the document, access the Commission's Web site at <http://www.ferc.gov>, choose the Documents & Filings tab, click on eFiling, then follow the instructions given. First time users will have to establish a user name and password. The Commission will send an automatic acknowledgement to the sender's e-mail address upon receipt of comments.

All comments may be viewed, printed or downloaded remotely via the Internet through FERC's homepage using the eLibrary link. For user assistance, contact [FERConlinesupport@ferc.gov](mailto:FERConlinesupport@ferc.gov) or toll-free at (866) 208-3676 or for TTY, contact (202) 502-8659.

#### FOR FURTHER INFORMATION CONTACT:

Michael Miller may be reached by telephone at (202) 502-8415, by fax at

## **Appendix H - Newspaper Ads**



**DOE/NETL ANNOUNCES  
PUBLIC HEARINGS ON  
PROPOSED FUTUREGEN  
PROJECT**



On Friday, June 1, 2007, the U.S. Department of Energy's (DOE) National Energy Technology Laboratory (NETL) published a Notice of Availability in the Federal Register ([71 FR 42840](#)) of the Draft Environmental Impact Statement (EIS) for the proposed action of providing financial assistance for the FutureGen Project to the FutureGen Alliance, Inc., a non-profit consortium of some of the world's largest coal producers and electricity generators.

The FutureGen Project would be the first commercial scale integration of a suite of advanced clean coal technologies. As a research facility, the project would produce 275 megawatts of electric power and hydrogen gas using coal gasification technology integrated with combined-cycle electricity generation. A major feature of the proposed prototype facilities would be the capture and geologic sequestration of carbon dioxide emissions. One of the sites being considered is the **Mattoon, Illinois** site, which is located approximately one mile northwest of the city of Mattoon.

Additional information can be found at the FutureGen website:  
<http://www.fossil.energy.gov/programs/powersystems/futuregen>.

NETL is hosting public hearings to present an overview of the project and Draft EIS followed by an opportunity for members of the public to provide oral and written comments for the record. A public hearing will be held:

**Tuesday, June 26, 2007  
4:00pm – 7:00pm Open House  
7:00pm – 9:00pm Formal Presentation  
Riddle Elementary School  
4201 Western Avenue  
Mattoon, Illinois 61938**

Individuals who wish to speak at a public hearing may register in advance by notifying DOE's NEPA Document Manager: Mr. Mark L. McKoy, National Energy Technology Laboratory, P.O. Box 880, MS N03, Morgantown, WV 26507-0880, or they may register at the public meetings. Oral comments will be initially limited to five minutes so that sufficient time will be available to allow all individuals to be heard. Other options for registering or submitting comments on the Draft EIS are by mail to Mark L. McKoy at the above address, fax (304-285-4403), e-mail ([FutureGen.EIS@netl.doe.gov](mailto:FutureGen.EIS@netl.doe.gov)), or telephone toll-free (1-800-432-8330, ext. 4262). If you require assistance, such as a sign language translator, for this meeting, please contact Mark L. McKoy, U.S. DOE-NETL.

For further information on the Draft EIS for the FutureGen Project, or to request additional copies, please contact Mark L. McKoy at the above address, call 1-800-432-8330, ext. 4262, or e-mail [FutureGen.EIS@netl.doe.gov](mailto:FutureGen.EIS@netl.doe.gov). The Draft EIS is available at the Mattoon Public Library in Mattoon, Illinois and posted on DOE's NEPA website at <http://www.eh.doe.gov/nepa/>.



**DOE/NETL ANNOUNCES  
PUBLIC HEARINGS ON  
PROPOSED FUTUREGEN  
PROJECT**



On Friday, June 1, 2007, the U.S. Department of Energy's (DOE) National Energy Technology Laboratory (NETL) published a Notice of Availability in the Federal Register ([71 FR 42840](#)) of the Draft Environmental Impact Statement (EIS) for the proposed action of providing financial assistance for the FutureGen Project to the FutureGen Alliance, Inc., a non-profit consortium of some of the world's largest coal producers and electricity generators.

The FutureGen Project would be the first commercial scale integration of a suite of advanced clean coal technologies. As a research facility, the project would produce 275 megawatts of electric power and hydrogen gas using coal gasification technology integrated with combined-cycle electricity generation. A major feature of the proposed prototype facilities would be the capture and geologic sequestration of carbon dioxide emissions. One of the sites being considered is the **Tuscola, Illinois** site, which is located 1.5 miles west of the city of Tuscola.

Additional information can be found at the FutureGen website:  
<http://www.fossil.energy.gov/programs/powersystems/futuregen>.

NETL is hosting public hearings to present an overview of the project and Draft EIS followed by an opportunity for members of the public to provide oral and written comments for the record. A public hearing will be held:

**Thursday, June 28, 2007  
4:00pm – 7:00pm Open House  
7:00pm – 9:00pm Formal Presentation  
Tuscola Community Building  
122 West Central Avenue  
Tuscola, Illinois 61953**

Individuals who wish to speak at a public hearing may register in advance by notifying DOE's NEPA Document Manager: Mr. Mark L. McKoy, National Energy Technology Laboratory, P.O. Box 880, MS N03, Morgantown, WV 26507-0880, or they may register at the public meetings. Oral comments will be initially limited to five minutes so that sufficient time will be available to allow all individuals to be heard. Other options for registering or submitting comments on the Draft EIS are by mail to Mark L. McKoy at the above address, fax (304-285-4403), e-mail ([FutureGen.EIS@netl.doe.gov](mailto:FutureGen.EIS@netl.doe.gov)), or telephone toll-free (1-800-432-8330, ext. 4262). If you require assistance, such as a sign language translator, for this meeting, please contact Mark L. McKoy, U.S. DOE-NETL.

For further information on the Draft EIS for the FutureGen Project, or to request additional copies, please contact Mark L. McKoy at the above address, call 1-800-432-8330, ext. 4262, or e-mail [FutureGen.EIS@netl.doe.gov](mailto:FutureGen.EIS@netl.doe.gov). The Draft EIS is available at the Tuscola Public Library in Tuscola, Illinois and posted on DOE's NEPA website at <http://www.eh.doe.gov/nepa/>.



**DOE/NETL ANNOUNCES  
PUBLIC HEARINGS ON  
PROPOSED FUTUREGEN  
PROJECT**



On Friday, June 1, 2007, the U.S. Department of Energy's (DOE) National Energy Technology Laboratory (NETL) published a Notice of Availability in the Federal Register ([71 FR 42840](#)) of the Draft Environmental Impact Statement (EIS) for the proposed action of providing financial assistance for the FutureGen Project to the FutureGen Alliance, Inc., a non-profit consortium of some of the world's largest coal producers and electricity generators.

The FutureGen Project would be the first commercial scale integration of a suite of advanced clean coal technologies. As a research facility, the project would produce 275 megawatts of electric power and hydrogen gas using coal gasification technology integrated with combined-cycle electricity generation. A major feature of the proposed prototype facilities would be the capture and geologic sequestration of carbon dioxide emissions. One of the sites being considered is the **Jewett (Heart of Brazos), Texas** site, which is located north of the town of Jewett along U.S. Highway 79 and Farm Road 39 at the intersection of Leon, Limestone, and Freestone counties.

Additional information can be found at the FutureGen website:  
<http://www.fossil.energy.gov/programs/powersystems/futuregen>.

NETL is hosting public hearings to present an overview of the project and Draft EIS followed by an opportunity for members of the public to provide oral and written comments for the record. A public hearing will be held:

**Thursday, June 21, 2007**  
**4:00pm – 7:00pm Open House**  
**7:00pm – 9:00pm Formal Presentation**  
**941 North Hill Street**  
**Buffalo, Texas 75831**

Individuals who wish to speak at a public hearing may register in advance by notifying DOE's NEPA Document Manager: Mr. Mark L. McKoy, National Energy Technology Laboratory, P.O. Box 880, MS N03, Morgantown, WV 26507-0880, or they may register at the public meetings. Oral comments will be initially limited to five minutes so that sufficient time will be available to allow all individuals to be heard. Other options for registering or submitting comments on the Draft EIS are by mail to Mark L. McKoy at the above address, fax (304-285-4403), e-mail ([FutureGen.EIS@netl.doe.gov](mailto:FutureGen.EIS@netl.doe.gov)), or telephone toll-free (1-800-432-8330, ext. 4262). If you require assistance, such as a sign language translator, for this meeting, please contact Mark L. McKoy, U.S. DOE-NETL.

For further information on the Draft EIS for the FutureGen Project, or to request additional copies, please contact Mark L. McKoy at the above address, call 1-800-432-8330, ext. 4262, or e-mail [FutureGen.EIS@netl.doe.gov](mailto:FutureGen.EIS@netl.doe.gov). The Draft EIS is available at the Fairfield City Library in Fairfield, Texas and posted on DOE's NEPA website at <http://www.eh.doe.gov/nepa/>.



**DOE/NETL ANNOUNCES  
PUBLIC HEARINGS ON  
PROPOSED FUTUREGEN  
PROJECT**



On Friday, June 1, 2007, the U.S. Department of Energy's (DOE) National Energy Technology Laboratory (NETL) published a Notice of Availability in the Federal Register ([71 FR 42840](#)) of the Draft Environmental Impact Statement (EIS) for the proposed action of providing financial assistance for the FutureGen Project to the FutureGen Alliance, Inc., a non-profit consortium of some of the world's largest coal producers and electricity generators.

The FutureGen Project would be the first commercial scale integration of a suite of advanced clean coal technologies. As a research facility, the project would produce 275 megawatts of electric power and hydrogen gas using coal gasification technology integrated with combined-cycle electricity generation. A major feature of the proposed prototype facilities would be the capture and geologic sequestration of carbon dioxide emissions. One of the sites being considered is the **Odessa, Texas** site, which is located approximately 15 miles southwest of Odessa, along Interstate Highway 20 at the town of Penwell.

Additional information can be found at the FutureGen website:  
<http://www.fossil.energy.gov/programs/powersystems/futuregen>.

NETL is hosting public hearings to present an overview of the project and Draft EIS followed by an opportunity for members of the public to provide oral and written comments for the record. A public hearing will be held:

**Tuesday, June 19, 2007  
4:00pm – 7:00pm Open House  
7:00pm – 9:00pm Formal Presentation  
CEED Auditorium  
1400 North FM 1788  
Midland, Texas 79707**

Individuals who wish to speak at a public hearing may register in advance by notifying DOE's NEPA Document Manager: Mr. Mark L. McKoy, National Energy Technology Laboratory, P.O. Box 880, MS N03, Morgantown, WV 26507-0880, or they may register at the public meetings. Oral comments will be initially limited to five minutes so that sufficient time will be available to allow all individuals to be heard. Other options for registering or submitting comments on the Draft EIS are by mail to Mark L. McKoy at the above address, fax (304-285-4403), e-mail ([FutureGen.EIS@netl.doe.gov](mailto:FutureGen.EIS@netl.doe.gov)), or telephone toll-free (1-800-432-8330, ext. 4262). If you require assistance, such as a sign language translator, for this meeting, please contact Mark L. McKoy, U.S. DOE-NETL.

For further information on the Draft EIS for the FutureGen Project, or to request additional copies, please contact Mark L. McKoy at the above address, call 1-800-432-8330, ext. 4262, or e-mail [FutureGen.EIS@netl.doe.gov](mailto:FutureGen.EIS@netl.doe.gov). The Draft EIS is available at the University of Texas Permian Basin Library in Odessa, Texas and posted on DOE's NEPA website at <http://www.eh.doe.gov/nepa/>.

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**Appendix I – Public Hearing Agendas**

# Agenda

## U.S. Department of Energy National Energy Technology Laboratory

### Public Hearing for the FutureGen Project Draft Environmental Impact Statement

Tuesday, June 26, 2007  
Riddle Elementary School  
4201 Western Avenue  
Mattoon, Illinois 61938

4:00 pm	<b>Informal Session</b>	<b>DOE/Alliance</b>
	Poster Session and Questions	
	Formal Comment Sign-In (at Comment Sign-In Station)*	
	Informal Comment Collection	
7:00 pm	<b>Formal Session</b>	<b>DOE/Alliance</b>
	Welcome	Mark McKoy (DOE)
	Background & DOE's Role	Tom Sarkus (DOE)
	FutureGen Project Overview	Michael Mudd (FutureGen Alliance)
	NEPA, Draft EIS, and Next Steps	Mark McKoy (DOE)
	<b>Formal Public Comments</b>	
	Elected Officials and Leaders (Federal, State, Local)	
	Agency Officials (Federal, State, Local)	
	General Public (in order of sign-in list)	
	Anyone not Previously Signed-In	
	<b>Adjourn</b>	

*\*A Court Reporter will be available to write down your comments during the informal session (4:00 to 7:00 pm) and during the formal session (7:00 to 9:00 pm). Your comments may also be provided to DOE in writing on the comments forms provided.*

# Agenda

## U.S. Department of Energy National Energy Technology Laboratory

### Public Hearing for the FutureGen Project Draft Environmental Impact Statement

Thursday, June 28, 2007  
Tuscola Community Building  
122 West Central Avenue  
Tuscola, Illinois 61953

4:00 pm	<b>Informal Session</b>	<b>DOE/Alliance</b>
	Poster Session and Questions	
	Formal Comment Sign-In (at Comment Sign-In Station)*	
	Informal Comment Collection	
7:00 pm	<b>Formal Session</b>	<b>DOE/Alliance</b>
	Welcome	Mark McKoy (DOE)
	Background & DOE's Role	Tom Sarkus (DOE)
	FutureGen Project Overview	Michael Mudd (FutureGen Alliance)
	NEPA, Draft EIS, and Next Steps	Mark McKoy (DOE)
	<b>Formal Public Comments</b>	
	Elected Officials and Leaders (Federal, State, Local)	
	Agency Officials (Federal, State, Local)	
	General Public (in order of sign-in list)	
	Anyone not Previously Signed-In	
	<b>Adjourn</b>	

*\*A Court Reporter will be available to write down your comments during the informal session (4:00 to 7:00 pm) and during the formal session (7:00 to 9:00 pm). Your comments may also be provided to DOE in writing on the comments forms provided.*

# Agenda

## U.S. Department of Energy National Energy Technology Laboratory

### Public Hearing for the FutureGen Project Draft Environmental Impact Statement

Thursday, June 21, 2007  
941 North Hill Street  
Buffalo, Texas 75831

4:00 pm	<b>Informal Session</b>	<b>DOE/Alliance</b>
	Poster Session and Questions	
	Formal Comment Sign-In (at Comment Sign-In Station)*	
	Informal Comment Collection	
7:00 pm	<b>Formal Session</b>	<b>DOE/Alliance</b>
	Welcome	Mark McKoy (DOE)
	Background & DOE's Role	Tom Sarkus (DOE)
	FutureGen Project Overview	Jerry Oliver (FutureGen Alliance)
	NEPA, Draft EIS, and Next Steps	Mark McKoy (DOE)
	<b>Formal Public Comments</b>	
	Elected Officials and Leaders (Federal, State, Local)	
	Agency Officials (Federal, State, Local)	
	General Public (in order of sign-in list)	
	Anyone not Previously Signed-In	
	<b>Adjourn</b>	

*\*A Court Reporter will be available to write down your comments during the informal session (4:00 to 7:00 pm) and during the formal session (7:00 to 9:00 pm). Your comments may also be provided to DOE in writing on the comments forms provided.*

# Agenda

## U.S. Department of Energy National Energy Technology Laboratory

### Public Hearing for the FutureGen Project Draft Environmental Impact Statement

Tuesday, June 19, 2007  
CEED Auditorium  
1400 North FM 1788  
Midland, Texas 79707

4:00 pm	<b>Informal Session</b>	<b>DOE/Alliance</b>
	Poster Session and Questions	
	Formal Comment Sign-In (at Comment Sign-In Station)*	
	Informal Comment Collection	
7:00 pm	<b>Formal Session</b>	<b>DOE/Alliance</b>
	Welcome	Mark McKoy (DOE)
	Background & DOE's Role	Tom Sarkus (DOE)
	FutureGen Project Overview	Jerry Oliver (FutureGen Alliance)
	NEPA, Draft EIS, and Next Steps	Mark McKoy (DOE)
	<b>Formal Public Comments</b>	
	Elected Officials and Leaders (Federal, State, Local)	
	Agency Officials (Federal, State, Local)	
	General Public (in order of sign-in list)	
	Anyone not Previously Signed-In	
	<b>Adjourn</b>	

*\*A Court Reporter will be available to write down your comments during the informal session (4:00 to 7:00 pm) and during the formal session (7:00 to 9:00 pm). Your comments may also be provided to DOE in writing on the comments forms provided.*

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**Appendix J – Commentor Sign-In Sheets**

# FutureGen Project

## Public Hearing

### Draft Environmental Impact Statement

Mattoon, Illinois

#### Commentor Sign-Up

NR.	TIME (for facilitator use)	NAME & TITLE (please print legibly)	ORGANIZATION (if applicable)
1.	3	KENT METZGER	
2.	6	Rep. Chapin Rose	State Representative 110
3.	7	Angela Griffin	Coles Together
4.	7	Larry Lilly	Mattoon Schools
5.	6	TOM POXWELL	Local Affairs Council Coles Co. Farm Bureau/ E-B-E-W LOCAL 146 Farmers
6.	4	<del>JAN TAYLOR</del>	<del>ELECTRICIANS</del>
7.	5	JIM McSHANE	CROSSROADS WORKFORCE INVESTMENT Bd.
8.		ANN SHURT	MAYOR SULLIVAN IL
9.		PHIL GONET	ILLINOIS COAL ASSOC.
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# FutureGen Project

## Public Hearing

### Draft Environmental Impact Statement

Tuscola, Illinois

#### Commentor Sign-Up

NR.	TIME (for facilitator use)	NAME & TITLE (please print legibly)	ORGANIZATION (if applicable)
1.		Joe Burgess	Tuscola CUSD #301
2.		Warren Ribley	IL Dept of Commerce & Economic Opportunity
3.		Vernon Knapp	IL State Water Survey
4.		DAVID COOK	Carle Hospital
5.		Larry Sapp	Carle Hospital
6.		Antia Cuffey	Carle Hospital
7.		William Looby	Illinois AFL-CIO
8.		Barry Matchett	Environmental Law & Policy Center
9.		ALAN SHOEMAKER	Tuscola Stone Co.
10.		MATTHEW JONES	U.S. Rep. Tim Johnson
11.		Dan Kleiss	Cabot Corporation
12.		Keggie Clinton	Ascola School Dist
13.		BRIAN MOODY	Tuscola School Dist.
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# FutureGen Project

## Public Hearing

### Draft Environmental Impact Statement

Formal Session  
7:00-9:00

Jewett, Texas

#### Commentor Sign-Up

NR.	TIME (for facilitator use)	NAME & TITLE (please print legibly)	ORGANIZATION (if applicable)
1.		Ivan Jackson JR. self	Ducks Unlimited Rancher
2.		Byron Keder	Leon Co. (Judge)
3.		Tom Wilkinson <sup>EX</sup> Director	BU COG
4.		Paul Benedict & Freestone County E.D.	
5.		Daniel Burkeon Limestone Co	JUDGE
6.		Lionel J. Milberger	none self (citizen)
7.		Michael Williams	Railroad Commissioner
8.		GARY J. MECHLER	NRG-TEXAS
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Commentors

- ① Michael Williams, Texas Railroad Commissioner
- ② ~~②~~ Byron Ryder, Leon County Judge
- ③ ~~③~~ Daniel Burkeen, Limestone County Judge
- ④ ~~④~~ Ivan Jackson Jr., Ducks Unlimited/Rancher
- ⑤ ~~⑤~~ Tom Wilkinson, Executive Director of the  
Brazos Valley Council of  
Governments
- ⑥ ~~⑥~~ Kevin Benedict, Freestone County Economic  
Developer
- ⑦ ~~⑦~~ Lionel J. Milberger, citizen
- ⑧ Gary J. Meckler, NRG-Texas

Jewett

## Acknowledgements

Michael Williams, Texas Railroad Commissioner

{ Chris Turner and  
Lindsey Davis, representing Congressman Chet Edwards

Mary Jo Hurley, representing State Senator Steve Ogden

Byron Ryder, Leon County Judge

Daniel Burkeen, Limestone County Judge

~~Eleanor Holmes, Former Limestone County Judge~~

Linda Grant, Freestone County Judge

Jan Roe, Robertson County Judge

~~Linda Ray, Anderson County Judge~~

Judy Kirkpatrick, Mayor of Jewett

Roy Hill, Mayor of Fairfield

# FutureGen Project

## Public Hearing

### Draft Environmental Impact Statement

FORMAL SIGNUP  
Odessa

Odessa, Texas

#### Commentor Sign-Up

NR.	TIME (for facilitator use)	NAME & TITLE (please print legibly)	ORGANIZATION (if applicable)
1.		COTT LABRANE	Clear Refined Coal Co
2.		<del>Gil Van Deventer</del>	<del>Trident Environmental</del>
3.		John Roswicz	Steve McDonald
4.		Ricky Wright	Cong. Mike Con.
5.		Gil Van Deventer	Trident Environn
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Michael L Williams  
RAILROAD Commissioner

---

Richey Wright  
Rep Cong. Michael Conaway

---

Denise Peckins  
Rep Sen Kel Seliger

— course

odessa

# ELECTED OFFICIALS

- ① Michael Williams, Railroad Commissioner
- ② Ricky Wright, representing Congressman Michael Conaway ~~stage stage~~
- ③ Denise Perkins, representing State Senator Seliger
- ★ ④ Royce Bodiford, { Odessa City Council District 3  
Mayor of Protem, City of Odessa
- ⑤ Mike George, President of the Odessa Chamber of Commerce

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## **Appendix K – Transcripts and Errata Sheets**

1 **Errata for the Transcript of**  
2 **the U.S. Department of Energy**  
3 **FutureGen Public Hearing**

4  
5 **June 26, 2007**  
6 **Riddle Elementary School**  
7 **Mattoon, Illinois**  
8

9 Acronyms Used

10 CD – Compact disc  
11 DOE – U.S. Department of Energy  
12 EIS – Environmental Impact Statement  
13 IGCC – Integrated Gasification Combined Cycle  
14 NEPA – National Environmental Policy Act  
15 NETL – National Energy Technology Laboratory  
16 R&D – Research and development  
17

18 Page 0000

19 Line 7 – Delete “A.D.”

20 Page 2

21 Line 1 – Change “MC KOY” to “McKOY”

22 Line 10 – Change “cites” to “sites”

23 Page 6

24 Line 13 – Change “R & D” to “R&D”

25 Page 9

26 Line 12 – Change “CO-2” to “CO2”

27 Line 15 – Change “CO-2” to “CO2”

28 Line 16 – Change “CO-2” to “CO2”

29 Line 17 – Change “CO-2” to “CO2”

30 Line 19 – Change “CO-2” to “CO2”

31 Page 11

32 Line 1 – Change “MC KOY” to “McKOY”

33 Page 14

34 Line 10 – Change “CO-2” to “CO2”

35 Page 15

36 Line 1 – Change “CO-2” to “CO2”

37 Line 19 – Change “CO-2” to “CO2”

38 Page 16

39 Line 23 – Change “R and D” to “R&D”

40 Page 17

41 Line 21 – Change “C0-2” to “CO2”

42 Line 24 – Change “CO-2” to “CO2”

43 Page 18

44 Line 14 – Change “CO-2” to “CO2”

45 Line 14 – Change “CO-2” to “CO2”

46 Line 18 – Change “foot” to “feet”

- 1 Line 18 – Change “CO-2” to “CO2”  
2 Page 21  
3 Line 13 – Change “MC KOY” to “McKOY”  
4 Page 27  
5 Line 20 – Change “MC KOY” to “McKOY”  
6 Page 30  
7 Line 20 – Change “CO-2” to “CO2”  
8 Page 32  
9 Line 5 – Change “our” to “are”  
10 Page 33  
11 Line 10 – Change “CO-2” to “CO2”  
12 Page 36  
13 Line 16 – Change “MC KOY” to “McKOY”  
14 Page 38  
15 Line 5 – Change “MC KOY” to “McKOY”  
16 Page 39  
17 Line 12 – Change “MC KOY” to “McKOY”  
18 Page 45  
19 Line 23 – Change “MC KOY” to “McKOY”  
20 Page 46  
21 Line 23– Change “CO-2” to “CO2”  
22 Page 47  
23 Line 15 – Change “page” to “pages”  
24 Page 48  
25 Line 5 – Change “MC KOY” to “McKOY”  
26 Line 7 – Change “MARK MC SHANE” to “JIM McSHANE”  
27 Line 23 – Change “MC KOY” to “McKOY”  
28 Page 50  
29 Line 4 – Change “CO-2” to “CO2”  
30 Page 51  
31 Line 3 – Change “MC KOY” to “McKOY”  
32 Page 52  
33 Line 7 – Change “MC KOY” to “McKOY”  
34 Page 53  
35 Line 20 – Change “MC KOY” to “McKOY”  
36 Page 55  
37 Line 1 – Change “MC KOY” to “McKOY”  
38 Line 4 – Change “KEN” to “KENT”  
39 Line 13 – Change “CO-2” to “CO 2”  
40 Line 19 – Change “MC KOY” to “McKOY”  
41 Page 56  
42 Line 22 – Change “MC KOY” to “McKOY”  
43 Page 58  
44 Line 6 – Change “MC KOY” to “McKOY”

1 STATE OF ILLINOIS )  
 ) SS  
2 COUNTY OF DOUGLAS )  
3

4 PROCEEDINGS

5  
6 The proceedings taken on the 26th day of June,  
7 2007 A.D., IN RE: DEPARTMENT OF ENERGY PUBLIC HEARING FOR  
8 THE FUTUREGEN PROJECT, taken at 7:00 p.m., at Riddle  
9 Elementary School, 122 West Central Avenue, Mattoon, Coles  
10 County, Illinois, before Susan Bursa, C.S.R., a Notary  
11 Public of Douglas County.  
12

13 PRESENT:

14 Mark McKoy  
15 DEPARTMENT OF ENERGY  
16 NEPA DOCUMENT MANAGER  
17  
18  
19  
20  
21  
22

23 Susan Bursa, C.S.R.  
24 709 Lincoln Place  
Arthur, Illinois 61911

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1 MARK MC KOY: Welcome to the Department of  
2 Energy's Public Hearing for the FutureGen Project.  
3 Let the record show that the hearing began on  
4 June 26, 2007, at 7:06 p.m., at the Riddle Elementary  
5 School, in Mattoon, Illinois.

6 As part of its compliance with the National  
7 Environmental Policy Act, the DOE has produced a Draft  
8 Environmental Impact Statement, or EIS. This document  
9 analyzes the potential environmental impact at the  
10 alternative sites for the proposed FutureGen Project. Both  
11 the document and the comments received should help the DOE  
12 in making better informed decisions.

13 The Draft EIS has been distributed to persons who  
14 have previously expressed some type of interest in the  
15 project. If you previously requested a copy of the  
16 document and have not received it, please provide your name  
17 and mailing address to Robin Griffin, Robin is located over  
18 here to your left, and indicate the form in which you would  
19 like to receive the document.

20 Also there are comment cards available that can be  
21 used to request a copy of the Draft EIS as well as the  
22 final EIS. And these cards are located at the DOE exhibits  
23 at the back of the room.

24 The document is available in three forms. You can

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1 receive the entire document in electronic form on a CD.  
2 You can receive a hard copy of the summary plus a CD with  
3 the entire document, or you can receive a hard copy of the  
4 entire document. We have, with us, a limited number of  
5 hard copies of the summary and CDs available tonight.

6 After the Draft EIS is distributed to the public, a  
7 public hearing is held to help gather comments on the  
8 document and on the proposed federal actions. During the  
9 informal session earlier this evening between 4 and 7 p.m.,  
10 DOE and its support contractors, as well as representatives  
11 of the FutureGen Alliance and the local site proponents,  
12 that is the FutureGen Illinois, Mattoon team, were  
13 available to listen to your concerns and to attempt to  
14 answer your questions. We hope the session was as  
15 informative for you as it was for us.

16 During the formal session tonight, we will briefly  
17 present the role of DOE; and we will go over the relevant  
18 parts that meet with compliance and the remaining  
19 schedules. And the FutureGen Alliance will briefly present  
20 an overview of the FutureGen Project. Then we will begin  
21 the formal comment session. As with the scoping meetings  
22 held in August, we will give priority to elected officials  
23 and their designated representatives to go first. However  
24 DOE realized, during the scoping meetings, the general

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1 public had to wait a long time before having the  
2 opportunity to speak. This time with the assistance and  
3 cooperation of the elected officials, we hope to give the  
4 general public an opportunity to speak sooner this  
5 evening.

6 We hope that all of you can stay for the entire oral  
7 comments session. For those who cannot stay, we still have  
8 a court reporter set up just down the hall here out through  
9 the door to your left, down the hall who can take oral  
10 comments. And that would be for people who just can't stay  
11 or feel uncomfortable speaking in front of a large  
12 audience. While we prefer that you provide oral comments

13 here during the formal, oral comment session later this  
14 evening, the comment station is an alternative. And this  
15 option will be available until we start the oral comment  
16 session here.

17 Written comments are given equal weight with oral  
18 comments, and written comments tend to be crafted more  
19 carefully and can be written at your convenience. You may  
20 provide written comments instead of or in addition to oral  
21 comments. Again, there are comment cards available at the  
22 DOE exhibits. You can fill out the cards and submit them  
23 tonight or anytime before the close of the comment period  
24 on July 16.

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1 You can provide comments by e-mail, regular mail,  
2 faxes, voice mail, and telephone calls, as indicated on the  
3 literature available at the DOE exhibits.

4 For tonight's agenda, there will be a presentation on  
5 DOE's role in the project. That presentation will be  
6 provided by Tom Sarkus from the DOE office in Pittsburgh.  
7 There will be a project overview provided by Mike Mudd, the  
8 CEO of the FutureGen Alliance. And I believe Jerry Oliver,  
9 the Senior Vice President, will also be involved in the  
10 presentation.

11 I will go over, briefly, some of the most relevant  
12 aspects of NEPA compliance in the NEPA schedule. And then  
13 we will get to the comments that are from you.

14 Visiting with us tonight, we have Bart Ellefritz,  
15 representing Senator Dick Durbin.

16 Is he here? Just left. Okay.

17 And when I call your name, please stand up for a  
18 moment.

19 Kathy Harrington, representing Senator Barack Obama.  
20 Thank you.

21 Rodney Davis, Project Director for US Representative  
22 John Shimkus. Thank you.

23 State Representative Chapin Rose. Thank you.

24 Jack Lavin, Director of Commerce and Economic

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1 Opportunity.

2 Charlie White, Mayor of Mattoon.

3 Ann Short, Mayor of Sullivan.

4 Dennis Hostetter, Mayor of Windsor. I didn't see  
5 Dennis.

6 Dave Schilling, Mattoon City Commissioner.

7 Joe McKenzie, Mattoon City Commissioner.

8 And Larry Reynolds, Charleston City Counsel.

9 Representing the Department of Energy, again,

10 Tom Sarkus. The Department of Energy NETL, National Energy  
11 Technology Laboratory at Pittsburgh. Tom is the DOE  
12 Project Director for FutureGen. He is with the Office of  
13 Coal and Power R & D.

14 We have Otis Mills. Otis. Otis is with the DOE  
15 office in Pittsburgh. He's our Media Relations Expert.

16 Jeff Hoffman, with the DOE office in Pittsburgh.

17 Jeff is a Systems Engineer working on the project.

18 Bill Guillian, with DOE in Morgantown. Bill is a  
19 geologist, recently assigned to the project.

20 And, of course, there is me. Mark McKoy, the DOE  
21 Environmental Manager and DOE NEPA Document Manager for  
22 FutureGen.

23 Also I want to recognize the team that has worked so  
24 hard to prepare the Draft EIS. That team is composed of

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1 Potomac-Hudson Engineering, Tetra Tech and Louis Berger;  
2 and we have with us this evening Fred Carey, who is the  
3 President of Potomac-Hudson Engineering. And the person  
4 who has endured the most in assembling this  
5 document -- she has put in countless hours and produced an  
6 excellent document for to us review -- Debra Walker, the  
7 NEPA Project Manager.

8 And I would like for all of the members present of  
9 the Potomac-Hudson, Tetra Tech, Louis Berger team to please  
10 stand up and be recognized.

11 And now it's time to, to give you a few presentations  
12 and provide you with some background information regarding  
13 the project.

14 Here is Tom Sarkus with the DOE role in the project.  
15 (Applause.)

16 TOM SARKUS: Thank you. And you're clapping  
17 and you haven't heard my speech yet. I hope you're happy  
18 after.

19 Good evening. I have, on the screen, a nighttime  
20 photo of Tampa Electric's Integrated Gasification Combined-  
21 Cycle Power Plant. It is one of just two coal-based IGCC  
22 plants in the United States. You may be aware of the other  
23 one in Wabash River near Terre Haute. And one of only six  
24 in the world. It's top dispatch unit in Tampa Electric's

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1 generating system. And it's been operating since September  
2 of 1996. I know all of that because I had the distinct  
3 privilege of supervising the Department of Energy's funding  
4 and cosponsorship for the Tampa and Wabash River IGCC  
5 plants.

6 But with operational plants having designs that are  
7 in most cases over 10 and approaching 15 years old at this  
8 point, it's time to build upon the lessons that have been  
9 learned from operating those plants and to bring on the  
10 next generation of clean-coal technologies. And that  
11 includes FutureGen.

12 When Wabash River and Tampa were designed in the  
13 early 1990's, if you think back, key external drivers were  
14 sulphur and nitrogen oxide emissions that were relevant to  
15 acid rain. Acid rain was the dominant environmental issue  
16 at that time.

17 We also had to focus on the technical challenge of  
18 combining and effectively integrating a coal gasification  
19 plant with a combined cycle power plant.

20 When you see this acronym IGCC, the CC is as  
21 important as the G. I sense, a lot of times, people focus  
22 on the gasification part of it. But it's really  
23 integrating those two pieces.

24 Today we have additional environmental drivers that

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1 really weren't at the forefront 10 or 15 years ago. And

2 these are things, like mercury and carbon dioxide which is  
3 relevant to climate change. These drivers are going to  
4 require us to integrate additional processes and  
5 improvements in equipment into the coal-based power plants  
6 of tomorrow.

7 You've probably heard a lot of about FutureGen in the  
8 context of a technology-based, mitigation strategy for  
9 climate change. That is, you've probably heard that  
10 FutureGen will produce and separate hydrogen and carbon  
11 dioxide using the hydrogen to produce electric power and  
12 then storing the CO-2 in deep saline aquifers.

13 When, when I mention that concept, a lot of times  
14 people ask me, is there enough underground storage capacity  
15 for all of the CO-2. And that's where this slide comes  
16 in. It pairs major CO-2 sources in North America with  
17 major CO-2 storage reservoirs.

18 You can see that we produce approximately 3.8  
19 gigatons a year of CO-2 and that there are 3,800 gigatons  
20 of geologic storage capacity. That is a thousand years of  
21 storage capacity in these geologic reservoirs. That should  
22 be more than enough given that we only have a 250-year  
23 supply of coal in North America.

24 FutureGen is currently estimated to cost 1.757

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1 billion dollars or we round that to 1.8 billion dollars.  
2 And that includes approximately 1.5, 1-and-a-half billion  
3 dollars to design and build the plant and the geologic  
4 storage facilities. It also includes \$300 million to  
5 operate those facilities for 3 years.

6 We estimate that FutureGen will generate about \$300  
7 million in electricity revenues during those 3 years which  
8 will be used largely to offset the cost of operating the  
9 plant. FutureGen is being implemented through a  
10 cooperative agreement between DOE and the FutureGen  
11 Industrial Alliance. The alliance consists of twelve coal  
12 mining and coal based power companies, and their corporate  
13 logos are all shown here.

14 Cooperative agreement or the contract, if you will,  
15 that I work from and the Alliance works from, is structured  
16 around six budget periods which are shown on this  
17 schedule. We recently transitioned from Budget Period  
18 Zero, which was project structuring and conceptual design,  
19 into Budget Period 1, or preliminary design.

20 Over the past year, you've read a lot of news  
21 articles; and, as you know, much work is centered on the  
22 site selection process and conceptual design of both the  
23 power plant and sequestration fuel.

24 But over the next year, some of that focus is going

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1 to shift toward selecting technology and equipment  
2 suppliers for major portions of the FutureGen Project.  
3 Design will continue into the spring of 2009. And  
4 construction will run through 2011, followed by shake down  
5 and start up.

6 We expect to begin commercial operations of FutureGen  
7 by the end of 2012. DOE and the FutureGen Alliance are  
8 splitting the project costs 74 to 26 percent. And we also

9 have international participation in the project. Foreign  
10 companies may, and have, joined the Alliance as equal  
11 members, while foreign government contributions are counted  
12 on the government side of the project ledger.

13 We hope to secure at least \$80 million from foreign  
14 governments at \$10 million each. And so far, four  
15 countries have announced their intention to join. Those  
16 countries being: India, South Korea, China, and Japan.  
17 And DOE is working to develop an international agreement  
18 that will facilitate their support.

19 Here's my contact information. Thank you for your  
20 kind attention. I look forward to hearing your comments  
21 later on.

22 (Applause.)

23  
24 MARK MC KOY: Next we would hear from Mike Mudd,

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1 the CEO for the FutureGen Alliance and discussing the  
2 project overview and update.

3 MIKE MUDD: Thank you. Good evening.

4 On behalf of the FutureGen Team, I want to thank you  
5 for coming out. It's fantastic to see such a large crowd  
6 here on such a wonderful summer evening.

7 I'd just like to remind you why we're here. We're  
8 all here because, in February of last year, the Alliance  
9 issued a RFP saying we have this wonderful project; who  
10 wants to bring FutureGen in their town. Twelve cities rose  
11 up in seven states and say we want FutureGen in our towns.  
12 We went through a very rigorous process, not based on  
13 politics but based on the quality of the proposals and  
14 quality of the sites.

15 Based on that process, we chose four sites. And this  
16 site is one of the sites here, which is why we are here.  
17 And the reason that we're here, also, is because of the  
18 hard work that was done by the Illinois FutureGen Team  
19 under the leadership of Jack Lavin and Bill Hoback.

20 The document that you see in the back, the  
21 Environmental Impact Statement, while there was a lot of  
22 work by the Department of Energy and by PHE, a lot of work  
23 was done by the people in this room as they dedicated  
24 themselves over the past year and a half to put together

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1 the necessary data to support the DOE with their very, very  
2 fast schedule.

3 So, I do want to say that it's a privilege and an  
4 honor to be here. I'm very impressed with support for the  
5 sites. I'm impressed with your state's. And I also want  
6 to mention that it takes not only the support here,  
7 locally, but the support in Washington. And I'd like, I  
8 have had the honor and privilege of meeting some of your  
9 wonderful congressmen. And while your whole congressional  
10 delegation is wonderful, Congressmen Shimkus, Costello and  
11 Johnson have been staunch supporters, not only of FutureGen  
12 but coal, but also coal in Washington.

13 And I want to publicly acknowledge the fact their  
14 important dedication toward this work is a testimony to  
15 your state.



23 This is a very unique opportunity to advance  
24 technology. We're going to push the envelope. Every piece

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1 of this plant. We're going to move the ball just a little  
2 further along than it has been. And putting all that  
3 together, this plant will be one of the cleanest that you  
4 have in the globe.

5 Because it is a research platform and because it is  
6 being put together the way it is, we are already ahead of  
7 what else is being done around the globe in this area.  
8 And, and it is our intention to stay there as we go  
9 forward. And because we have international participation  
10 in both the Alliance and in the DOE part of the  
11 organization, we are basically proving, or will prove, that  
12 you could do this anywhere in the globe.

13 Not to repeat what Tom said, we have twelve  
14 partners. Twelve of the largest companies are members.  
15 Twelve of the largest members in the world that are related  
16 to global coal mining as well as coal power production. We  
17 also have the involvement of the Department of Energy as  
18 both a partner as well as financially involved. And, as  
19 they said, they're bringing in other countries in there so  
20 that we get as much a breadth of coverage as we possibly  
21 can.

22 In addition to that, we have Battelle with us who is  
23 one of the leading R and D firms in the United States and  
24 some of those individuals have been here tonight to help

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1 talk about the technology and what we're doing.

2 We have engaged, globally, some of the best people in  
3 the world to understand every bit of what we're trying to  
4 do and to bring in ideas, solutions, or issues so that we  
5 do this thing right and do it right the first time.

6 And lastly, we just brought in the Washington Group  
7 as our engineering contractor. And they're starting to do  
8 design, which they'll talk about in a second.

9 So we're, we're advancing integrated gasification  
10 combined cycle technology, ICC technology. We're going to  
11 design it so we can operate on eastern and western coals.  
12 Illinois coals. We'll probably access coals from other  
13 parts of the globe, and it's a little bit different. But  
14 the idea is to be fuel flexible.

15 We're going to push, as I said, every piece of this  
16 thing so that the gasification technology is better than  
17 what we've seen in the past, that the gas turbines  
18 operating on hydrogen and at better levels and that we  
19 bring together other technologies that will actually help  
20 to enhance the facility.

21 We're going to integrate the CO-2 capture with the  
22 rest of the facility which has not been done. So, not only  
23 will we have a power plant with low emissions, but we're  
24 going to have them integrating with the CO-2 coming out as

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1 part of the process.

2 And lastly, we're creating a test bed with this plant  
3 so that we can test other technologies and so that we can  
4 get the opportunity at a commercial scale to try other

5 things.  
6 Um, from the standpoint of sequestration -- and again  
7 not to repeat what's already been said -- but we are  
8 focused on deep saline formations because they are so  
9 prevalent around the globe. And, as Tom said, you've got,  
10 we've got 3 or 4,000, there's 4,000 gigatons of storage in  
11 the United States which would represent a thousand years.  
12 But around the globe, we have at least 11,000 gigatons,  
13 which means that, if we can do it here and do it around the  
14 globe, we truly will impact on CO-2 use and our CO-2 goal  
15 as emissions in the world.

16 And we're building some of the most sophisticated  
17 models; and, and we're going to push the envelope on what  
18 we call monitoring the verification program to really  
19 understand what happens at 8,000 foot down in the CO-2. So  
20 the object is to really use this in a way where you can  
21 take it out and, again, repeat it and, and use it in other  
22 places.

23 We're moving from conceptual design to preliminary  
24 design. And, and we've looked at a variety of ways to

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1 build this plant. And we brought that down at the end of  
2 last year to three. And we did mass balances around those  
3 cost estimates. We, we built enough satisfaction or enough  
4 competence so we could actually do this plant from that  
5 basis. So we carried it to the next step. And now we're  
6 moving it down to a single design.

7 And we have Washington Group leading that effort. So  
8 we're taking all the work that we've done. Now we're  
9 focusing on making this a single plant that kind of goes  
10 and flows together.

11 And in the next week or so we'll be out in the market  
12 place starting to look for technology pieces and suppliers  
13 who will make up the components of the plant.

14 As Tom talked about the capital cost of the plans,  
15 about 1.5 billion. The other \$300 million was the cost of  
16 coal, which is during the operating side. So the same  
17 number is up there, 1.5 billion. Essentially the same  
18 schedule Tom showed you, that the key things to me are that  
19 in 2009 we will be in the ground digging. In 2012, we'll  
20 start the plant. So to do that, we need to carry the front  
21 end through and actually start, or finish the preliminary  
22 design and the final design within the next several months,  
23 next year.

24 What are we doing right now?

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1 Right now, we're doing preliminary design. Surface,  
2 subsurface. We're working out what technologies make the  
3 most sense and why. And we've got people going around the  
4 globe looking at what technologies are being used now that  
5 could fit and understanding the issue with those.

6 But we have been doing, as a lot of people in here  
7 know, a lot of work on site abilities. We have looked at  
8 this site about every way you can. And over the next  
9 several weeks, we will continue to do that, to really  
10 understand the goods, the bads and all parts of the site.  
11 And the four sites that we have to deal with are excellent

12 sites. And, and this is an extremely difficult decision.  
13 So to look at the site is, has been an extremely  
14 important.

15 We did come out with our guidance on our final  
16 offer -- which I'll talk about in just a second -- just in  
17 the last few weeks. And we have been supporting the DOE  
18 and, and the states and their activities on the EIS process  
19 and on these hearings.

20 Okay. So what are we doing right now that kind of  
21 affects, directly, here?

22 We came out on the 15th with guidance on the best and  
23 final offer that, it should lead to a proposal to us on  
24 August the 1st. The EIS process, right now, should get

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1 done about the end of August. And if it gets done at the  
2 end of August, we'll make a decision in November. Once  
3 that decision is made, the next day we will be on-site  
4 ready to start. So we're, we are planning to move as  
5 rapidly as we can to keep bringing this project forward.

6 So kind of a quick summary. The project is, is  
7 moving fast. We are essentially on track to where we're  
8 trying to go. And I've appreciated and we've appreciated  
9 all the help and support and the opportunity to kind of  
10 update you on what we're doing.

11 Thank you very much.

12 (Applause.)

13 MARK MC KOY: Thanks, Jerry. Thanks, Mike, for  
14 the update on the project.

15 Last August when we were here, I went over the most  
16 important elements of NEPA and tried to explain the process  
17 to you. I know that some of you here tonight maybe were  
18 not here then. I will go over, again, the most salient  
19 aspects of NEPA and then sort of let you know where we're  
20 at in the process.

21 NEPA stands for the National Environmental Policy  
22 Act. It is a federal law, federal statute. It became  
23 effective January 1, 1970. It applies to all federal  
24 agencies. It does not apply to state agencies or to local

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1 governments or to private individuals or private  
2 organizations. Only to federal agencies.

3 It has often been referred to as the National Charter  
4 for Protection of the Environment because it was the first  
5 step to broadly encompass environmental concerns.  
6 Basically, it promotes environmental considerations in the  
7 federal, decision-making process.

8 The NEPA mandate is that environmental information  
9 must be available to public officials and citizens before  
10 federal decisions are made and before federal actions are  
11 taken. It must be based on high-quality information.  
12 There should be scientific analyses, and those analyses  
13 should be accurate.

14 There is a requirement that federal agencies have an  
15 expertise in the relevant subjects, have an opportunity to  
16 review and comment on the document.

17 We also make the document available to state agencies  
18 and local government agencies for their review and

19 comments. And, of course, we are required to provide an  
20 opportunity for public involvement in the process.

21 And that's why we're here this evening at a public  
22 hearing. It's to invite comments from interested or  
23 effected persons and organizations on the Draft  
24 Environmental Impact Statement.

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1 Appropriate comments address the adequacy of the EIS,  
2 the merits of the alternatives where the proposed federal  
3 action is specially relevant to the environmental impacts.

4 We are in the middle of the process. We have  
5 prepared a draft document. That document has been  
6 distributed to the public so that the public can review the  
7 document. We will take all of the comments that we receive  
8 and address those comments in the final EIS. Then that  
9 final EIS will be distributed to the public. No sooner  
10 than 30 days thereafter, the DOE can issue a record at  
11 decision.

12 DOE does have some responsibilities in terms of  
13 addressing the comments. The DOE must consider comments  
14 both individually and collectively. DOE must respond to  
15 public comments in the final EIS by one of the following  
16 methods:

17 DOE can modify the alternatives.

18 DOE can evaluate alternatives not given previous, not  
19 previously given serious consideration.

20 DOE can supplement, improve, or modify analyses and  
21 make factual corrections.

22 Otherwise, DOE must explain why comments do not  
23 warrant further agency response.

24 We will take all of the substantive comments and

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1 include them in an appendix to the final EIS.

2 As I mentioned a moment ago, we are at the middle of  
3 the process. We are now holding the public hearings, as  
4 indicated there for June of this year. We hope to have the  
5 final EIS out to the public sometime in September of this  
6 year. If so, then we're able, perhaps, to reach a record  
7 of decision in October of this year.

8 DOE does want your participation. We take very  
9 seriously our responsibilities to provide for public  
10 participation, to get your input and your comments and your  
11 concerns over the proposed action.

12 Please send your written comments to me, the NEPA  
13 Document Manager, at Mail Stop N03, PO Box 880, Morgantown,  
14 West Virginia, 26507-0880. You can also send e-mails to  
15 FutureGen.EIS@NETL.DOE.GOV.

16 And, again, the comment period closes July 16. If  
17 you're sending regular mail to me, it must be postmarked by  
18 that date; although we will consider late comments to the  
19 extent that we can.

20 This is the time to begin the formal comment period  
21 when the public is invited to provide oral comments  
22 regarding the adequacy of the EIS, the merits of the  
23 alternatives and the proposed federal action especially  
24 relative to environmental impacts.

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1 For those of you providing oral comments, we ask that  
2 you keep your comments to within a 5-minute time frame.  
3 This allows us to make sure everyone has equal opportunity  
4 to provide comments. You may speak a second time after  
5 everyone has a first chance to speak.

6 It is important to make your views known, either now,  
7 in oral statements, or in writing. Again, you can use the  
8 comment cards that we have at the back. These comment  
9 cards have some check boxes where you can check if you want  
10 to receive a copy of the final EIS. You can check  
11 indicating that you want a hard copy or that you would like  
12 to receive a CD and a hard copy of the summary.

13 Please put your address on here so that we know where  
14 to send the document. If you would like to receive a copy  
15 of the Draft EIS which we have recently put out, just write  
16 into the comment session that you would like to receive a  
17 copy of the Draft EIS and, again, provide us with the  
18 address to mail it to. Put a postage stamp on the back;  
19 and, again, make sure you have these postmarked before  
20 July 16.

21 Again, all comments will be considered equally as we  
22 continue development of the Final EIS.

23 And I have a slide here with a few of the rules,  
24 again, to quickly go over them for making comments.

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1 Please, 5 minutes per speaker. I hope to be able to  
2 give people at least two opportunities to speak. So if you  
3 don't have enough time in the first 5 minutes, after  
4 everyone has a chance, I'll give people a chance to come  
5 back up.

6 Government officials and preregistered speakers go  
7 first, and I will open it up to the floor and invite other  
8 people to come up.

9 A transcript is being made. We have a court reporter  
10 here making a transcript; so, when you come up to speak,  
11 please provide your name. You may need to spell your  
12 name. Please speak clearly so that the transcript will be  
13 accurate. A copy of the transcript of this meeting will be  
14 available at the Mattoon Public Library within a few weeks  
15 and will be a part of the Final EIS.

16 The first commenter on the list will be Phil Bloomer  
17 representing US Representative Johnson.

18 PHIL BLOOMER: Good evening. Tim can't be here  
19 tonight. He'd much rather be here than where he is, which  
20 is in Washington, D.C. But this matters a great deal to  
21 him, so he asked me to come instead.

22 I was looking through the file on this project  
23 today. And I noticed that he'd been writing letters  
24 advocating for this since 2002. So it's been close to his

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1 heart for a long time. And it's good for Mattoon. It's  
2 good for this district. It's good for the nation and the  
3 environment for a lot of reasons. And the state folks here  
4 and the people from Mattoon have put all of those reasons  
5 down in voluminous and arcane and esoteric detail.

6 But one of the things Tim talks about a lot is that  
7 there are less quantifiable reasons for bringing a project

8 such as this here. And that has to do with the nature of  
9 the people who live and work here. There is a level of  
10 integrity and a work ethic that is part of our culture of  
11 the Midwest in Central Illinois. We're pretty proud of  
12 it. And we need to underscore that and tell these people  
13 that we're the best place for it to be.

14 So know that Tim Johnson is working on your behalf  
15 and let's put our best foot forward. I won't take any more  
16 of your time. This meeting this evening is for you to  
17 express your opinions not for public officials like me.  
18 They've all heard from people like me.

19 Thank you.

20 MARK MC KOY: Thank you.

21 The next commenter is Jack Lavin, Director of  
22 Commerce and Economic Opportunity speaking on behalf of the  
23 State of Illinois.

24 JACK LAVIN: Thank you, Mark.

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1 My name is Jack Lavin. I'm the Director of the  
2 Illinois Department of Commerce and Economic Opportunity.  
3 I am Governor Rod Blagojevich's point person on the  
4 FutureGen Project. And on behalf of Governor Rod  
5 Blagojevich, it's my pleasure to welcome, back to Illinois,  
6 the US Department of Energy officials, Mark McKoy and  
7 Tom Sarkus and the FutureGen Industrial Alliance, Mike Mudd  
8 and Jerry Oliver, to Illinois for another round of public  
9 hearing which are critical next step for this important  
10 selection process.

11 We have been actively engaged in this process for  
12 more than 4 years. And, as you can see, there is a high  
13 level of energy, buzz, and excitement surrounding FutureGen  
14 and its impact on our state, the country, and the world.

15 My many thanks to Mayor Charlie White and  
16 Angela Griffin, President of Coles Together, as well as all  
17 of today's attendees for their continued participation and  
18 enthusiasm throughout the process.

19 This has truly been a partnership, from the  
20 beginning, with local, state, and federal government.  
21 You've heard representatives from Senator Durbin and Obama,  
22 Congressman Shimkus, Phil Bloomer with Congressman  
23 Johnson's office, Congressman Costello and all of the  
24 delegation in Washington, D.C. are very engaged in this

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1 project.

2 I also want to recognize our state legislators, State  
3 Senator Dale Righter, State Representative Chapin Rose,  
4 have been very active in Springfield advocating for this  
5 project. And I want to thank them.

6 I also want to recognize Bill Hoback, the Director of  
7 the Illinois Office of Coal Development at DCO and his team  
8 who have been the resident experts and advocates for  
9 FutureGen.

10 And as a former coal miner, Bill Hoback, no one  
11 better understands the importance of clean coal technology  
12 and the significance of FutureGen. And everything I've  
13 learned about coal is from Bill Hoback. So, Bill, thank  
14 you and your team for all the hard work that you've done in

15 putting our application together and getting Mattoon and  
16 Tuscola into the final four.

17 I also want to recognize our partners in labor that  
18 are here. Alan Wente, with the Lincoln Land Building and  
19 Trades. Evan Sink with the United Mine Workers. The  
20 AFL-CIO has been very supportive in working with us in  
21 Springfield. Phil Vanette of the Illinois Coal  
22 Association. University of Illinois. Southern Illinois  
23 University. Eastern Illinois University. It's really been  
24 a great partnership.

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1 And I say this. FutureGen is, indeed, the future of  
2 energy. And I'm here today to tell you that Illinois is  
3 ready for FutureGen.

4 I say this to the Department of Energy, the FutureGen  
5 Industrial Alliance, the people of the State of Illinois  
6 and the folks at Mattoon and Tuscola, the foundation is  
7 poured. The house is built. And the table is set. We  
8 reached this point with quiet confidence and high  
9 anticipation. And we have benefited from the input of  
10 people from throughout Illinois, including planners,  
11 elected officials, business leaders, farmers, laborers and  
12 some of the top scientific and engineering talent from  
13 anywhere in the world.

14 There may be no economic development project in the  
15 history of this state that approaches the scope of  
16 FutureGen. And the local communities here at East Central  
17 Illinois and the hard-working people who live in Coles and  
18 Douglas counties have met every challenge along the way.  
19 This region wants to show the world how to use coal  
20 cleanly, to capture and store CO-2.

21 We have worked creatively, cooperatively on solutions  
22 to complex problems and nurtured each other as valued  
23 partners in this endeavor which will pay dividends for  
24 decades to come.

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1 We have said all along that Illinois is the place for  
2 FutureGen, based on the merit of the these two sites,  
3 alone. And I feel more confident of that today than of any  
4 time in the past. Some of the best minds in the state have  
5 helped us in reaching this stage. We have had top to  
6 bottom cooperation from government and private sector; and  
7 we wouldn't be here today if we didn't have absolutely the  
8 best local partners possible in Angela Griffin and  
9 Brian Moody and their respective FutureGen teams.

10 As we head down the home stretch, I'd like to  
11 reiterate all the distinct advantages Illinois offers  
12 FutureGen, starting with our geology. Illinois is blessed  
13 with the geology to demonstrate this breakthrough  
14 technology as well and probably better than anywhere in the  
15 United States, including our competitors in Texas.

16 We have deep, thick, porous sandstone reservoirs and  
17 the safety margin of at least two cap rock seals, never  
18 before penetrated. Illinois, in addition, offers a  
19 platform from a geology standpoint that will maximize the  
20 transferability and the FutureGen technology to cites  
21 throughout the United States and the world.

22 We have been examining and documenting this potential  
23 with the help of top scientists in this region for more  
24 than 3 years.

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1 From a water standpoint, both sites offer more than  
2 the ample water for FutureGen's needs and do so at a  
3 reasonable cost without negatively impacting current or  
4 future water supply in the region.

5 Our location. Among other advantages, our sites are  
6 almost ideally situated in relation to the nation's major  
7 coal fields, saving the Alliance millions of dollars every  
8 year in rail costs as well as further minimizing the carbon  
9 profile of the project.

10 Leadership. The project has garnered bipartisan  
11 support from elected Illinois leaders in Congress and in  
12 Springfield. And we, as a state, particularly under  
13 Governor Rod Blagojevich, have never lost faith in a long  
14 term potential for Illinois coal.

15 We have the research capacity. We have leading coal  
16 research institutions supporting Illinois' bid for  
17 FutureGen, including Southern Illinois University in  
18 Carbondale and our partner state, Indiana's Purdue  
19 University. Two of the top coal research centers in the  
20 nation.

21 And by the way, we do have the governor of Indiana's  
22 support. And we're working on and I think we have  
23 Kentucky's support. And we'll soon have other states'  
24 support.

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1 And we have the University of Illinois, premier  
2 research university with the Number 4 Engineering Program  
3 in the country; and right in our own, right in our backyard  
4 here, a top state university at Eastern Illinois  
5 University.

6 Illinois' investment package includes an unmatched  
7 \$17 million grant to the FutureGen Alliance. In addition,  
8 we have committed the Illinois State Geological Survey and  
9 some of the nation's top scientists in their field to  
10 oversee the long-term monitoring of CO-2 once it is  
11 captured and stored. In addition, we have low-interest  
12 loans through our Illinois Finance Authority and various  
13 tax credits through our Enterprise Zones.

14 As I have emphasized, as I emphasized at the last  
15 round of FutureGen hearings, Illinois is a coal state, not  
16 an oil and gas state. We have demonstrated our belief in  
17 coal through investments of millions of dollars in the  
18 development and deployment of clean coal technology. We  
19 have, in the past several weeks, permitted the first two  
20 coal gasification projects to be advanced anywhere in  
21 America in the past 20 years. And we are very close to  
22 permitting and breaking ground on the gasification project  
23 in far northwestern Illinois that will make nitrogen  
24 fertilizer from coal and quite significantly begin

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1 producing for US consumption the first low-sulfur, diesel  
2 motor fuel made from Illinois coal.

3 The fundamentals for FutureGen are in place. Water,

4 geology, location, economics, research, political  
5 leadership and community support with all of you here  
6 tonight.

7 With science on our side and all of these strategic  
8 assets, we are confident that the world's cleanest coal  
9 plant will be built in our state and be successful.

10 It is a marriage made in heaven. We're all here  
11 today because we share in this vision and we believe in the  
12 possibilities of this facility to change the way we look at  
13 energy production.

14 And as I have said many times, FutureGen needs  
15 Illinois; and Illinois needs FutureGen.

16 Thank you very much for all of you being here  
17 tonight.

18 (Applause.)

19 MARK MC KOY: Thank you Jack.

20 The next commenter on the list is State  
21 Representative Chapin Rose.

22 CHAPIN ROSE: Welcome. Welcome to Illinois.  
23 Welcome to chairmen and advisors. It was nice to talk to  
24 you earlier. Welcome to this wonderful school here in

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1 Mattoon.

2 We are very excited to have you here this evening,  
3 and I know that Director Lavin is going to talk a lot about  
4 really the team effort that's gone into FutureGen  
5 Illinois.

6 I represent both sites in both locations; and  
7 unfortunately, this may be my only opportunity to address  
8 the crowd. Because we're due back at Springfield tomorrow  
9 through Saturday; so I may not be in Tuscola.

10 I want to take just this quick opportunity to  
11 highlight a few of the items that Jack talked about. The  
12 geology is here. The technology is here. And the coal is  
13 here. And I know Jack just did it much more eloquently  
14 than I can, but let's just take a look around East Central  
15 Illinois and look at what we have to offer.

16 We've got wonderful schools. We have wonderful  
17 health care opportunities. You have diversity. Lakeland  
18 College. Our new interim president from Lakeland is  
19 sitting back here, Scott Lensink is here tonight. You've  
20 got the University of Illinois to the north; and, of  
21 course, you've got Southern Illinois and their coal  
22 research center. All of these resources are at your  
23 disposal. And I will do everything I can to help make the  
24 state resources be at your disposal.

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1 This, truly, has been a team effort. In my 5 years  
2 in Springfield, I've never quite seen anything like it.  
3 Having grown up a short ways from here in Charleston, a  
4 little over ten miles to the east, we've even got  
5 Charleston and Mattoon working together in a team  
6 partnership to bring FutureGen to East Central Illinois.

7 We are very excited to have you. I want to close,  
8 just briefly, by saying some quick thank yous, primarily,  
9 to Angela and Brian from Tuscola and Mattoon and  
10 Phil Hoback, Director Lavin, and Governor Rod Blagojevich.

11 We are very excited to have you here.  
12 The geology is here. The technology is here. The  
13 coal is here. We want FutureGen to be here in Illinois.  
14 Thank you very much.

15 (Applause.)

16 MARK MC KOY: The next commenter is Ann Short,  
17 Mayor of Sullivan.

18 ANN SHORT: Good evening. I want to welcome you  
19 all to Central Illinois, again. I am Ann Short. I'm the  
20 Mayor of Sullivan; and that's located just 15 miles down  
21 Illinois Route 121, right on the proposed site in Mattoon.  
22 And as mayor, I want to express to you support of the City  
23 Council and the citizens of Sullivan for the construction  
24 of FutureGen at that site.

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1 I'm also a member of the Sullivan Chamber and  
2 Economic Development Board, which also supports the  
3 construction of FutureGen here. Both these organizations  
4 feel that locating the site in Illinois would be a  
5 tremendous plus for Central Illinois.

6 However, locating it in Mattoon would be a great  
7 benefit for the Sullivan community. The Sullivan community  
8 can offer the employees of FutureGen, both in construction  
9 and long term, the opportunity for first-class recreation  
10 at our Lake Shelbyville. We can also offer cultural  
11 entertainment through our Little Theater on the Square,  
12 which is a professional equity theater who offers  
13 performances year-round. And we also have available  
14 housing opportunities in Sullivan and have a first-rate  
15 school system that can accommodate many new students.

16 The Sullivan community believes that there will be an  
17 economic opportunity for current businesses to expand and  
18 for the development of new businesses to serve the needs of  
19 the FutureGen operation. The Sullivan Chamber and Economic  
20 Development Board is working with our local businesses to  
21 determine what products and services we can provide for  
22 FutureGen and encouraging those businesses to be ready to  
23 step forward when the site is selected.

24 Again, we're thrilled that you have chosen these

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1 sites in Illinois; and we hope to see you return soon with  
2 a positive decision.

3 Thank you.

4 (Applause.)

5 MARK MC KOY: The next commenter is  
6 Angela Griffin with Coles Together.

7 ANGELA GRIFFIN: On behalf of Coles Together,  
8 the City of Mattoon, again, welcome to everyone tonight.

9 Of course, it's always good to see the Mayor, the  
10 Honorable Charlie White. Mayor, thank you for your  
11 leadership on this important project. And it's important  
12 to remember that John Inyart, the Mayor of Charleston and  
13 Charleston City Council has provided important leadership  
14 on the project, as well.

15 As Mr. McKoy, explained, we're here tonight to take  
16 comments on the Draft Environmental Impact Statement that's  
17 been published. The Mattoon team has had an opportunity to

18 review the Environmental Impact Statement, and we have  
19 found it to be extremely thorough in its analyses.  
20 The conclusions and the impacts reported appear to be  
21 based on adequate documentation and supporting data. We  
22 also found it to be consistent with the data that we  
23 generated when we were doing our own research and testing  
24 and providing information for the environmental impact

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1 volumes which were used in producing the Environmental  
2 Impact Statement.

3 But we're here tonight to hear your opinions of the  
4 environmental impact statement. We encourage you to use  
5 this opportunity to express your views and ask questions.  
6 We're committed not only to the integrity of this project  
7 but also to the integrity of this process, and your  
8 participation tonight will help maintain both.

9 Thank you for coming out, and thank you for your  
10 support.

11 (Applause.)

12 MARK MC KOY: The next commenter on the list is  
13 Kent Metzger.

14 KENT METZGER: Good evening. Thank you. My  
15 name is Kent Metzger, and I am a neighbor to FutureGen and  
16 also a supporter of FutureGen. So I want to, first, thank  
17 you for the opportunity to speak and give me an opportunity  
18 to review the report.

19 I have one comment on the report, and then I want to  
20 go into some other things and my thoughts on the, on  
21 FutureGen.

22 In the report, under the climate section, it said  
23 that all four sites subject to permanent drought and severe  
24 drought. I think there's an issue of magnitude of scale

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1 there. What's a drought in Illinois is a wet season in  
2 Texas. And, when it comes to water and availability, I  
3 think Illinois has Texas hands down on water.

4 As you can see, we're kind of in a drought right now;  
5 and the corn is 6, 7 feet tall and starting to tassel. And  
6 if there was a drought in Texas right now, the sagebrush  
7 would be dead, so.

8 Also, I believe that Odessa, Texas, the evaporation  
9 rate is about three times what it is in Mattoon and  
10 Tuscola. And Jewett, Texas is about twice that. So, even  
11 when we get the rain, at least we can hang on to it here in  
12 Illinois.

13 I want to give you a couple perspectives as a  
14 neighbor. And not only am I a neighbor, but I'm also an  
15 engineer, have a couple of businesses here in town, one  
16 engineering firm, one contracting firm. My background is  
17 in mining and engineering. I've worked in the coal  
18 industry and been in the consulting business for 19 years  
19 now. So I've got a little bit of technical experience when  
20 it comes to these issues.

21 But some of the issues that came up and I think are  
22 concerns as, as neighbors and as people in the community  
23 is, 1. What's this place going to look like? Esthetically,  
24 is it going to be a pleasing site?

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1           And I would hope -- and I throw this out there to  
2 everyone involved -- that since this is going to be a show  
3 place for technology, that it also be a show place that is  
4 esthetically pleasing to the community. If we're going to  
5 be bringing world travellers in to check this facility out,  
6 we want them to be impressed with your facility and our  
7 community, as well. We're going to do our best to make you  
8 proud of our town.

9           In reviewing the report, I noticed that there was  
10 going to be a 250-foot high stack. You know, in corn  
11 country that sounds like a pretty tall, tall stack. So I  
12 went around, and I tried to figure out what in the area is  
13 250 feet high.

14           A mile-and-a-half northwest of the site there's a  
15 grain elevator at Coles Station. And that elevator is  
16 about a hundred and eighty feet tall. I don't think a  
17 250-foot stack, a mile-and-a-half from a hundred eighty  
18 foot high grain elevator is really going to stand out, so.

19           And then as I drove around the area and if you go out  
20 in the parking lot here tonight on the way out and you look  
21 to the northwest, you can't even see that grain elevator.  
22 Because, even though we think we live in flat corn country,  
23 there is topography here and there are trees here. So,  
24 esthetically, I don't think that's going to be an issue. I

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1 think people will become, it's going to become so common  
2 place seeing a stack that they'll be oblivious to it. I  
3 think probably most of the people that came in on 121  
4 didn't notice that grain elevator that is a hundred eighty  
5 feet tall. So I think that's the one issue that, that  
6 we'll just come to grips with and will get common place to  
7 see it.

8           Another issue is, I know people are going to be  
9 upset, we're taking crop production out and we're going to  
10 build a plant there. You know, one of the things we're  
11 going to replace that field with is a lake. And most  
12 people don't really mind looking at lakes. And it's going  
13 to be a good-sized lake. So, you know, probably 40 or 50  
14 acre region.

15           Another issue, esthetically, is high-tension  
16 transmission lines. I also challenge everybody in this  
17 room to name the number of high-tension transmission lines  
18 they saw on the way to the school tonight. And there are  
19 some within eyesight. If I looked out the window right  
20 now, I could see them. People don't notice these things.  
21 Esthetically, they're common place.

22           Another issue, noise. You know from the new journey  
23 point, there are a lot of ways to handle noise. And I'm  
24 sure that those will come into consideration with this

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1 plant. If we're going to dig a 450 acre lake, we're going  
2 to have plenty of dirt to build berms to attenuate that  
3 noise.

4           And where I live, a-mile-and-a-quarter west of the  
5 property, I live in a wooded area. And I can say, without  
6 a doubt, that in the winter it's louder in my yard than it

7 is in the summer. It's because there are trees there, and  
8 those trees block the noise. So we throw up a berm -- I  
9 think that sounds easy -- we put a berm in with the plants  
10 and trees. We're in control of the noise with natural  
11 features.

12 In my experience working in the coal mines, I know  
13 there are different ways to handle coal, some are noisier  
14 than others. I hope that the methodology we use are the  
15 quietest methods possible. We don't have to clang cars  
16 together to dump them. They can be placed on a, and  
17 pivoted while they're all connected. You don't have that  
18 loud banging and this and that.

19 And we have a coal, we have a train track right  
20 there. And I feel my house rumble every once in a while.  
21 And that's going to continue. But you know it's going to  
22 continue whether this plant is there or not. So the  
23 benefits outweigh the problems with having more trains.

24 Another issue is site lighting and light pollution.

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1 We live in the country. We like living in the country.  
2 But there are ways, engineering ways, to control that light  
3 to avoid as much light pollution as possible to where it's  
4 minimum.

5 Another issue is roads and traffic. You know, I  
6 touched on the train issue. We have trains. We'll have a  
7 few more trains, probably three trains a week. I think  
8 three trains a week is a good trade off for what we're  
9 going to get out of this plant.

10 And we're going to have trucks. And, during  
11 construction, we're going to have a lot of trucks. But, as  
12 I was looking around the area, the 200 East Road, which is  
13 the east property line of the property, it's an asphalt  
14 road. It's going to handle a lot of traffic. We're going  
15 to have a lot of dirt and dust from the road traffic.  
16 Obviously, we're going to have some dirt and dust during  
17 construction. That what water trucks are for. And that's  
18 the way construction sites work. So we can come to grips  
19 with that.

20 And another issue is community safety. And they're  
21 going to be generating some chemicals there and some  
22 materials on-site which are potentially hazardous. But,  
23 again, we're used to being around those things. We take  
24 them for granted.

0045

1 This school is within 3/4 of a mile of at least three  
2 manufacturing facilities where they handle materials that  
3 could be harmful to us as citizens.

4 There is also an anhydrous ammonia plant within a  
5 very short distance of that. One of the most dangerous  
6 chemicals in our area is anhydrous ammonia. And we're so  
7 used to it that we don't even take it into consideration a  
8 lot of times. If you speak with the fire fighters and they  
9 talk about dealing with chemical control in an accident,  
10 ammonia, ammonia is one of the biggest things they have to  
11 be concerned with.

12 And, also, explosion. Everybody says it's going to  
13 blow it up. It's going to take out the school and this and

14 that.  
15 The other, one of the most common explosion hazards  
16 in our area or in the world is grain dust explosion.  
17 Again, we're used to that. There are risks in everything  
18 we do, but I believe that FutureGen beyond payment and  
19 technology is also going to be faded as taking care of our  
20 area and the safety of our people.

21 So, with that, thank you.

22 (Applause.)

23 MARK MC KOY: The next commenter on the list is  
24 Tom Donnell, Local Affairs Committee, Coles County Farm

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1 Bureau and farmer.

2 TOM DONNELL: Thank you. I'll try to be brief.  
3 I've had a long day. I buried my very best friend of 53  
4 years today, but I feel so strongly about this project that  
5 I came here tonight.

6 There are some other farmers in the audience that  
7 will speak in event we have a lot of negative talkers.  
8 Otherwise, I'll be the only farmer, I guess, that will be  
9 speaking. They allowed me to speak, because I like to  
10 talk.

11 Okay. The EIS states that 200 acres of farmland will  
12 be converted for use for the power plant site. As a farmer  
13 and a member of the Coles County Farm Bureau, I have no  
14 objection to this, particularly in light of the fact that  
15 the use is to construct and demonstrate that we could use  
16 coal efficiently without contributing to greenhouse gas  
17 emissions.

18 Keep in mind that a lot of this land can still be  
19 used for farm services. Also, for anyone who is concerned  
20 about loss of farmland, putting the project in Mattoon  
21 ultimately converts less farmland because Mattoon is the  
22 only proposed site that can accommodate the injection well  
23 on-site for the CO-2.

24 Almost everything has been covered here tonight

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1 except one thing; and Mr. Oliver stated this or touched on  
2 it when he spoke. Mr. Oliver stated that we, that we want  
3 to use this technology around the globe in all types of  
4 weather and all climates, South Africa, India, China, South  
5 Korea, Japan. You name it.

6 300 days ago I spoke here and I brought up something  
7 very important. Illinois has different types of weather.  
8 We have extreme cold. We have extreme hot and humid. Our  
9 competing state has the same type of weather all the time.  
10 The same boring, long weather all the time.

11 (Laughter.)

12 So if we want to prove that this can be used around  
13 the world, we need to locate it in Illinois.

14 I am really amazed at the folks that put together the  
15 Environmental Impact Statement. In 21 simple page, they  
16 put a lot of information in here. But looking at this  
17 statement, I have to wonder why we have to bother to hold a  
18 hearing here tonight; because, obviously, the two Texas  
19 sites just don't qualify.

20 (Laughter.)

21 Read the statement and you'll see what I mean.  
22 It has to be either Mattoon and or Tuscola; and  
23 Mattoon is slightly ahead of Tuscola.  
24 (Laughter.)

0048

1 Gentlemen, I do hope that you let Mr. Nolte get his  
2 corn harvested before we start construction; but let's  
3 start construction soon.  
4 Thank you.  
5 MARK MC KOY: The next commenter is Jim McShane,  
6 Crossroads Workforce Investment Board.  
7 MARK MC SHANE: Thank you for this opportunity  
8 to comment. The Crossroads Workforce Investment Board  
9 happens to cover 14 counties which includes both  
10 locations. And the board is very excited about the  
11 opportunity that's here that we can see develop in our  
12 area. We're concerned about having enough folks that are  
13 trained in order to build this project. And, working with  
14 the trades, we've supported some of what they're doing to  
15 recruit. We're looking at the job potential and also the  
16 income generation that this will help in our region.  
17 And I really appreciate the leadership Jack Lavin has  
18 had on the state end and the local team that has really put  
19 a lot of work into this. And we want to be big supporters  
20 of this. Our board supports this a hundred percent.  
21 Thank you.  
22 (Applause.)  
23 MARK MC KOY: The next commenter on the list is  
24 Phil Gonet, Illinois Coal Social.

0049

1 PHIL GONET: Good evening. My name is  
2 Phil Gonet. I'm the President of the Illinois Coal  
3 Association.  
4 On behalf of our industry, I enthusiastically welcome  
5 you to our state. We, in the coal industry, are very  
6 excited about this project. As you may know, you may not  
7 know, and I wanted to bring in a few facts that may not be  
8 covered in your Environmental Impact Statement, about  
9 coal.  
10 We have a long history of safe and successful coal  
11 mining here in Illinois. The first commercial coal mining  
12 actually started in 1810 in Jackson County. And by the  
13 1880's, coal mining was well established and fueling the  
14 power needs of both Chicago and St. Louis.  
15 The Illinois Coal Association, by the way, started in  
16 1878; so we have a long history here. But even more  
17 impressive than our history is the abundance of coal. And  
18 I'm sure you know that. But I'm not sure everyone in the  
19 audience knows that's here tonight.  
20 We are known as the Saudi Arabia of coal. In fact,  
21 the energy content of our coal is greater than the energy  
22 content of the oil in Saudi Arabia and Kuwait combined. As  
23 you probably know from the Illinois State Geological  
24 Survey, our coal reserves, recoverable reserves are over

0050

1 100 billion tons of coal.  
2 And to put that in a perspective, one of the earliest

3 speakers talked about how much capacity we have in the  
4 United States to store CO-2. To give you an example of how  
5 much coal we have in Illinois, our country used 1.1 billion  
6 tons of coal last year. So we, in Illinois have enough  
7 coal to power this country for the next 100 years. So this  
8 is an abundance of coal here in Illinois you find nowhere  
9 else in the country. One other state, Montana, which is  
10 not in the running for this project, actually does have  
11 more coal than us in Illinois.

12 So this project is important to Illinois. It's  
13 important to the economy of the United States. That's one  
14 thing that hasn't come up tonight, the economic value of  
15 energy to this country. 52 percent of our energy in the  
16 United States, right now, comes from coal. And we need to  
17 find a way to burn that coal more cleanly and more  
18 environmentally friendly. And this project will do this.

19 So, to mirror the slogan that the Department of  
20 Commerce and Economic Opportunity has come up with:

21 The state needs FutureGen. The country needs  
22 FutureGen. In fact, the world needs FutureGen. But  
23 FutureGen needs Illinois.

24 So we welcome you here, and we hope to have you

0051

1 back. Thank you.

2 (Applause.)

3 MARK MC KOY: The next commenter on the list is  
4 Larry Lilly, Mattoon Schools.

5 LARRY LILLY: Good evening. My name is  
6 Larry Lilly; and as Superintendent of the Mattoon schools,  
7 I am pleased to publicly welcome representatives of  
8 FutureGen and all of you to Riddle Elementary School.

9 As you can imagine, we are extremely proud of our  
10 wonderful educational facilities here in Mattoon. In 2003,  
11 we opened this beautiful elementary school along with  
12 Williams Elementary School which is an identical building  
13 on the other side of town.

14 Over the past 2 years, we've completed extensive  
15 remodel of Mattoon High School and are now in the process  
16 of our final building upgrades to our middle school.

17 Our facilities were built and renovated with  
18 community growth in mind and we believe are among the  
19 finest in the state. As a result, Mattoon schools are now  
20 in the position to welcome an influx of FutureGen families  
21 and their children to our 21st century classrooms.

22 We invite you to tour our facilities and meet our  
23 staff and talk with our parents and students. In so doing,  
24 we are confident that you will be impressed with the warm,

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1 caring, learning atmosphere in Mattoon schools.

2 Please know that we are ready to partner with  
3 FutureGen, your employees, and your, and their children.

4 We thank you for this opportunity and appreciate all  
5 you coming out tonight.

6 (Applause.)

7 MARK MC KOY: According to my list all  
8 registered commenters have now had a chance to speak. If  
9 you registered and I failed to call your name, please let

10 me know now.

11 Okay. We can now hear from unregistered commenters.  
12 Are there any other people who would like to provide  
13 comments?

14 Come on up. Please state your name for the record.

15 JOHN TAYLOR: My name is John Taylor. I'm a  
16 lifelong resident of Mattoon. As a matter of fact, I just  
17 live 7 blocks straight down Western Avenue. I've been  
18 there for 35 years.

19 I represent the International Brotherhood of  
20 Electrical Workers Local 146 out of Decatur. I would like  
21 to assure the FutureGen Alliance gentlemen and the  
22 Department of Energy that, if you so elect to use the  
23 Mattoon site, which we hope that you do, we have a highly  
24 qualified, skilled labor source for electrical workers.

0053

1 Our local union has built a 2-unit power plant in Coffeen,  
2 Illinois, for Ameren CIPS approximately 40 years ago.

3 We also built a 2-unit fossil plant at Kincaid,  
4 Illinois, for Commonwealth Edison. That was done in the  
5 60's and 70's. And then, low and behold, the new  
6 technology caught up with us too. We built a single-unit  
7 nuclear plant at Clinton, Illinois. And we have 650  
8 electricians just champing at the bit to come in and do  
9 this work for you.

10 And I kept waiting for someone from the building and  
11 trades to stand up here and speak representing organized  
12 labor. And, if there's anyone in the crowd, they've waited  
13 me out. So, I guess I ended up with the duty.

14 But we would welcome you. We're looking forward to  
15 working with you. And anything we can do, at all, to  
16 assist, we will do that. Give you a good job, efficient  
17 job and a quick job.

18 And thank you for your comments.

19 (Applause.)

20 MARK MC KOY: Who would like to comment next?

21 Now, we did take seriously getting comments from  
22 people regarding the project. We want to make sure  
23 everyone has an opportunity to tell us about their  
24 concerns, if they have concerns about the projects. In

0054

1 some cases, people want to see changes in the proposed  
2 action. In other cases, maybe people do not want the  
3 project at all. We need to hear all the comments that  
4 people would have.

5 Earlier this evening, I was talking with one  
6 gentleman. He wanted to know how would the mercury be  
7 handled that's captured at the facility.

8 It's a very good question, how it would be handled  
9 when we get further into the process where we have  
10 information on the manufacture of the activated charcoal  
11 filters that would be used. And we could probably get  
12 answers for how that would be handled.

13 He was also asking about lead, about arsonic. These  
14 are other metals that could be captured. So we'll have to  
15 investigate this further. I thought it was a very good  
16 question to bring up. But, you know, I'm sure I didn't

17 hear all the comments, all of the concerns that people  
18 had. I wish I had a chance to go around to each one of you  
19 and talk with you individually. But the other way to do it  
20 is for you to come up now and provide oral comments.

21 (No response.)

22 Okay. Nobody wants to give us their concerns. Do we  
23 have anybody else that wants to give us their support?

24 (No response.)

0055

1 MARK MC KOY: You know, this afternoon I gave  
2 some -- Come on up.

3 State your name for the record.

4 KENT METZGER: My name is Ken Metzger, again.  
5 And I didn't want to make any comments. But one thing  
6 that's come up, you know, to get this is, I think, if some  
7 of you could speak with Angela if they have any ideas. But  
8 part of this process is to come up with a way to get rid of  
9 some of these by-products. Because they're actually useful  
10 in other chemical processes and whatnot.

11 So, if any, this is a big group and a lot of minds  
12 out there, a lot of good minds out there, if you can think  
13 of something, a use for the CO-2 or the hydrogen or what  
14 not, I think that would be very helpful for them to put  
15 together a package to make a bigger presentation as to  
16 another thing we can provide for the team.

17 So, thank you.

18 (Applause.)

19 MARK MC KOY: Do we have anyone else who would  
20 like to provide comments? Make sure you waive your hand  
21 wildly so that I see it.

22 You know earlier this afternoon I was doing an  
23 acknowledgment or recognition for the team, Potomac-Hudson,  
24 Tetra Tech, Louis Berger that prepared the EIS; but the EIS

0056

1 is based on information that was submitted by the site  
2 proponents. That is, for each one of the sites, the local  
3 teams prepared environmental information that, provided us  
4 not just the base level information that we needed. The  
5 teams here in Illinois, the Mattoon team, the Tuscola team,  
6 did an outstanding job in providing that information to us.

7 And we had requested that a draft document be  
8 provided to us early in the process so that we had  
9 something to work with early.

10 The two Illinois teams submitted to us documents that  
11 were well advanced. And we were able to move forward very  
12 significantly with the documents that they provided us at  
13 that time. Had they not provided those documents timely  
14 with as much information as they provided, we could not  
15 have gotten the documents together in a final draft EIS for  
16 your review as quickly as we did.

17 These teams have shown leadership. They have shown a  
18 tremendous work ethic. I have seen work ethic in the  
19 people in this community, and you certainly are to be  
20 commended for it.

21 (Applause.)

22 MARK MC KOY: Do we have anyone else who would  
23 look to provide some comment?

0057

24

(No response.)

1 Don't want to really end this public hearing too  
2 soon. I'm afraid people are going to inundate me with  
3 questions afterwards. And I'm happy to talk with you one  
4 on one, you know, if you want to talk with me after the  
5 hearing is over.

6 Again, it's very difficult for me to capture all of  
7 it and write notes down from you. Either write down  
8 comments on the comment card and hand those in or come up  
9 and provide an oral statement. That allows us to capture  
10 the comments.

11 Yes, sir. I saw you raising your hand. Please state  
12 your name for the record.

13 JIM BELL: My name is Jim Bell. I am a neighbor  
14 to the proposed FutureGen site. And my views are contrary  
15 to most all that have been stated here this evening. You  
16 know, I'm one of these guys, it's not in my backyard, you  
17 know. Mr. Metzger, back here, is a neighbor of mine. And,  
18 you know, he makes a lot of points that possibly could kind  
19 of gloss over some of the problems with a facility like  
20 this, if that be done. And I have no assurance that those  
21 things will be done at this point.

22 Nearly everyone that commented up here had something  
23 to gain this evening. I have a lot of neighbors that, you  
24 know, they don't really want to speak out against the

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1 community. And I don't really want to either, but we do  
2 have concerns out there as neighbors, for health and  
3 esthetics and just our daily living, you know. And I guess  
4 that's about all I have to say. So, thank you.

5 (Applause.)

6 MARK MC KOY: Do we have anybody else who wants  
7 to come up and provide comment?

8 Anyone who spoke earlier who wants to come up a  
9 second time?

10 (No response.)

11 Okay. I won't belabor this further. Thank you for  
12 your comments and participation. Remember that you may  
13 submit comments until July 16, 2007.

14 This concludes the Public Hearing for the FutureGen  
15 Project. Let the record show that this hearing adjourned  
16 at 8:28 p.m. Thank you.

17 -----  
18 Which were all the proceedings had and entered  
19 of record at the Department of Energy's public scoping  
20 meeting for the FutureGen Project.

21

22

23 STATE OF ILLINOIS )  
 ) SS  
24 COUNTY OF DOUGLAS )

0059

1 C E R T I F I C A T E  
2 I, Susan Bursa, a Notary Public and Certified  
3 Shorthand Reporter, do hereby certify that on the said date  
4 the foregoing proceedings were taken down in shorthand by

5 me and that the foregoing transcript contains a true and  
6 accurate transcription of all such shorthand notes.  
7 I further certify that I am a disinterested  
8 party to the proceedings herein and that I am not a  
9 relative of any of the parties hereto, that I am not in the  
10 employ of any of the parties hereto, and am not otherwise  
11 interested in the outcome of this hearing.  
12 In witness whereof, I have hereunto set my hand  
13 and affixed my seal this 14th day of July, A.D. 2007.

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Notary Public and  
Certified Shorthand Reporter  
License No. 084-3615.

1 **Errata for the Transcript of**  
2 **the U.S. Department of Energy**  
3 **FutureGen Public Hearing**

4  
5 **June 28, 2007**  
6 **Tuscola Community Building**  
7 **Tuscola, Illinois**  
8

9 Acronyms Used

- 10 CD – Compact disc  
11 DOE – U.S. Department of Energy  
12 EIS – Environmental Impact Statement  
13 IGCC – Integrated Gasification Combined Cycle  
14 NEPA – National Environmental Policy Act  
15 NETL – National Energy Technology Laboratory  
16 R&D – Research and development  
17  
18 Page 0000  
19 Line 7 – Delete “A.D.”  
20 Page 2  
21 Line 1 – Change “MC KOY” to “McKOY”  
22 Page 6  
23 Line 7 – Change “R and D” to “R&D”  
24 Page 12  
25 Line 23 – Change “MC KOY” to “McKOY”  
26 Page 23  
27 Line 24 – Change “MC KOY” to “McKOY”  
28 Page 26  
29 Line 23 – Change “N-03” to “N03”  
30 Page 30  
31 Line 7 – Change “MC KOY” to “McKOY”  
32 Page 36  
33 Line 24 – Change “MC KOY” to “McKOY”  
34 Page 39  
35 Line 9 – Change “MC KOY” to “McKOY”  
36 Page 41  
37 Line 10 – Change “MC KOY” to “McKOY”  
38 Page 42  
39 Line 11 – Change “1950’s” to “1950s”  
40 Page 44  
41 Line 13 – Change “MC KOY” to “McKOY”  
42 Page 45  
43 Line 19 – Change “MC KOY” to “McKOY”  
44 Page 47  
45 Line 6 – Change “MC KOY” to “McKOY”  
46 Page 48

- 1           Line 15 – Change “MC KOY” to “McKOY”
- 2   Page 49
- 3           Line 12 – Change “MC KOY” to “McKOY”
- 4   Page 51
- 5           Line 21 – Change “MC KOY” to “McKOY”
- 6   Page 52
- 7           Line 22 – Change “MC KOY” to “McKOY”
- 8   Page 54
- 9           Line 17 – Change “MC KOY” to “McKOY”
- 10   Page 56
- 11          Line 1 – Change “MC KOY” to “McKOY”
- 12   Page 59
- 13          Line 2 – Change “MC KOY” to “McKOY”
- 14   Page 60
- 15          Line 13 – Change “MC KOY” to “McKOY”
- 16   Page 64
- 17          Line 18 – Change “MC KOY” to “McKOY”
- 18   Page 65
- 19          Line 18 – Change “MC KOY” to “McKOY”
- 20   Page 66
- 21          Line 19 – Change “MC KOY” to “McKOY”
- 22   Page 67
- 23          Line 24 – Change “MC KOY” to “McKOY”
- 24   Page 74
- 25          Line 6 – Change “MC KOY” to “McKOY”

1 STATE OF ILLINOIS )  
 ) SS  
2 COUNTY OF DOUGLAS )  
3

4 PROCEEDINGS

5  
6 The proceedings taken on the 28th day of June,  
7 2007 A.D., IN RE: DEPARTMENT OF ENERGY PUBLIC HEARING FOR  
8 THE FUTUREGEN PROJECT, taken at 7:00 p.m., at Tuscola  
9 Community Building, 122 West Central Avenue, Tuscola,  
10 Douglas County, Illinois, before Susan Bursa, C.S.R., a  
11 Notary Public of Douglas County.  
12

13 PRESENT:

14 Mark McKoy  
15 DEPARTMENT OF ENERGY  
16 NEPA DOCUMENT MANAGER  
17  
18  
19  
20  
21  
22

23 Susan Bursa, C.S.R.  
24 709 Lincoln Place  
Arthur, Illinois 61911

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0002

1 MARK MC KOY: Welcome to the Department of  
2 Energy's Public Hearing for the FutureGen Project. Let the  
3 record show that the hearing began on June 28, 2007, at  
4 7:06 p.m., at the Tuscola Community Building in Tuscola,  
5 Illinois.

6 As part of this compliance with the National  
7 Environmental Policy Act, the DOE has produced a Draft  
8 Environmental Impact Statement or EIS. This document  
9 analyzes the potential environmental impact at the  
10 alternative sites for the proposed FutureGen Project. Both  
11 the document and the comments received should help the DOE  
12 in making better informed decisions.

13 The draft EIS has been distributed to persons who  
14 have previously expressed some type of interest in the  
15 project. If you previously requested a copy of the  
16 document and have not received it, please provide your name  
17 and mailing address to Robin Griffin. Robin, where are  
18 you? Right there. And indicate the form in which you  
19 would like to receive the document.

20 Also there are comment cards available that can be  
21 used to request a copy of the draft EIS as well as the  
22 final EIS. And these cards are located at the DOE  
23 exhibits.

24 The document is available in three forms. It's

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1 available in electronic form on a CD. You can get a hard  
2 copy of the summary plus a CD of the entire document, or  
3 you can get the entire document in hard copy form. We  
4 have, with us this evening, a limited number of hard copy  
5 summaries and CDs.

6 After the Draft EIS is distributed to the public, a  
7 public hearing is held to help gather comments on the  
8 document and on the proposed federal action. During the  
9 informal session earlier this evening between 4 and 7 p.m.,  
10 DOE and its support contractors as well as representatives  
11 of the FutureGen Alliance and the local site proponents,  
12 the FutureGen Illinois Tuscola team, were available to  
13 listen to your concerns and to attempt to answer your  
14 questions. We hope this session was as informative for you  
15 as it was for us.

16 During the formal session tonight, we will briefly  
17 present the role of DOE; and we will go over the relevant  
18 parts of NEPA compliance and the remaining schedule. And  
19 the FutureGen Alliance will briefly present an overview of  
20 the FutureGen Project. Then we will begin the formal  
21 comment session.

22 As with the scoping meetings held in August, we will  
23 give priority to elected officials and their designated

0004

24 representatives to go first. However, DOE realized, during  
1 the scoping meetings, the general public had to wait a long  
2 time before having an opportunity to speak.

3 This time, with the assistance and cooperation of  
4 elected officials, we hope to give the general public an  
5 opportunity to speak sooner this evening. We hope that all  
6 of you can stay for the entire oral comment session. For  
7 those who cannot stay and for those who do not feel  
8 comfortable speaking in front of large audiences, we do  
9 have a separate comment station located out through the  
10 lobby and in the room to the side.

11 While we prefer that you provide oral comments here  
12 during the formal, oral comment session later this evening,  
13 the comment station located in the room to the side is an  
14 alternative. This option is available until the formal  
15 comment period begins.

16 Written comments are given equal weight with oral  
17 comments, and written comments tend to be crafted more  
18 carefully and can be written at your convenience. You may  
19 provide written comments instead of or in addition to oral  
20 comments. Again there are comment cards available at the  
21 DOE exhibit. You can fill out the cards and submit them  
22 tonight you or anytime before the close of the comment  
23 period on July 16.

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24 You can also provide comments by e-mail, by regular  
1 mail, faxes, voice mail, and telephone calls as indicated  
2 on the literature available at the DOE exhibits.

3 On tonight's agenda, we will have a presentation on  
4 DOE's role in the project. That presentation will be  
5 provided by Tom Sarkus with the DOE office in Pittsburgh.  
6 Tom is up here at the table.

7 There will be a project overview by Mike Mudd the CEO  
8 at the FutureGen Alliance. I will briefly go over NEPA  
9 compliance issues and the NEPA schedule. And, finally, we  
10 will hear comments from you, the general public.

11 Visiting with us tonight, we have Bart Ellefritz  
12 representing US Senator Richard J. Durbin. If you're here,  
13 please stand.

14 Kathy Harrington, representing Senator Barack Obama.

15 Matthew Jones representing US Representative

16 Tim Johnson.

17 Rodney Davis representing Congressman John Shimkus.

18 We have Warren Ribley, Illinois Department of  
19 Commerce and Economic Opportunity here on behalf of the  
20 governor.

21 State Representative Chapin Rose. Chapin may not be  
22 here with us right now.

23 Chuck Knox, Chair of the County Board. Thank you.

24 Don Munson, Vice Chair of the County Board.

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1 Daniel Kleiss, Mayor of the City of Tuscola.

2 And Bob McCleary, Village President of Savoy.

3 Representing the Department of Energy, we have

4 Tom Sarkus, again, with the DOE office in Pittsburgh,

5 National Energy Technology Laboratory. Tom is the DOE

6 Project Director for FutureGen. He's with the Office of  
7 Coal and Power R and D.

8 We also have Otis Mills with the DOE office in  
9 Pittsburgh. Otis is our media relations expert.

10 Jeff Hoffman with the DOE office in Pittsburgh. Jeff  
11 is a systems engineer working with us on the project.

12 Recently joining the project, is Bill Guillian with  
13 the DOE in Morgantown. Bill is a geologist.

14 And I'm Mark McKoy, the DOE Environmental Manager and  
15 DOE NEPA Document Manager for FutureGen.

16 I also want to acknowledge the team that worked very  
17 hard to put together the Draft Environmental Impact  
18 Statement. This team is composed of people with  
19 Potomac-Hudson Engineering, Tetra Tech and the Louis Berger  
20 Group. With us this evening, we have Fred Carey, President  
21 of Potomac-Hudson Engineering, and the person who has  
22 endured the most in putting together the document and  
23 holding the schedule as well we have, Debra Walker, the  
24 NEPA Project Manager.

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1 I also would like to recognize all of the people here  
2 with Potomac-Hudson Engineering, Tetra Tech, Louis Berger,  
3 who have worked so hard on the document.

4 Would those people please stand. Some of them are  
5 already standing around the walls.

6 And now it's time for a few presentations to provide  
7 you with some background information regarding the  
8 project. Here is Tom Sarkus with the DOE overview, with  
9 the overview of DOE's role in the project.

10 TOM SARKUS: Good evening. This is a nighttime  
11 photo of Tampa Electric's IGCC, that's Integrated  
12 Gasification Combined Cycle Power Plant. It is one of just  
13 two coal-based IGCC plants in the United States and one of  
14 six in the world.

15 It's the top dispatch or basically the number one  
16 unit in Tampa Electric's generating system. And it's been  
17 operating commercially for over 10 years. With operational  
18 plants having designs that are, in most cases, over 10 and,  
19 in fact, approaching 15 years old, it's time to build upon  
20 the lessons we learned in Tampa, at Wabash River, and at  
21 other plants and to bring on the next generation of clean  
22 coal technologies. FutureGen.

23 I had the distinct privilege of supervising DOE's  
24 funding on the Wabash River and Tampa IGCC project. That's

0008

1 probably one of the reasons I was assigned to work on  
2 FutureGen 2 years ago. When Wabash River and Tampa were  
3 designed in the early 1990's, key external drivers were  
4 sulfur and nitrogen oxide emissions relevant to acid rain  
5 controls. If you think back 10 and 15 years ago, acid rain  
6 was a major environmental driver. But we also have to  
7 focus on the technical challenge of combining and  
8 effectively integrating a gasifier with a combined cycle  
9 power plant.

10 Today we have additional drivers, things such as  
11 mercury emissions and CO2. And CO2 is relevant to climate  
12 change. These drivers are going to require us to integrate

13 additional processes and improvements into the coal based  
14 IGCC plants of tomorrow.

15 As plant complexity tends to increase, so, too, will  
16 the role of advancing process controls. We expect  
17 FutureGen to become a prototype for the coal based power  
18 plants of the future, not only in the United States but  
19 throughout the world.

20 You've probably heard about FutureGen in the context  
21 of a technology-based mitigation strategy for climate  
22 change. That is, FutureGen will produce and separate  
23 hydrogen and carbon dioxide. We will gasify coal into  
24 hydrogen and carbon dioxide. We will use the hydrogen to

0009

1 produce electric power. And we will store the CO2 in deep  
2 geologic, saline aquifers.

3 Now, I'm often asked, when I explain this geologic  
4 storage concept, if there's enough storage capacity and how  
5 it works. This slide basically shows that all of the major  
6 CO2 emitters in north America emit a combined total of 3.8  
7 gigatons of carbon dioxide every year.

8 If we go and add up to the storage capacity of the  
9 geologic reservoirs, and recognize that these are not caves  
10 or caverns, these are, we're injecting CO2 into very tiny  
11 pore spaces in-between the sand grains of a rock. But the  
12 rock may extend for many miles, and it can be hundreds of  
13 feet thick. So when you calculate the combined total of  
14 all of this tiny pore spaces, you come up with very large  
15 storage capacity.

16 The bottom line here is that the storage capacity in  
17 North America is 3,800 gigatons. And we produce 3.8 every  
18 year. So that translates into a thousand years of storage  
19 capacity. And this is a conservative estimate. We've even  
20 seen estimates that are easily double this. That's a lot  
21 of storage capacity when you consider that we only have 250  
22 years supply of coal. And I laughingly say 250 years  
23 supply of coal, because that's a lot of energy. Coal is  
24 our most abundant fossil energy resource, and it's one

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1 that's grown right here in America.

2 FutureGen has currently estimated the cost almost 1.8  
3 billion dollars. That includes approximately 1-and-a-half  
4 billion dollars to design and build the power plant and the  
5 geologic storage facilities. Plus about \$300 million to  
6 operate those facilities for 3 years. And the operations  
7 costs are largely the cost of fuel or coal to operate the  
8 plant for those 3 years.

9 It's estimated that FutureGen will generate about  
10 \$300 million in electricity revenues during those 3 years  
11 which will essentially offset the cost of operation. So  
12 you have a 1-and-a-half billion dollar plant that will be  
13 built.

14 FutureGen is being implemented through a cooperative  
15 agreement between DOE and the FutureGen Industrial  
16 Alliance. Like Tampa and Wabash River, which I think stand  
17 as models of government-industry collaboration and  
18 partnership. We hope to repeat that again with FutureGen.  
19 And I believe that we have the group, both in the

20 government and within industry, that will do that for you.  
21 The Alliance consists of twelve coal mining and coal-  
22 based power companies. Their logos are shown here, and  
23 you'll have a presentation from Mike Mudd and Jerry Oliver  
24 of the Alliance in a moment.

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1 The cooperative agreement is structured around six  
2 budget periods. To me, as a project manager, I manage the  
3 government project against budget and against schedule.  
4 And we use a contractor cooperative agreement to implement  
5 that.

6 These six budget periods are shown on the schedule  
7 here. And we recently transitioned from the first budget  
8 period, which we're calling Budget Period 0. That included  
9 project structuring and conceptual design. And we've moved  
10 into Budget Period 1, which is preliminary design. After  
11 preliminary design, will come final design.

12 Over the past year, much of the work and attention,  
13 as you know, has focused on site selection and on  
14 conceptual design of both the power plant and the storage  
15 facilities.

16 Over the next year, you're going to see a transition,  
17 that some of that focus will shift toward selecting  
18 technology and equipment suppliers for the major parts of  
19 the FutureGen plant.

20 Design activities will continue to the spring of  
21 2009. And construction will then begin in the spring of  
22 2009 and will run through 2011. At that point, we will  
23 have what is called shakedown and start-up. And we expect  
24 to begin commercial operations of the FutureGen plant by

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1 the end of 2012.

2 DOE and the FutureGen Alliance are sharing the  
3 project costs with DOE paying 74 percent and the Industrial  
4 Alliance sharing 26 percent.

5 I'm sorry. The machine is having operator difficulty  
6 with me here.

7 As for international participation, a number of  
8 foreign companies have joined the Alliance as equal  
9 members. And several foreign governments have announced an  
10 intention to join on the government side of the project  
11 ledger. We hope to secure at less \$80 million from foreign  
12 governments at a charge of \$10 million each.

13 So far, four countries have announced their intention  
14 to join. India, South Korea, China and Japan. And we're  
15 looking for more at least four more. And the department is  
16 working to develop an agreement that will facilitate that  
17 international collaboration.

18 That ends my presentation. Here is my contact  
19 information if you have questions or feel a need to contact  
20 me. Thank you for your attention, and I look forward to  
21 hearing your comments later in the meeting.

22 (Applause.)

23 MARK MC KOY: Thank you, Tom. Next we'll hear  
24 from Mike Mudd, the CEO of the FutureGen Alliance providing

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1 update and overview of the FutureGen Project. I think he

2 will also have part of the presentation delivered by  
3 Jerry Oliver, the Senior Vice President for the FutureGen  
4 Alliance.

5 Mike.

6 MIKE MUDD: Good evening. Wow! What a thrill  
7 to see so many people who care in this room spending a  
8 summer night with us. Thank you very much for coming.

9 Early last year was the start of a very long journey  
10 for many of your leaders. In February, the Alliance sent  
11 out a request for offers to sites throughout the whole  
12 nation saying who wants to build the FutureGen plant in  
13 their town.

14 Twelve communities in seven states rose up and say,  
15 we want FutureGen in our town, in our communities.

16 We went through a very rigorous process, not based on  
17 politics but based on the quality of the proposal and the  
18 quality of the site. And as you all know, we, we came up  
19 with a short list of four sites which we announced in  
20 July.

21 I remember seeing on some of the videos the  
22 celebrations in some of your towns when we made the  
23 announcement. And then we called in your leaders and said,  
24 now the work really starts. And we told your leaders that

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1 between July and, basically, November, that they were  
2 required to develop an inordinate amount of information to  
3 support this environmental impact statement. And you see  
4 the result of that environmental impact statement on one of  
5 the tables here. Thousands of pages that analyze all  
6 features of the plant.

7 I really want to commend the hard work that they  
8 did. And I want to remind you that we are here, not  
9 because of what the Alliance has done, but because of what  
10 you and your leaders have done. Because you picked the  
11 site by the quality of your proposals.

12 So now we go to the next step. By the end of  
13 November, we will reduce that short list to a single site.  
14 And this is a very important part and process. Once again,  
15 that single site is going to be based on the quality of the  
16 information and the proposals we receive from you and from  
17 your states between now and the end of July. Jerry Oliver  
18 will go through a little bit more about this.

19 But I want to express the appreciation of the  
20 Alliance to the dedicated people associated with the  
21 proposal and the hard work.

22 Jack Lavin and his team, Bill Hoback and his team,  
23 and your local leaders. We know how hard you've worked,  
24 and we appreciate it.

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1 But a major project like this cannot help without the  
2 support in Washington. \$1.5 billion projects with over a  
3 billion dollars of support from the US government and \$400  
4 million of support from the Alliance.

5 The delegates that you have in Washington, you should  
6 all be proud of. I've had the honor of working with many  
7 of them. Your senators have, basically, Senators Durbin  
8 and Obama, have been supporters. But I've had the

9 privilege and honor of having the pleasure of dealing with  
10 Congressman Johnson, Congressman Costello and Congressman  
11 Shimkus. And I want to say they're awesome people. They  
12 represent you well. And I see their dedication and passion  
13 for coal and the dedication and passion to do the right  
14 thing. And their support has meant a lot in Washington.

15 So, at the end of the day, we will be making a  
16 decision of the final site. People ask, one person or the  
17 other, I can't say what the answer is going to be. But I  
18 think that, regardless of the outcome, the hard work that  
19 you have done and your leaders have done is impressive.  
20 And I really want to thank all of you.

21 With that, I'd like to past it on to Jerry Oliver to  
22 give you some details about the program. Thank you.

23 (Applause.)

24 JERRY OLIVER: Thank you, Mike.

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1 It's really a pleasure to be here. Ten months ago,  
2 we, we were here at the public hearings. And, and started  
3 the exercise that Mike talked about. And it's amazing how  
4 fast that time has gone by; I mean, we kind of blinked and  
5 here we are again.

6 We couldn't have done all the things that Mike talked  
7 about and all the things I'm going to talk about in a few  
8 minutes without an incredible team. And here the team  
9 included Tuscola. It included Douglas County, included  
10 your state FutureGen team, included the DOE. It included  
11 the Alliance, the Alliance members and our Alliance  
12 partners. And we worked together in a way that I think is  
13 pretty unique. And I was really pleased with what's  
14 happened. It's been great. And, and I think that that's  
15 the kind of cooperation you need to do something as unique  
16 and interesting as this project.

17 So let me start, give you a little background. I've  
18 got to remind you where we're at. This is going to be the  
19 cleanest coal-fueled power plant in the world. We're going  
20 to take out 90 percent of the CO2. And we're going to put  
21 at least a million tons of that CO2 underground, sequester  
22 it. We're going to store it and store it forever. And,  
23 and I'll get into some details of that; and it will kind of  
24 support what Tom talked about. We're going to create a

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1 living laboratory, a research platform, a way to actually  
2 take and commercialize technology that will make the idea  
3 of this thing both commercially viable and also  
4 environmentally benign.

5 We're going to do it with a very interest in global.  
6 And we are working with a global private and public  
7 partnership, and we're going to use a wide array of it,  
8 strong stake holders.

9 The objectives that we have, pretty clear and pretty  
10 simple. We're going to design a plant and build it, and  
11 where actual design is under way, that is a near zero  
12 emission coal fuel power plant. It's, and we're going to  
13 capture and sequester at least a million tons a year of  
14 CO2. We're going to generate very low emissions of SOx and  
15 NOx, particulate matter, and, and mercury.

16 We're going to push technology in every aspect of the  
17 plant. And we're going to do it in a way that we bring the  
18 plant on-line, as Tom said, by 2012, and, and be  
19 operational at that point.

20 And, really, the class that is critical on this list  
21 is we're going to try to build very broad stakeholder  
22 acceptance. And what we're doing, though, is right. It  
23 can be used around the globe and actually take CO2 out of  
24 the air and put in the ground.

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1 Why do you need it. This project allows for a very  
2 unique opportunity at a very large scale to understand the  
3 commercial and the technical implications of taking CO2 and  
4 putting it underground and leaving it there. It also  
5 allows us to work on the regulatory and the legal framework  
6 that will allow that to happen, not just here but  
7 everywhere around the United States and, hopefully, around  
8 the globe.

9 It gives us, because it is a research platform, we  
10 can actually push technology more than you would normally  
11 get it; because we don't have the same commercial drivers  
12 you would the plants. So we are going to take ideas that  
13 have gone to a certain level and actually move them  
14 forward. And we won't be successful to meet our goals if  
15 you don't do that. There isn't anybody in the globe that's  
16 as far along as this project. So the key, to me, is that  
17 we've got to keep moving it forward. And we've got to move  
18 it quickly.

19 And, lastly, critical to this thing is the  
20 international participation. Because, even if we do it in  
21 one spot and it isn't taken and used both across the US and  
22 around the globe, we've kind have failed. So the process,  
23 to me, is to make sure that you've got the international  
24 community involved.

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1 So, who is in the Alliance? There are twelve  
2 companies, as Tom said; but, of those twelve companies, six  
3 are US based, six are globally based. But we cover China,  
4 Australia, Europe, South Africa, South America, as well as  
5 the US. We have the involvement. Again, we have the US  
6 government in the form of the Department of Energy. And,  
7 as Tom said, they are bringing in other countries onto  
8 their side of the thing. So, the idea is to really to get  
9 as much of the global involvement as you can.

10 And we have partners. We have, first of all, a lot  
11 of Battelle people that are here tonight as part of the  
12 Alliance team. And they're one of the leading R and D  
13 organizations in the United States. And contribute heavily  
14 in subsurface and the management of the project. We  
15 brought experts in that will continue from, for every use  
16 of this to really understand what are the implications and  
17 what we're trying to do and how do you make it better.

18 And, lastly, we just brought on board Washington  
19 Group as both our engineer and our design contractor.

20 But we're going to build the plant so that we can  
21 operate on eastern coal, western coal, Illinois coal and be  
22 able to test more difficult coals and, as we go forward.

23 We are going to, as I said earlier, push technology.  
24 We're going to push gasification. We're going to push the

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1 gas turbine as far as you can. We're going to find ways to  
2 remove more CO2 than has been done before and use hydrogen  
3 in the production of electricities. So that, there's a lot  
4 of aspects to the, to the pieces of the plant where we will  
5 actually advance technology.

6 We're also going to integrate the removal of CO2 with  
7 the power plant, which has never been done. And there's a  
8 lot of testing that's going on on putting CO2 underground.  
9 There's a lot of the OR work to take and put them together  
10 in a single facility that operates all the time is, is  
11 actually a very unique aspect of the project.

12 And, lastly, we're going to create the ability to  
13 take sub-screens out of this plant to allow us to test  
14 things like fuel cells and other new technologies we're  
15 trying to move in the market place.

16 We're going, we are going to push the sequestration  
17 technology. First of all, it's not being done; so that  
18 isn't that hard to push. But we are building models right  
19 now that have never been built to really understand the  
20 implications of putting these molecules underground. We're  
21 going to monitor it above, in the formation. We're going  
22 to monitor it with, with systems that don't exist today.  
23 And, and allow the universities here locally to help test  
24 some of the ideas that we need to make that part better.

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1 But we are going to really understand what happens to CO2  
2 underground.

3 And, as Tom said, there is a thousand years of  
4 storage, if you do this right, for CO2, underground in the  
5 type of formations that the Mount Simons represents here in  
6 Illinois.

7 There is also another 7,000 gigatons of storage  
8 around the globe. So if you do it here, there is, there is  
9 an amazing amount of storage potential around the globe.  
10 So the idea of taking power plants and putting the CO2  
11 underground is something that, once we prove this, will  
12 actually allow us to move large volumes of CO2 out of the  
13 air.

14 So where have we been. We've, we've gone from a  
15 conceptual design. We're in the process of moving toward a  
16 preliminary design. We've looked at a lot of ways to build  
17 this plant, a lot of alternatives. We've also made sure  
18 that all the alternatives allowed us to be fuel flexible,  
19 which is a bit of a challenge in itself.

20 And we've taken, at the end of last year, and come up  
21 with three designs that fit. We did the material and, heat  
22 material balances on those to do cost estimate on those.  
23 And they became part of the end of the last phase.

24 Now, what we're doing is taking the work we've done,

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1 moved it to a single plant, a single technology base; and  
2 we're going out to market, as we speak, asking the, the  
3 equipment and, and technology supply community to help us  
4 design and build the facility.

5 The plant is going to cost about \$1.5 billion, as Tom  
6 said. The 300 million that was in his numbers were for the  
7 purchase of coal. So it's about a \$1.5 billion project.  
8 Probably, from a schedule standpoint, the critical things  
9 to me is we're going to break ground in 2009. And we're  
10 going to have the plant on-line at the end of 2012. So  
11 it's not too far out. From now, it's a very aggressive  
12 schedule; but I think very doable.

13 What are we doing right now? We're working on  
14 preliminary design. We are, we are trying to figure out,  
15 from a technology standpoint, what technologies have a  
16 chance to fit and would make the most sense. We are, we  
17 have developed specifications for the various pieces of the  
18 plant what we'd like to see if we could get it. We've been  
19 working on the do-diligence of the sites. They put in  
20 offers last year; and we've not only been working on EFB's;  
21 but we've been bothering them for months on, on every  
22 aspect of their proposal, there original proposal.

23 And right now we are coming out with the guidelines  
24 for best and final offers. And that will be the next stage

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1 of this, and I'll talk to you about that in a second.

2 And we've been supporting the DOE in the development  
3 of EIS and in moving of that process forward.

4 So what's next. About the fifteenth of June, Friday,  
5 about a week-and-a-half ago, we came out with guidelines  
6 for the four sites for the best and final offer. We've  
7 asked them to return their offer to us by August the 1st.  
8 Assuming that the DOE finishes the EIS process or the RODS  
9 on the four sites by the end of October, we'll make a  
10 decision in November on a plant site.

11 And the day after we make a decision, I and a team  
12 will be here to start the job. So we aren't going to delay  
13 once we make a site selection. So, bottom line, this  
14 project is going to be fast. We're on track where we're  
15 supposed to go. We've come a long ways, but we've got an  
16 awful lot further to go. We've got a great site. We've  
17 had a tremendous team to this point, and we couldn't have  
18 been in this hearing tonight without all the work that's  
19 been done by the folks that have been involved.

20 So, it's a real pleasure to present where we are and  
21 to have an opportunity to talk about the FutureGen  
22 Project. Thank you.

23 (Applause.)

24 MARK MC KOY: Thank you, Jerry and Mike.

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1 Last August, when we were here, I provided an  
2 overview of NEPA and some of the most salient points. And  
3 I realize some of you here tonight maybe were not here  
4 then; so I'll go over a few of the key points as well as  
5 some of the things that are most important at this point in  
6 the NEPA process.

7 NEPA stands for the National Environmental Policy  
8 Act. It is a federal statute. It became effective  
9 January 1, 1970. It applies to all federal agencies. It  
10 does not apply to state government agencies or to local  
11 government agencies; nor does it apply to private

12 individuals and private organizations, only to state  
13 agencies.

14 It is often referred to as the National Charter for  
15 Protection of the Environment, because it was the first  
16 statute that broadly brought environmental considerations  
17 into the decision-making process.

18 The NEPA mandate, as written up there, is that  
19 environmental information must be available to public  
20 officials and to citizens before federal decisions are made  
21 and before federal actions are taken. It must be based on  
22 high-quality information. The scientific analyses used  
23 must be reasonably accurate.

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24 There is a requirement that we provide copies of the

1 EIS to federal agencies having expertise in the relevant  
2 fields and provide them with an opportunity to review and  
3 comment on the document. We also provide copies of the  
4 document to state agencies and to local agencies so that  
5 they can also comment on the document.

6 Most importantly, it requires public involvement in  
7 the process. And that's why we're here this evening with  
8 the public hearing.

9 The purpose of the public hearing is to invite  
10 comments from interested and affected persons and  
11 organizations on the draft EIS. Appropriate comments  
12 address the adequacy of the EIS, the merits of the  
13 alternatives or the proposed federal action especially  
14 regarding environmental impact.

15 We are at the middle of the process. That is, we  
16 have prepared a Draft EIS and we have distributed that to  
17 members of the public that have requested it. We will take  
18 the comments that we receive and prepare a Final EIS. That  
19 Final EIS will also be distributed to the public. No  
20 sooner than 30 days thereafter, the DOE may issue a record  
21 of decision.

22 DOE does have some affirmative responsibilities in  
23 addressing your comments and concerns. DOE must consider  
24 public comments collectively and individually. DOE must

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1 respond to public comments in the Final EIS in one of the  
2 following ways:

3 DOE can modify the alternatives.

4 DOE can evaluate alternatives not previously given  
5 serious consideration.

6 DOE can supplement, improve, or modify analyses or  
7 make factual corrections. Otherwise, DOE must explain why  
8 it did not, why the comments did not warrant further agency  
9 response.

10 The substantive comments will be attached to the  
11 Final EIS and distributed to the public.

12 As I said before, we are in the middle of the  
13 process. As listed up there, you can see that we are now  
14 in the midst of the public hearings which are occurring in  
15 June of this year. We would like to have the Final EIS  
16 distributed to the public sometime in September. That  
17 would allow us to get to a record of decision sometime in  
18 October.

19 DOE does want your participation in the process. We  
20 take very seriously our obligations to get your concerns  
21 and address your concerns to the extent that we can.

22 Please send your written comments to me, the NEPA  
23 Document Manager at Mail Stop N-03, P.O. Box 880,  
24 Morgantown, West Virginia 26507-0880. You can send e-mails

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1 to FutureGen.EIS@NETL.DOE.GOV. Again, keep in mind the  
2 comment period does close July 16.

3 This is the time to begin the formal comment period  
4 when the public is invited to provide oral comments  
5 regarding the adequacy of the EIS, the merits of the  
6 alternatives or the proposed federal action specially  
7 relative to potential environmental impacts.

8 For those of you providing oral comments, we ask that  
9 you keep your comments to within a 5-minute time frame.  
10 This allows us to make sure everyone has equal opportunity  
11 to provide comments. You may speak a second time after  
12 everyone has a first chance to speak.

13 It is important to make your views known now, either  
14 in oral statements or in writing. Again, we have comment  
15 cards. These are the comment cards that available at the  
16 DOE exhibits. There are check boxes on these cards where  
17 you can check to indicate that you would like to receive a  
18 copy of the Final EIS; and you can check to indicate  
19 whether you would like a hard copy or a summary and a CD.  
20 If you would like to receive a copy of the Draft EIS which  
21 we have just distributed, please write that into one of the  
22 lines above. And, of course, make sure you have the  
23 appropriate mailing address provided on the postcard.

24 You can hand these in to me this evening. You can

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1 put a postage stamp on these and mail them to me. Please  
2 have them postmarked before July 16.

3 Again, all comments will be considered equally as we  
4 continue to develop the Final EIS. And, again, I'll go  
5 over a few of the rules for making comments as shown on the  
6 slide here.

7 Again, 5 minutes per speaker, please. Two  
8 opportunities to speak, if time permits; and, again,  
9 government officials and preregistered speakers will go  
10 first. And then I'll provide an opportunity for everyone  
11 else to come up.

12 A transcript is being made. We have a court  
13 reporter. So if you come up to provide oral comments,  
14 please state your name. You may need to spell your name  
15 and speak clearly. A copy of the transcripts of this  
16 meeting will be available at the Tuscola Public Library  
17 within a few weeks and will be part of the Final EIS.

18 The first commenter is Matthew Jones, representing US  
19 Representative Tim Johnson.

20 MATTHEW JONES: I'm not sure which direction I'm  
21 supposed to face here.

22 My name is Matthew Jones. Real brief. I am  
23 representing Congressman Tim Johnson who most of you all  
24 know. Congressman could not be here, obviously; they were

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1 out in Washington, D.C. voting. But he is en route to come  
2 back home. Never the less, he wanted to me express to all  
3 of you that, obviously, we all know how important this  
4 project is. But more importantly, that, not only as  
5 Congressman Johnson but a lot of you local, state and  
6 federal officials have all been working together.

7 And that's one of the rare benefits of an opportunity  
8 like this is to actually see people working together. And  
9 I know, in this time of age, regardless if you're  
10 republican or democrat, it's nice, it's refreshing to see a  
11 project for the common good and everybody working  
12 together.

13 And, obviously, with all of that said, we want to  
14 bring it to Illinois. And I realize we're in the Tuscola  
15 site, but we represent both cities. Now, I'm not going to  
16 lie. I'm from Arthur, Illinois; and I'm from Douglas  
17 County. I have been for six generations. Well, not me  
18 personally, but my family. So I want to see it right here  
19 for the obvious reasons, the jobs, the environmental impact  
20 and, obviously, the energy.

21 But from Representative Congressman Johnson, we just  
22 want to bring it to Illinois; because it's, obviously,  
23 going to impact everyone directly or indirectly. And it's  
24 for the common good for everybody. So, I didn't have a big

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1 long speech prepared. I know I'm under the 5 minutes. So  
2 I hope that will be pleasing to everybody. But thank you  
3 very much for inviting us, and I will definitely relay that  
4 there was a large support here in the Tuscola site.

5 So thank you very much.

6 (Applause.)

7 MARK MC KOY: The next commenter is  
8 Warren Ribley, Illinois Department of Commerce and Economic  
9 Opportunity.

10 WARREN RIBLEY: Good evening. Mark, thank you.  
11 It's great to see this turnout as Mike Mudd indicated.  
12 Thank you, residents of Tuscola, Douglas County and  
13 surrounding counties. Great to see your interest in this  
14 project.

15 My name is Warren Ribley. Not to be confused with  
16 Ripley of Ripley's Believe It or Not.

17 I am Director of Operations for the Illinois  
18 Department of Commerce and Economic Opportunity. On behalf  
19 of Governor Rod Blagojevich and DCO Director Jack Lavin, it  
20 is my pleasure to welcome back the US Department of Energy,  
21 FutureGen Alliance and their teams to Illinois for another  
22 round of public hearings that represents the next critical  
23 step in this important selection process.

24 We've been actively engaged for more than 4 years.

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1 As you can see, there's a high level of energy and  
2 excitement surrounding FutureGen and, clearly, its impact  
3 it would have not only on our state but our nation and,  
4 really, across the world.

5 I want to thank Mayor Dan Kleiss and Brian Moody as  
6 well as all the attendees here tonight for your continued  
7 participation and enthusiasm about this project that's

8 continued throughout the process.

9 Again, I'd also like to recognize Bill Hoback,  
10 Director of the Office of Coal Development, DCO, and his  
11 team, who really have been our resident experts and  
12 advocates for FutureGen.

13 FutureGen is, indeed, the future of energy; and we're  
14 here to tell you that Illinois is ready for FutureGen.

15 We reach this point with quiet confidence and high  
16 anticipation; and we've benefited from the input of people  
17 throughout Illinois including planners, elected officials,  
18 business leaders, farmers, and some of the top scientific  
19 and engineering talent anywhere in the world.

20 There may be no economic development project in the  
21 history of this state -- that's the truth -- that  
22 approaches the scope of FutureGen and its potential impact,  
23 not only on us here but, again, around the nation and the  
24 world. So think about that. It's pretty awesome.

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1 A new Southern Illinois University study that the  
2 governor just recently released found that FutureGen would  
3 have actually a much larger economic impact than the 1,300  
4 construction jobs and the 150 permanent jobs that the  
5 Department of Energy has estimated would be created. The  
6 study found that, during the 4-year construction period,  
7 there would be more than \$1 billion in economic impact  
8 statewide to Illinois. And there would be more than 1,200  
9 spin-off jobs that would be created.

10 Once FutureGen is operational, the study shows it  
11 will generate a hundred thirty-five million dollars  
12 annually and total statewide economic output with \$85  
13 million estimated annual increase right here in Douglas and  
14 Coles County. And, additionally, it will create 300  
15 full-time jobs elsewhere statewide and spin-off.

16 And the local communities here in East Central  
17 Illinois and the hard-working people that live in Douglas  
18 and Coles County, you've really met every challenge to date  
19 to bring FutureGen here and should be applauded for that.

20 This region wants to show the world how to use coal  
21 cleanly, how to capture and store CO2. We've worked  
22 creatively and cooperatively on solutions to complex  
23 problems and nurtured each other as valued partners in this  
24 endeavor which will pay dividends to us and across the

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1 United States and the world for decades to come.

2 We have said all along that FutureGen, that Illinois  
3 is the place for FutureGen based on the merits of these two  
4 site, alone. And we feel more confident about that with  
5 each passing day.

6 Some of the best minds in the state have helped us in  
7 reaching this stage. We've had top to bottom cooperation,  
8 as mentioned earlier, from not only all levels of  
9 government but also including the private sector.

10 We wouldn't be here today if we didn't absolutely  
11 have the best local partners in Brian Moody,  
12 Angela Griffin, from Coles County, and their respective  
13 FutureGen teams. They're all to be applauded.

14 However, as we head down the homestretch, I'd like to

15 reiterate all the distinct advantages that Illinois offers  
16 FutureGen, starting with our geology.

17 Illinois is blessed with the geology to demonstrate  
18 this breakthrough technology as well and probably better  
19 than anywhere else in the United States and, in our  
20 estimation, including that of our competitors in Texas. We  
21 have deep Vict porous sandstone. I hope you have had a  
22 chance to see in some of the demonstrations that the safety  
23 margins of at least two cap rock seals that have never,  
24 ever been penetrated.

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1 Illinois, in addition, offers a platform from a  
2 geology standpoint that will maximize the transferability  
3 of the FutureGen technology to sites throughout the United  
4 States and the world. We've been examining and documenting  
5 this potential, with the help of the top scientists in the  
6 region, for more than 3 years. And we're very confident in  
7 those results.

8 Water is our next advantage. Both sites offer more  
9 than ample water for FutureGen needs. Pretty well  
10 demonstrated that here this week. And thank you for our  
11 rain. And to do so at a reasonable cost without negatively  
12 impacting current or future water supplies in our region.

13 Location. Among other advantages, our sites are  
14 almost ideally situated in relation to the nation's major  
15 coal fields, saving the Alliance millions of dollars in  
16 rail costs as well as further minimizing the carbon profile  
17 of the project of shipping the coal in.

18 Leadership. I will bring that up again. This  
19 project has garnered bipartisan support from elected  
20 officials in Illinois, in Congress as well as in  
21 Springfield; and we, as a state, particularly under  
22 Governor Blagojevich, have never lost faith in the  
23 long-term potential of Illinois coal.

24 Research capacity. We do have leading coal research

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1 institutions supporting Illinois' bid for FutureGen,  
2 including Southern Illinois University and our partner  
3 state, Indiana, Purdue University, which are two of the top  
4 coal research centers in the nation.

5 We have the University of Illinois just a few miles  
6 to the north. It's a premier research university with a  
7 number of, four engineering, with the number four  
8 engineering program of any college in the country right  
9 here in our backyard. And, of course, a top state  
10 university, Eastern Illinois University, just down the  
11 road.

12 Investment. You've committed the investment.  
13 Illinois' investment package includes an unmatched \$17  
14 million grant to the FutureGen Alliance. In addition, we  
15 have committed the Illinois State Geological Survey and  
16 some of the nation's top scientists in their fields to  
17 oversee the long-term monitoring of the CO2 once it is  
18 captured and stored.

19 We also have history on our side. As we've  
20 emphasized the last round of the FutureGen hearings,  
21 Illinois is a coal state, not an oil and gas state. We're

22 a coal state. We've demonstrated our belief in coal and  
23 investments of millions of dollars in the development of  
24 technology of clean coal.

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1 We have, within the past several weeks, permitted,  
2 through the Illinois EPA, the first two coal gasification  
3 projects to be advanced anywhere in America in the last 20  
4 years. And we're very close to permitting and breaking  
5 ground on a gasification project in the far northwestern  
6 part of the state, in East Dubuque, that will make nitrogen  
7 fertilizer from coal, quite significantly, beginning  
8 producing for US consumption the first and, producing the  
9 low sulfur diesel fuel made from Illinois coal.

10 Fundamentals for FutureGen are in place with the  
11 water. We have the geology. We have the location. We  
12 have the economics. We have the research. We have the  
13 political leadership, and we have the community support.

14 With science on our side and all of these strategic  
15 assets, we are confident that the world's cleanest coal  
16 plant will be built in this state. We're all here today  
17 because we share in this vision and we believe in the  
18 possibilities of this facility to change the way we look at  
19 energy production.

20 As we stated, FutureGen needs Illinois. Illinois  
21 needs FutureGen.

22 Thank you very much.

23 (Applause.)

24 MARK MC KOY: We have with us now State

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1 Representative Chapin Rose. I believe he will be the next  
2 commenter.

3 CHAPIN ROSE: Thank you. And I apologize for  
4 being late. We were in this overtime session. We have to  
5 be back at 9 a.m. tomorrow. But I hope that the fact that  
6 I'm here to tell you how important I view this project.

7 And with that, I want to begin; and I don't want to  
8 bore the folks who were in Mattoon the other night, but  
9 welcome. Welcome to Illinois. Welcome to Tuscola this  
10 time. I absolutely hope that you have enjoyed your visit.  
11 I know that this is a wonderful community, a wonderful  
12 place to live. And I just heard Mr. Ribley tell you a  
13 little bit about why we think Illinois should be the new  
14 home of FutureGen.

15 I want to highlight, just for a second, a few  
16 things. The geology is here. The geology is here. We  
17 have the cap rock seals. They have not been perforated,  
18 unlike our competitor's state.

19 The technology is here. The University of Illinois  
20 is 20 minutes to the north. Eastern Illinois is 20 minutes  
21 to the south. And SIU and their coal development  
22 laboratory is not too far beyond that.

23 Finally, and I think most importantly, the coal is  
24 here. As I understand this project, it's designed

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1 specifically to find an economic use for the high sulphur,  
2 so-called bad coal. That bad coal is strewn all about the  
3 State of Illinois. All about Kentucky. All about

4 Indiana. And, you know, we've been outreaching to our  
5 neighbors and our neighboring states to bring them on board  
6 in order to bring this project home.

7 Something else I want to just talk about. And I  
8 think Matt Jones from Tim Johnson's office touched on, is  
9 the unprecedented scope of the cooperation this has brought  
10 on. The governor's office, Governor Blagojevich's office;  
11 the DCO; Director Lavin, who was at the Mattoon meeting;  
12 Mr. Ribley; Tim Johnson; John Shimkus; our congressional  
13 delegations; our local folks. You know the Mayor of  
14 Tuscola is over here, Mayor Kleiss. The Mayor of Mattoon.  
15 I have, in my 5 years of office, never seen anything like  
16 this. Never seen anything like this.

17 On the floor of the House of Representatives today,  
18 I, a Republican, had a conversation with the Democratic  
19 Speaker of the House about FutureGen. This is  
20 unprecedented in its scope, the cooperation to bring this  
21 project to the State of Illinois.

22 I want to close my remarks, again, by welcoming you  
23 and Chairman Mudd and the members of the panel. We  
24 appreciate you being here. I hope that your stay was

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1 enjoyable. If there's anything we can do to make it more  
2 so, please let us know. My office is certainly at your  
3 disposal.

4 And, finally, I just want to reiterate. The  
5 technology is here. The geology is here. The coal is  
6 here. We want FutureGen here in Illinois. So thank you  
7 very much, and I hope you enjoy the rest of your stay

8 (Applause.)

9 MARK MC KOY: The next commenter is Joe Burgess,  
10 Community Unit School District Number 301.

11 JOE BURGESS: Good evening. Joe Burgess,  
12 Superintendent of Schools. I also have the pleasure, over  
13 the last 3 years of also being part of the Tuscola Economic  
14 Development Board that, those of us from Tuscola commonly  
15 know as TEDI.

16 I think we owe a lot to Brian Moody for the work of  
17 the development that this project has come along with and  
18 thanks; and thank you, Brian.

19 (Applause.)

20 Special welcome to those of you who are visitors of  
21 our community. I hope you found it friendly and enjoyable  
22 but also informational.

23 Our school system, when we saw that we were going to  
24 be one of the finalists, took a very proactive action

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1 towards that. We know that, now that we're on, not only  
2 the national map, the world map, that Tuscola's potential  
3 for growth, regardless of whether FutureGen becomes part of  
4 our community or not, is great.

5 The planning stages are set. Our board of education  
6 is, has set that through planning meetings, talking about  
7 the impacts of growth and what that will do to our, not  
8 only to our community but to our school buildings and to  
9 our educational system.

10 With that, I'd like to thank the forefathers of our

11 school system. All three of our buildings are easily added  
12 on to. Potential for growth and space is there. We would  
13 welcome the opportunity for those students, because those  
14 students will be getting a first-class education.

15 Those of you from the Department of Energy, I'm sure,  
16 are aware from your friends No Child Left Behind that you  
17 have in Washington, D.C. with the Department of Education.

18 Our elementary, this year, was recognized by  
19 Washington, D.C. as a Blue-Ribbon School. So we could  
20 offer your students that would be coming to Tuscola as a  
21 part of our system a First-class National Educational  
22 program.

23 Lastly, I would be remiss, as educational leader, not  
24 to well you that we would look forward to also the

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1 educational opportunities that FutureGen could potentially  
2 bring to our students. The technology. The science.  
3 Those are all things that we're very excited about. We  
4 would look forward to partnering with you, allowing our  
5 students and our staff to learn from you and, hopefully,  
6 you learn from us.

7 So welcome you to Tuscola. We hope you're part of  
8 our lives soon, and take care. Thank you.

9 (Applause.)

10 MARK MC KOY: The next commenter is Vernon Knapp  
11 with the Illinois State Water Survey.

12 VERNON KNAPP: My name is Vernon Knapp. I'm the  
13 Assistant Director for the Center of Watershed Science at  
14 the Illinois State Water Survey. The survey is a division  
15 of the Illinois Department of Natural Resources. I'm also  
16 the leading service monitor technologist for the Water  
17 Survey's Water Supply Planning Program.

18 My involvement with the FutureGen in Illinois began  
19 over a year ago when I prepared the state's water supply  
20 assessment of its proposed sites. Also over the past year,  
21 I have provided technical feedback regarding Tuscola's site  
22 plan to build upon the existing water supply capabilities  
23 and also reduce their dependence on, dependence on the  
24 Mahomet aquifer as a supplemental water supply source.

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1 Natural flows in the Kaskaskia River augmented by the  
2 continually growing amount of waste water discharge into  
3 the river by the Champaign/Urbanda southwest treatment plant  
4 remained the predominant sources of water supply for the  
5 Lyondell Equistar water withdrawal.

6 The possibility of increased use of the Mahomet  
7 aquifer is a concern for many because the aquifer is a  
8 water supply source for many communities in the region.

9 The Lyondell Equistar Company and its predecessors  
10 have a long history of pumping water from the Mahomet  
11 aquifer dating back to the 1950's. The supply from the  
12 company's Mahomet aquifer belt can be substantial with  
13 individual well yields exceeding 1,500 to 2,000 gallons per  
14 minute.

15 Although these wells can provide an abundant source  
16 of supply, there is a lessening for their use, in part,  
17 because of a continuing distance of waste water effluence

18 into the river.

19 On-going studies by the Water Survey may lead to an  
20 even further reduction of Lyondell Equistar's need for the  
21 Mahomet aquifer. As part of our agency's water supply  
22 planning activities for the Mahomet aquifer we are  
23 conducting discharge measurements on the Kaskaskia River to  
24 more accurately quantify the amount of low flow in the

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1 river.

2 Based on this chart taken this spring and summer, we  
3 estimate the river has as much as 2-and-a-half times the  
4 amount of flow during low-flow conditions as previously  
5 estimated for determining supplemental water needs.

6 I've also reviewed the proposed water withdraw  
7 practices for supplying the FutureGen facility as prepared  
8 by Jim Crane, Douglas County Engineer. These proposed  
9 practices would be expected to further and substantially  
10 diminish the frequency of the Mahomet aquifer's use as a  
11 supplemental source.

12 There are two key components that would reduce the  
13 need for Mahomet aquifer water. The first is to reuse the  
14 treated waste waters from the Lyondell Equistar facility,  
15 replacing the existing discharge into the Kaskaskia River  
16 and, thereby, removing the need to augment low flows in the  
17 river for the purpose of waste water pollution.

18 The second component is the construction of  
19 additional, substantial reservoir storage at the site of  
20 the Kaskaskia River withdrawal. Such that, during the dry  
21 periods, the stored water can be used for supply instead of  
22 the need to augment flow in the river for withdrawal.

23 With the development of these two proposed components  
24 and the continually growing amount of waste water being

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1 discharged into the river, there is a high degree of  
2 confidence that supplemental water from the aquifer would  
3 be needed only for perhaps a few months during the most  
4 severe drought conditions.

5 We recognize that future operation of the Mahomet  
6 wells, in these severe drought conditions, could have  
7 impact on nearby existing and proposed wells. However for  
8 the short periods that the aquifer may be called upon, we  
9 have no reason to expect long-term, aquifer yield  
10 limitations.

11 Thank you.

12 (Applause.)

13 MARK MC KOY: The next preregistered commenter  
14 is David Cook with Carle Hospital.

15 DAVID COOK: Good evening. My name is  
16 David Cook, the Vice President of Carle Foundation  
17 Hospital.

18 Our hospital stands ready to serve the health-care  
19 needs of FutureGen's construction crews and future  
20 employees. We wholeheartedly support your proposal to  
21 locate a plant in Central Illinois.

22 Carle Foundation Hospital is the area's Level 1  
23 trauma center. We're a 305-bed facility located in Urbana,  
24 about 25 miles from here.



7 is Anita Duffy, also with Carle Hospital.

8 ANITA DUFFY: I think I'm the last one from  
9 Carle. But thank you for listening to us.

10 My name is Anita Duffy. And I'm the Director of  
11 Emergency Preparedness for Carle Foundation Hospital. And  
12 I, on behalf of Carle Foundation Hospital, would like to  
13 reiterate our support for the gen, the FutureGen Project  
14 moving into Illinois. Carle's participation at Illinois  
15 Department of Public Health is a lead hospital for this  
16 entire region which includes 22 counties. And we're  
17 charged with leading the area in disaster emergency  
18 preparedness.

19 While we never hope to have to deal with any kind of  
20 natural or man-made disaster, we are prepared. Carle  
21 Foundation Hospital has stockpiled supplies and equipment  
22 that we keep in trailers, and we're available to respond  
23 anywhere in the region to help in the need of a crisis or  
24 disaster.

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1 We can provide care, medical care to victims anywhere  
2 within Region 6. Our trailers are equipped to set up a  
3 field hospital anywhere they may be needed.

4 So we also have a mobile decontamination trailer  
5 that's kept at Carle and is available 24/7 that can respond  
6 anywhere needed in this area with a team.

7 So we work very closely with local, state, and  
8 federal authorities in all aspects of emergency planning,  
9 mitigation, preparedness, response and recovery. So Carle  
10 Foundation Hospital and Emergency Preparedness Department  
11 is eager, very eager to form a good working relationship  
12 with the FutureGen Project as you move into Illinois.

13 Thank you.

14 (Applause.)

15 MARK MC KOY: The next preregistered commenter  
16 is William Lubey, Illinois AFL-CIO.

17 WILLIAM LUBEY: It's a long walk from the back.

18 I just, basically want to bring up for everyone here  
19 what I think, and I haven't heard yet, but our greatest  
20 resource in this state, I believe our work force. Our  
21 organization represents nearly a million members in this  
22 state and tens of thousands in the East Central Illinois  
23 region. Highly skilled, highly trained work force that's  
24 quite used to and quite motivated on getting projects,

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1 bringing projects in on time and under budget.

2 The other thing, along those lines, being very  
3 succinct here, is that our review of the, of the EIS, we  
4 believe there's some inconsistencies in the wage data from  
5 the Texas sites. And we just wanted to, we'll be following  
6 that up with, with written comments. But we believe that  
7 should be more or at least a second review or more thorough  
8 review of that.

9 But, again, thank you for coming; and thank you for  
10 letting me speak too. So thank you.

11 (Applause.)

12 MARK MC KOY: The next preregistered commenter  
13 is Barry Matchett with the Environmental Law and Policy

14 Center.

15 BARRY MATCHETT: Good evening. Thank you for  
16 allowing me to speak. I'm Barry Matchett. I'm with the  
17 Environmental Law and Policy Center. We're a Chicago-based  
18 organization that works throughout the Midwest. And we are  
19 an organization that very frequently is opposed to coal.

20 I think, today, we have lawsuits against four coal  
21 plants around the Midwest. But not this plant. We are  
22 supportive of FutureGen. We are supportive of both  
23 Illinois sites. We are supportive for three very specific  
24 reasons.

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1 First, FutureGen represents the opportunity for our  
2 country and for our state to utilize Illinois coal and to  
3 utilize this research. We have a vast reserve.

4 Right now, the Illinois coal plants burn about 85  
5 percent western coal. That doesn't seem right to us as  
6 citizens of Illinois. It certainly doesn't seem right to  
7 us from an economic perspective. And we can use the  
8 technology that FutureGen will utilize to burn Illinois  
9 coal in an environmentally responsible way. And we are  
10 enthusiastic supporters of that.

11 Number 2, and the thing that seems to be the point of  
12 most of the conversations this evening. It sequesters the  
13 CO2, the carbon dioxide output from coal plants.

14 There's no debate. Carbon dioxide is causing global  
15 warming. There's a solution to this situation, so that the  
16 catastrophic, apocalyptic role of the event at some point  
17 will happen, can be averted. This is the solution. We can  
18 sequester CO2 that's used, that's created when you burn  
19 coal. And we are enthusiastic supporters of this  
20 FutureGen. And using Illinois' specific geology is the  
21 solution. And we are keen on seeing that happen here in  
22 Illinois.

23 And Number 3 -- And I thought the point that you  
24 brought up, sir, was, Mr. Oliver, was particularly

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1 salient. This, as a technology transfer opportunity for an  
2 American technology to be exported to our friends in the  
3 developing world, China and India, in particular, who have  
4 massive populations, which are all seeking our way of life  
5 and our electric needs and they're seeking to do it by  
6 using coal, needing us to succeed. We need to succeed for  
7 them, and they need to succeed by using the stuff that we  
8 do here in Illinois.

9 We need to have this project here. We need to have  
10 it work so that the Chinese, as they move from where they  
11 are today to where they will be in 2020 and they're burning  
12 a ton of coal, are sequestering carbon, that they're not  
13 part of the warming problem, they're part of the solution  
14 because we gave them the technology. We sold them the  
15 technology. And that's reason to support this project and  
16 the reason the Environmental Law and Policy Center is a  
17 strong supporter of this project.

18 So I appreciate the opportunity to speak with the  
19 panel; and thank you this evening.

20 (Applause.)

21 MARK MC KOY: The next preregistered commenter  
22 is Alan Shoemaker with the Tuscola Stone Company.  
23 ALAN SHOEMAKER: Hello. I'm Alan Shoemaker,  
24 General Manager of Tuscola Stone Company.

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1 On behalf of our Tuscola Stone Company, I would like  
2 to thank you for your consideration of our community for  
3 your project.

4 Should you select our location, we will stand by and  
5 support your project and your construction needs. Your  
6 proposed site is located just 4 miles from the deepest  
7 quarry of the State of Illinois. We have been in business  
8 and serving this area for over 35 years with 16 full-time  
9 jobs.

10 Our rock reserve is over 300 feet deep. We produce  
11 all types of construction aggregates for our community and  
12 our agricultural limestone for our farmers.

13 We believe it would be an honor to participate in a  
14 project that involves a science that could change the world  
15 to provide energy. We fully support FutureGen. Like every  
16 good project, it begins with a solid plan. A solid plan  
17 must be supported with a solid foundation. It should be  
18 nice to know that materials for your foundation can be  
19 supplied from just four miles away.

20 Thank you very much.

21 (Applause.)

22 MARK MC KOY: The next preregistered commenter  
23 is Dan Kleiss for Cabot Corporation.

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24 DAN KLEISS: Good evening and welcome. I am

1 Dan Kleiss. I'm the Manager of Human Resources for Cabot  
2 Corporation, Tuscola facility. On behalf of our chairman,  
3 I'd like to read a letter that he has written.

4 Dear Mr. McKoy: Cabot Corporation is pleased to  
5 offer this letter of support for the City of Tuscola and  
6 its bid to attract the FutureGen initiative to Eastern  
7 Illinois.

8 Cabot has been an active member of the Tuscola  
9 business community for more than 50 years. During that  
10 time, Tuscola has provided business climate, quality of  
11 life and community values that have greatly contributed to  
12 the successful operation of our manufacturing facility.  
13 Our business and our employees have been able to succeed  
14 and thrive at Tuscola.

15 Tuscola also provides a well-developed infrastructure  
16 that allows convenient access to major cities via railways,  
17 highways and airports. The city's commitment to the  
18 development and maintenance of this infrastructure is  
19 essential for the transport of raw materials and machinery  
20 we require and are necessary for the export of Cabot  
21 products worldwide.

22 The city's well-maintained water and sewer systems,  
23 good schools, affordable housing and parks and other  
24 recreational areas contribute to a high standard of living

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1 for Cabot employees and their families. These and other  
2 amenities help Cabot to attract and retain the skilled

3 labor work force needed to maintain our competitive  
4 advantage.

5 If sited in Tuscola, the FutureGen initiative can  
6 potentially provide an opportunity for the development of  
7 new electricity generation technology with positive and  
8 environmental impacts that would benefit both residents and  
9 businesses.

10 As one of the major employers of the Tuscola area,  
11 Cabot looks forward to learning more about the FutureGen  
12 initiative.

13 Sincerely, Kenneth F. Burns, Chairman and CEO, Cabot  
14 Corporation, Boston, Massachusetts.

15 Thank you very much.

16 (Applause.)

17 MR. MC KOY: The next preregistered commenter is  
18 Reggie Clinton, Arcola School District.

19 REGGIE CLINTON: Good evening and thank you for  
20 the opportunity to speak. Arcola are the neighbors to the  
21 south of Tuscola here. And I want to let the board and the  
22 group doing the study realize that we have officially, the  
23 Board of Education, has gone on record as being in support  
24 of this project.

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1 We feel, not only the benefits of the, this would  
2 bring to our area. Mr. Burgess touched on it earlier. The  
3 Tuscola schools and all the local school districts around  
4 here are able to provide a quality education for the  
5 families and the workers that come here.

6 The other aspect of education I think we missed is  
7 not only what we can provide to the workers and families  
8 but what the workers and families and FutureGen could offer  
9 to our local schools, universities, and community colleges  
10 in the area.

11 One unique thing that I want to mention, that I drove  
12 up here -- I'm from Arcola to the south so that those in  
13 the audience will understand this example -- but FutureGen  
14 recognizes and represents cutting-edge technology,  
15 economically, ecologically friendly. What better picture  
16 to be a PR statement for that, that on one end of the  
17 spectrum you've got FutureGen plant out here and, on the  
18 other end of the spectrum, you have the community of the  
19 simple life people, the Amish community, coexisting,  
20 friendly, together, in that process. I think it's a unique  
21 opportunity that this part of the state offers.

22 We would welcome, and we do welcome FutureGen when  
23 you do locate in Illinois. Thank you.

24 (Applause.)

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1 MARK MC KOY: The next preregistered commenter  
2 is Brian Moody, Executive Director of the Tuscola Economic  
3 Development, Incorporated.

4 BRIAN MOODY: Well, good evening everyone. I  
5 was running around like a busy bee ahead of time and didn't  
6 sign up on the speakers list so I got at the beginning, so  
7 my comments might sound a little strange. Because I was  
8 going to thank you all in advance. So I guess I'm thanking  
9 you at the end now.

10 I want to welcome you all, again, back to the  
11 community on behalf of TEDI, the Douglas County Engineer  
12 Jim Crane, and the Douglas County Task Force for  
13 FutureGen.

14 Our local team really wishes to offer our  
15 congratulations and offer our thanks to the team from DOE,  
16 from FutureGen, from the associated companies and  
17 consultants on the putting the Draft EIS. We really  
18 appreciate both the professional and personal sacrifices  
19 that so many people in this room made to get this document  
20 done, this, to really make this analysis possible. And we  
21 are quite proud of you for doing that, as we are of  
22 ourselves.

23 Our overall review has found that the EIS is  
24 consistent with the information that we provided from the

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1 local task force, and we feel it's a very solid  
2 characterization of our site here in Douglas County. If  
3 you haven't seen it, which I hope you have seen it, it's  
4 truly an impressive document.

5 We also want to make sure we thank the various  
6 members of our local task force, the various government  
7 agencies, the citizens and our local industry partners,  
8 many of whom are here tonight. Without all these folks, we  
9 just would not have been able to provide the information  
10 that was necessary for the environmental impact volume and  
11 then, now, for the Draft EIS. So we owe a great debt to  
12 those folks.

13 To the audience tonight -- I really want to  
14 emphasize, and the reason I wanted to get my name a little  
15 higher on the list -- this is really your night. This is  
16 really your opportunity to comment about FutureGen. We've  
17 been out talking about this project for, forever it seems  
18 sometimes. We hope you've learn a great deal about the  
19 project. We've tried to get that information out to the  
20 best of our ability. But this is really your chance to ask  
21 questions, regardless of, of the talk about positive or  
22 negative and the competition that goes on between the four  
23 sites.

24 It's important for the, for this project, as a whole,

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1 that these comments get made so these folks can look at  
2 these issues and make sure we are considering everything  
3 that might be impacted in the area. That's very important  
4 to us and to me personally. We've done this in an effort  
5 to obtain your true thoughts, your comments and your  
6 concerns. And this way, again, the DOE and the FutureGen  
7 Alliance can address a lot of these concerns.

8 I'm going to say it one more time. We sincerely want  
9 your comments on the Environmental Impact Statement. There  
10 are so many details and so many levels of analysis, and  
11 it's easy for all of us who have worked on this to let  
12 little details slip through the cracks. And so much of  
13 going through the draft versions and all the back and forth  
14 is finding those things and making sure that we have looked  
15 at them thoroughly. So I want to make sure you do make  
16 those comments.

17 Again, I want to thank everyone throughout this  
18 process. We've had exceptional community support, a lot of  
19 people have spent a lot of late nights on a lot of  
20 different projects to get all this work put together.  
21 We've really appreciated it.

22 Thank you, again, for the opportunity to share our  
23 community with you and for your questions today and in the  
24 past. Thank you very much.

0059

1 (Applause.)

2 MARK MC KOY: We have now gone through the list  
3 of preregistered commenters. I'll open it up to the floor  
4 for anyone else who would like to come up and provide a  
5 comment for the first time.

6 Would anyone like to come up and provide comment?

7 Please state your name for the record.

8 TOM LIVINGSTON: Thank you. Good evening. My  
9 name is Tom Livingston, from CSX Transportation. I'm  
10 joined by Scott Walters, from CSX Transportation, who runs  
11 our coal division for the northern part of the country.

12 CSX is the largest eastern US freight railroad. We  
13 are pleased to wholeheartedly support the Tuscola site. It  
14 was accurately said earlier that, that Illinois is a coal  
15 state. That is very true. But it is also a rail state.  
16 And they are linked by history and by industry.

17 Illinois and Tuscola knows how to do coal. They know  
18 how to do rail. There is no more environmentally friendly  
19 way to haul this nation's freights than by rail. It takes  
20 about a gallon of gas to haul a ton of freight 400 miles.

21 So we are convinced that there is the least learning  
22 curve for Tuscola than any of the sites. CSX operates  
23 along 23,000 miles of track, and we see an awful lot of  
24 towns. But we are proud of our association with Tuscola

0060

1 and the organizers here who have the people, energy, and  
2 the talent to join the 17,000 rail employees in the State  
3 of Illinois to make this work and to make it work  
4 successfully.

5 I also want to echo the partnership with  
6 Representative Rose and the Congressional delegation and  
7 the State of Illinois.

8 So we know that Tuscola, from a rail perspective,  
9 gives FutureGen the greatest chance for success, in our  
10 minds, as operators of rail and critical transport for this  
11 project. Thank you.

12 (Applause.)

13 MARK MC KOY: Do we have someone else who would  
14 look to provide oral comment?

15 Yes, sir. Please state your name for the record.

16 GEORGE WINDLAND: I am George Windland. That's  
17 W-I-N-D-L-A-N-D.

18 I would like to talk briefly in regards to the impact  
19 study. Believe me, I did read it three different times.  
20 It's like reading the Federal Register. More of you can  
21 laugh at that than some.

22 First of all, if I may, my involvement with the  
23 project is from a number of standpoints. I, first of all,

0061

24 am the Assistant Fire Chief for the Tuscola Fire

1 Department. I'm responsible for, as the safety officer and  
2 also as the coordinator for a twelve-man, hazardous  
3 material response group.

4 And how did that come about? I had 35 years with the  
5 chemical plant just to the west as a safety requirement for  
6 34 years; and 33 of those years I lived at the plant,  
7 physically lived at the plant. My home was there.

8 So I know the impact of understanding and the  
9 concerns involved in regards to the environmental and the  
10 personal impact. As being the vice-chairman of the LEPC,  
11 which is dictated by the State of Illinois under the Right  
12 to Know Act and also as Cochairman of the Douglas County  
13 Emergency Management Association, we have looked through  
14 the impact study with quite a bit of detail.

15 I certainly want to appreciate this evening. I had  
16 spoke to a number of people around at the different  
17 projects and questioned in regards to a few of the  
18 statements that was made within the impact study.

19 First of all, the amount of exposure to the various  
20 chemicals at one point in the study, they made mention that  
21 it is similar to a petrochemical operation. Well, we, as  
22 Tuscola, have had a lot of experience dealing with chemical  
23 plants.

0062

24 In regards to, a lot of the things I was really

1 concerned, I'm a native of Tuscola. I am not a native of  
2 Tuscola, I'm sorry, but of Illinois. I'm kind of a  
3 transplant. I came out of the industry, the operation in  
4 Peoria, Illinois; and we came down here in 1957 to take  
5 over the fire protection and the emergency response  
6 activities for the plant. We have seen many of these  
7 chemicals, processes, that certainly, that is well  
8 described in the study. It's quite detailed.

9 And being a native of Illinois, I have one question.  
10 I have never seen the Kirkland's snake. You went through  
11 so much depth of detail in the habitat that surrounds our  
12 area is ideal for the Kirkland's snake. I have never seen  
13 one of those. The Indiana bat, I have seen.

14 But we have spent considerable amount of time,  
15 through Joe Victor, as the chairman and coordinator for the  
16 Tuscola Emergency Management, in studying the response  
17 activities, according to your description within the study,  
18 that we feel very strongly that we have the capabilities  
19 that, in case of an emergency, we will be able to respond  
20 for, for any type of activity that may arise.

21 I believe, by reading the information, that looking  
22 at all of the different aspects of the operation itself,  
23 all of these are very proven processes throughout the  
24 country or throughout the world. The thing that FutureGen,

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1 I'm understanding, has done has collectively put all of  
2 this together, these processes here in the Tuscola area.

3 As being associated with the chemical plant and the  
4 concerns that they had initially with available water, one  
5 of the reasons I came to Tuscola to hire in at the USI, at

6 that time, was due to the fact that we were in competitents  
7 with National Distillers in producing alcohol products.  
8 They had a new process; and I wondered as I, many people  
9 have asked today, well, first of all, where is Tuscola.  
10 And I found the same answer that I have given a number of  
11 times. It's 25, 30 miles south of the University of  
12 Illinois. But when I came down, I appeared, when we looked  
13 at the resources and the distribution, and I certainly  
14 appreciate the comments from CS and X -- at that time, when  
15 we came in here, it was B and O was the distribution system  
16 -- that is capable of transporting the products that were  
17 manufactured.

18 But the thing that really hit me is the river that  
19 was flowing into our reservoir and, at that time, the water  
20 system we were providing Apollo water over at Tuscola, as  
21 well as Arcola and our industry. But that river only  
22 starts 28 miles north of here, which was amazing to me how  
23 we could use that vast amount of water and we did. At that  
24 time, we put in 5 artesian wells into the aquifer at

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1 Bondville; and, periodically, during drought season, we had  
2 to pump in. But the drainage and the output of waste water  
3 products certainly supplemented what our needs were, and we  
4 had that retention.

5 We, through the Emergency Response, I believe we have  
6 the capability of providing a safe, working environment.  
7 I'm sure that the company, when building the operation,  
8 will be in compliance with the OSHA requirements, the  
9 Department of Labor through the State of Illinois and also  
10 through the National Fire Protection Association, to  
11 develop their facility.

12 Again, I want to personally thank the gentlemen and  
13 all of the ladies that I had the opportunity to speak to;  
14 and they have refreshed a lot of the information that we  
15 had some questions on.

16 Thank you very much.

17 (Applause.)

18 MARK MC KOY: Do we have someone else who would  
19 like to provide comment?

20 Okay. Please state your name for the record.

21 JAMES YOAKUM: James Yoakum, Y-O-A-K-U-M.

22 James Yoakum, I'm Project Manager from Ambitec  
23 Engineering, a local support person for the large  
24 engineering procurement stress management firm here in

0065

1 Illinois.

2 I've been involved in numerous, industrial  
3 construction projects and operations across both East  
4 Central Illinois and across the nation. I also grew up in  
5 Southern Indiana and was the son of a coal miner. So I  
6 understand the importance of Midwest coal and the  
7 differences between good coal and bad coal and needing to  
8 find a good application for, for the coal we have here. So  
9 I'm very excited about this project.

10 Mainly, as a local technical resource and a resident  
11 of Tuscola, I'm excited about this opportunity and what's  
12 at stake. We have outstanding local, technical resources,

13 contractors and future employees to support all phases of  
14 the FutureGen Project. We're glad you're here. We hope  
15 you stay here.

16 Thank you.

17 (Applause.)

18 MARK MC KOY: Do we have someone else who would  
19 like to provide comment?

20 Please state your name for the record.

21 JOHN KENNEDY: Good evening. I'm John Kennedy.  
22 I'm a manufacturing manager and an intent engineering  
23 personnel at one of our local facilities.

24 I just want to state that, in these days in this

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1 county and in this world, energy is a real commodity. And  
2 there's a lot of not in my backyard attitudes in the  
3 country, in the world, today. And I guess the one thing I  
4 want to state is that you're not going to find that here  
5 with this project in Tuscola.

6 You know, if it was a nuclear plant, there would be  
7 opposition. No doubt. If it was a oil refinery, there  
8 would be opposition; no question. But from the things that  
9 I've seen, the literature that I've read, there's a lot of  
10 positives for this program. And I think that you'll find  
11 that, as a community, we're going to pull together. We  
12 have pulled together. We're going to be active, and we're  
13 going to help bring this to our town.

14 It's a positive thing. I don't see negatives. And I  
15 think it's something that we can all get on board and  
16 support.

17 Thank you very much.

18 (Applause.)

19 MARK MC KOY: Do we have someone else who would  
20 like to provide comment? You might have to waive your hand  
21 around since it's hard, maybe, for me to spot your hand.

22 Yes, sir. Please provide your name for the record.

23 DENNIS HANNER: My name is Dennis Hanner, and  
24 I'm a local resident of this area. I grew up here. My

0067

1 parents raised me and my siblings. I have raised my  
2 children here. My grandchildren, part of them, are being  
3 raised here. And I hope my great grandchildren are.

4 As I look at this project and I've attended the  
5 meetings that we've had in the past, there's been questions  
6 I had.

7 One was the water. Every time an article appears in  
8 the newspaper, I've taken time to read it to find out what  
9 it says and what it's talking about. The water question  
10 has been answered in my mind. The natural habitat question  
11 has been answered in my mind. The safety of the plant has  
12 been answered in my mind.

13 The noise level. Some people ask that. Is there  
14 going to be a problem with the noise. Well, as the crow  
15 flies, we live about a mile from Lyondell. They make  
16 noise, but it is not a problem for our life.

17 I guess the best way of saying it is, I feel  
18 comfortable with the problems with the possibility of  
19 FutureGen being located here. To me, it is a great thing;

20 and it's, I just feel good about it. I guess that's the  
21 best way of saying it.

22 Thank you.

23 (Applause.)

24 MARK MC KOY: Do we have someone else who would

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1 like to provide comment?

2 Yes, ma'am. Please state your name for the record.

3 ANN ROBERTSON: My name is Ann Robertson, and  
4 I'm a resident of Tuscola. And the young man who mentioned  
5 that he had been here for six generations, I'm a little  
6 older than he is. I have, I'm five generations in East  
7 Central Illinois and six generations for Southern  
8 Illinois. So this project is very near to my heart.

9 And I, and I just want to say how pleased I am that  
10 you're here. It's been wonderful to sit here in this  
11 audience and see the wonderful community and the  
12 recognition of the resources that we have here. Because we  
13 do live in a beautiful place. And even though I was raised  
14 in this area, I married an immigrant, and we gallivanted  
15 around the country for about 20 years and lived in other  
16 countries. So I've had the opportunity to see some other  
17 places, and we came back here.

18 And you missed the drought. We had about 3 weeks of  
19 drought here. So the gentleman who said we had abundant  
20 water, a few weeks ago, we wouldn't have said that; and we  
21 would have been a little worried about our crops here.

22 But we do have a lot of resources. Unfortunately,  
23 though, those of you who know me from church know that I  
24 sit in the back pew; and I hardly ever come up to the front

0069

1 of the, of the congregation unless it's to take communion  
2 or something.

3 So this is hard for me to be up here and talk about  
4 this. And I have to raise some issues. And I do have a  
5 few things that I want to share with you, partly from a  
6 book, because I'm a writer/resource person. I'm not a  
7 public speaker.

8 This is a book called Big Coal. This has been  
9 donated to the Tuscola Public Library. And Chapter 9  
10 addresses the Illinois coal industry and talks about  
11 FutureGen, specifically. So, I want to encourage you to  
12 check it out from the library or buy it from your local  
13 book store. Okay.

14 Now, because my eyes are not as good as what they  
15 used to be, I'm going to have to read a few quotes from  
16 this book, just to kind of share with you. So just bear  
17 with me here while I find my place.

18 This book, by the way, was not written by a tree  
19 hugger. We lived in California, and so we were exposed to  
20 the folks that hug the old growth trees. And when I saw my  
21 first one, I realized why they did it. They are beautiful  
22 trees.

23 But this is not one of those people. He's a very  
24 well-respected journalist who has researched coal, the coal

0070

1 industry in depth.

2           And on Page 212 to 213, he talks specifically about  
3 FutureGen or 'NeverGen,' as it's affectionately known to  
4 some people in the industry. He believes and his research  
5 suggests that it will turn out to be just another expensive  
6 government boondoggle. It would be foolish to bet on  
7 FutureGen as a solution to America's energies problems. He  
8 concedes that there are certainly some research potential  
9 in FutureGen.

10           However, it's, he also says that it's hard to fine  
11 anyone without a vested interest in the project who really  
12 believes that FutureGen is anything but an expensive,  
13 political decoy to make it look like the coal industry is  
14 doing something big and important while, in fact, it is  
15 doing very little.

16           Not my words. His words. Based on research.

17           Mr. Goodell gives examples in several areas of the  
18 book that coal companies have a pattern of using decoys  
19 including language like: Clean coal technology.

20           And this buys time for the coal industry so they can  
21 continue to conduct business as usual and cash in before  
22 the economic hurricane of global warming hits.

23           The truth is that coal mining is anything but clean.  
24 And my mother's farm in Southern Illinois, right now, is

0071

1           being threatened by longwall coal mining.

2           Now, one of the things, and I know you're good people  
3 and you have done a wonderful job. We're very happy to  
4 have you here. Okay. But one of the things that irritates  
5 me about FutureGen and the coalition is what a wonderful  
6 opportunity to make the coal companies face up to the  
7 environmentally devastating practices that they are  
8 currently using in coal. And you have not addressed those  
9 issues. And these issues need to be addressed.

10           Anyone here in Illinois can go to Southern Illinois,  
11 and you can see where farmland has been devastated because  
12 of coal mining. There are independent farmers and groups  
13 that have combined in almost a David and Goliath battle to  
14 fight the coal companies and protect their farmland.

15           Now, they aren't against coal mining. They are  
16 against the type of mining methods, right now, that are  
17 destroying their land and the water supplies. So we need  
18 to face up to these realities.

19           I did not get copyright to print out some of the  
20 photographs that are on various web sites now that show  
21 what longwall mining look like, or I would have brought  
22 them with me here tonight. But I encourage you to go and  
23 take a look at some of those web sites or visit over by  
24 Litchfield and some of the other areas in Southern

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1           Illinois.

2           So, on page 251, the author, here, goes and says, the  
3 most dangerous thing about our continued dependence on coal  
4 is not what it does to our lungs or mountains -- and I'd  
5 like to add our fields and water here -- or even our  
6 climate, but what it does to our minds. It preserves the  
7 illusion that we don't have to change our thinking.

8           It is important to see that the barriers to change

9 are not technological but political. And I guess this why  
10 I'm sharing with you today.

11 20 or 30 years ago, FutureGen may have been a great  
12 project. But right now, in fact, I talked with an  
13 environmental policy expert in the Department of Defense  
14 this afternoon; and he believes that by the time FutureGen  
15 is built, if it's built -- by the way the DOD has bought  
16 into solar technology, not coal technology -- he believes  
17 that it will be a dinosaur. And it's moving us in the  
18 wrong direction. We have to focus on sustainable energy.

19 So what does that mean for Tuscola and some of the  
20 other communities that have embraced this and, certainly,  
21 for our state that would benefit so much from some economic  
22 change and some jobs and putting some extra folks to work  
23 here with the wonderful talents that we have. Because we  
24 do. We have all the talent here that you would ever need

0073

1 to do this project. And we have all the support and  
2 education here that you would ever need to do this project.

3 But what if we changed the project? What if we made  
4 it truly sustainable energy? There are a growing number of  
5 scientists that believe that the money spent right now on  
6 coal technology is wasted money, that, in fact, that same  
7 money, spent on solar technology, wind technology, or  
8 biomass would be far better used and a far better support  
9 of our taxpayer dollars.

10 So I'm sharing this with you today, not because I'm  
11 trying to be argumentative; because I'm not. I, in fact, I  
12 tend to be somebody who just wants to encourage and  
13 support; and I'm not a cheerleader, exactly; but you know,  
14 I do want to, to be supportive. But I can't be supportive  
15 of this. You know, I have to be truthful about the issues  
16 that exist.

17 But I do want to provide you with more information.  
18 And what I have done is put together some web sites of  
19 various information regarding sustainable technology and  
20 other choices that we could make rather than moving in this  
21 direction that would truly put us on the map as the future  
22 community.

23 Now, when I was at the coffee shop, they had green  
24 paper; so, of course, I had to put it on green paper. But

0074

1 I'm going to put it over there on the table; and, if anyone  
2 is really interested in seeing an alternative or looking at  
3 some alternatives, it will be over there.

4 Thank you very much.

5 (Applause.)

6 MARK MC KOY: As Ann pointed out, it is often  
7 difficult to come and speak in public when you have a  
8 viewpoint that, maybe, is not consistent with the  
9 viewpoints that are being shared by all of the other people  
10 coming up. And of course, you people have demonstrated  
11 that you're very gracious.

12 We are here to hold this public hearing because we  
13 realize that such a project would have impacts on people  
14 that need to be addressed, need to be considered. We are  
15 here because there are people who have views that maybe

16 aren't entirely consistent with the program.  
17 But the US Department of Energy believes it is very  
18 important for everyone to have an opportunity to speak and  
19 to participate in the process.

20 Do we have someone else who would like to provide  
21 comment?

22 One thing Brian Moody pointed out was that the  
23 document might have some small inconsistencies in it. But,  
24 you know, if it's something that relates to you or to your

0075

1 family or to your property, it's not a small inconsistency  
2 or a small thing to you. It can be a very large thing.

3 And, again, it's very important that we get to hear  
4 these things. So, I don't want you to be afraid to come up  
5 here and speak. If you are not comfortable coming up here  
6 to speak, again, don't hesitate to write a letter or to  
7 send an e-mail or to use the comment cards to provide us  
8 with your thoughts, your concerns.

9 Is there anyone who would like to come up and provide  
10 comment?

11 You know, one comment I heard very early on; and I  
12 can't remember exactly who said it -- I think maybe it was  
13 State Representative Chapin Rose -- that this community was  
14 beautiful. And, you know one of the things that I  
15 noticed and I think all of us working on the Draft EIS  
16 noticed when we came into this area, was that the community  
17 was, indeed, beautiful here.

18 The streets are clean. The houses are neat and  
19 nicely kept. And everything around here is in order. This  
20 is really an ideal community to be in. And it really is a  
21 wonderful place. We've had a fantastic time here this  
22 week. We have really enjoyed it.

23 (Applause.)

24 We'd like to gather more comments. Is there anyone

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1 else who would like to come up and provide comment?

2 Maybe I'm not seeing the hands that are waiving.

3 I am very happy with the large turnout. This is  
4 fantastic.

5 Okay. Well, let me get one thing. I'll grab my  
6 notes here so that I can formally close out the hearing if  
7 no one else wants to provide comment. But, again, would  
8 anyone like to provide comment?

9 And again, if you want to talk to me, as soon as the  
10 hearing is over, you know, I'll be happy to talk with you  
11 then or any other time. You can give me a call. I'll be  
12 happy to talk with you on the phone. That's not a  
13 problem. I'd love to talk with you.

14 Okay. Thank you for your comments and  
15 participation. Remember that you may submit comments until  
16 July 16, 2007.

17 This concludes the public hearing for the FutureGen  
18 Project. Let the record show that this hearing adjourned  
19 at 8:58 p.m.

20 Thank you.

21  
22

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Which were all the proceedings had and entered

23 of record at the Department of Energy's Public Hearing for  
24 the FutureGen Project.

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1 STATE OF ILLINOIS )  
 ) SS  
2 COUNTY OF DOUGLAS )  
3

4 C E R T I F I C A T E

5 I, Susan Bursa, a Notary Public and Certified  
6 Shorthand Reporter, do hereby certify that on the said date  
7 the foregoing proceedings were taken down in shorthand by  
8 me and that the foregoing transcript contains a true and  
9 accurate transcription of all such shorthand notes.

10 I further certify that I am a disinterested  
11 party to the proceedings herein and that I am not a  
12 relative of any of the parties hereto, that I am not in the  
13 employ of any of the parties hereto, and am not otherwise  
14 interested in the outcome of this hearing.

15 In witness whereof, I have hereunto set my hand  
16 and affixed my seal this 18th day of July, A.D. 2006.  
17  
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Notary Public and  
19 Certified Shorthand Reporter  
License No. 084-3615.

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**Errata for the Transcript of  
the U.S. Department of Energy  
FutureGen Public Hearing**

**June 21, 2007  
Buffalo Civic Center  
Buffalo, Texas**

9 Acronyms Used

10 CD – Compact disc  
11 CO2 – Carbon dioxide  
12 DOE – Department of Energy  
13 EIS – Environmental Impact Statement  
14 NEPA – National Environmental Policy Act  
15 NETL – National Energy Technology Laboratory  
16 NOx – Nitrogen Oxides  
17 PHE – Potomac Hudson Engineering, Inc.  
18 R&D – Research and development  
19 TCEQ – Texas Commission on Environmental Quality  
20

21 Page 6

22 Line 1 – Change “Hoffman” to “Hoffmann”  
23 Line 4 – Change “Wilham” to “Gwilliam”  
24 Line 10 – Change “Thomas” to “Potomac”  
25 Line 10 – Change “TETRA” to “Tetra”  
26 Line 11 – Change “Lewis” to “Louis”  
27 Line 16 – Change “NEPA Document Manager” to “Project Manager”  
28 Line 17 – Delete “the”  
29 Line 18 – Change “P.Hd” to “PHE”  
30 Line 19 - Change “TETRA” to “Tetra”  
31 Line 19 - Change “Lewis” to “Louis”  
32

33 Page 9

34 Line 21 – Insert “the” after “...down to...”  
35

36 Page 12

37 Line 1 – Insert “who” after “It is we...”  
38 Line 12 – Change “noxin” to “NOx”  
39 Line 14 – Delete “a” after “...and it’s...”  
40

41 Page 14

42 Line 3 – Change “Batel” to “Battelle”  
43 Line 9 – change “group” to “Group”  
44 Line 20 – change “is” to “are”  
45

46 Page 15

- 1 Line 3 – Insert “of a” after “more”
- 2 Line 11 – Change “challenge” to “challenges”
- 3 Line 14 – Change “Batel” to “Battelle”
- 4 Line 17 – Change “foot” to “feet”
- 5 Line 21 - Change “foot” to “feet”
- 6
- 7 Page 16
- 8 Line 15 – Change “a” to “The”
- 9 Line 15 – Change “group” to “Group”
- 10
- 11 Page 18
- 12 Line 18 – Change “So the bottom to me is – line is is...” to “So the bottom line to me
- 13 is...”
- 14
- 15 Page 19
- 16 Line 3 – Change “environment” to “environmental”
- 17
- 18 Page 29
- 19 Line 9 – Change “submits” to “emits”
- 20 Line 15 – Change “there is” to “there are”
- 21 Line 24 – Change “noxin” to “NOx”
- 22
- 23 Page 30
- 24 Line 21 – Change “T.C.E.” to “T.C.E.Q.”
- 25
- 26 Page 30
- 27 Line 4 - Change “T.C.E.” to “T.C.E.Q.”
- 28 Line 10 – Delete “.” after “T.C.E.Q.”
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UNITED STATES DEPARTMENT OF ENERGY

DRAFT ENVIRONMENTAL IMPACT STATEMENT HEARING

JUNE 21, 2007

BUFFALO, LEON COUNTY, TEXAS

\*\*\*\*\*

1                   MR. McKOY: Welcome to the Department of  
2 Energy's Public Hearing for the FutureGen Project. Let the  
3 record show that the hearing began on June 21st, 2007, at  
4 7:03 p.m. at the Buffalo Civic Center in Buffalo, Texas.

5                   As part of its compliance with the National  
6 Environmental Policy Act, the DOE has produced a Draft  
7 Environmental Impact Statement, or EIS. This document analyzes  
8 the potential environmental impact at the alternative sites for  
9 the proposed FutureGen Project. Both the document and the  
10 comments received should help DOE in making better informed  
11 decisions.

12                   The Draft EIS has been distributed to persons  
13 who have previously expressed some type of interest in the  
14 project. If you previously requested a copy of the document  
15 and have not received it, please provide your mailing address  
16 and name to Rachel Spangenberg, Rachel is back here near the  
17 entrance, provide that information to her and we'll try to get  
18 a copy to you as quickly as we can. Also please indicate to  
19 Rachel in what form you would like to receive the document.

20                   Furthermore, there are comment cards available  
21 that can be used to request a copy of the Draft EIS as well as  
22 the Final EIS. These cards are located at the DOE exhibits  
23 back in the exhibit area. The document is available in three  
24 forms. It's available in electronic form on a CD, you can get  
25 a hard copy of the summary plus a CD with the entire document,

1 or you can get the entire document in hard copy form. We have  
2 with us this evening a limited number of hard copy summaries  
3 and CDs.

4                   After the Draft EIS is distributed to the public  
5 a public hearing is held to help gather comments on the  
6 documents and on the proposed federal action.

7                   During the informal session earlier this  
8 evening, between 4:00 and 7:00 p.m., DOE and its support  
9 contractors as well as representatives of the FutureGen  
10 Alliance and the local site proponents; that is, the FutureGen  
11 Texas Heart of Brazos team, were available to listen to your  
12 concerns and to attempt to answer your questions. We hope this  
13 session was as informative for you as it was for us.

14                   During the formal session tonight we will  
15 briefly present the role of DOE and we will go over the  
16 relevant parts of the NEPA compliance process and the remaining  
17 schedule and the FutureGen Alliance will briefly present an  
18 overview of the FutureGen Project. Then we will begin the  
19 formal comment session.

20                   As with the scoping meetings held in August, we  
21 will give priority to elected officials and their designated  
22 representatives to go first. However, DOE realized that during  
23 the scoping meetings the general public had to wait a long time  
24 before having the opportunity to speak. This time with the  
25 assistance and cooperation of elected officials, we hope to

1 give the general public an opportunity to speak sooner this  
2 evening.

3           We hope that all of you can stay for the entire  
4 oral comment session. For those of you who cannot stay or for  
5 those of you who do not feel comfortable speaking in front of a  
6 large audience, we do have a separate comment session located  
7 at the back and there should be someone there who could make a  
8 transcript. While we prefer that you provide oral comments  
9 here during the formal oral comment session later this evening,  
10 the comment session located in the back is available as an  
11 alternative.

12           Written comments are given equal weight, but the  
13 oral comments and written comments tend to be crafted more  
14 clearly and can be written at your convenience. You may  
15 provide written comments instead of, or in addition to, oral  
16 comments.

17           Again, there are comment cards available at the  
18 DOE exhibits. You can fill out the cards and submit them  
19 tonight or any time before the close of the comment period on  
20 July 16th. You can also provide comments by email, by regular  
21 mail, by faxes, by voice mails and by telephone calls as  
22 indicated on the literature that's available at the DOE  
23 exhibits.

24           On our agenda tonight we will have a  
25 presentation on DOE's role in the project. That presentation

1 will be provided by Tom Sarkus. Tom is with the Department of  
2 Energy, National Energy Technology Laboratory in Pittsburgh.  
3 There will also be an overview provided by Jerry Oliver, the  
4 Senior Vice President for the FutureGen Alliance, and I will  
5 provide a brief overview of some of the most relevant points of  
6 the NEPA compliance process as well as the schedule, and  
7 finally we will get to the comments provided by you.

8                   Visiting with us tonight, we have Michael  
9 Williams, Texas Railroad Commissioner. Please stand, Michael.

10                   Lindsay Davis and Chris Turner, representing  
11 Congressman Chet Edwards. Would you please stand?

12                   Barry Joe Curley, representing State Senator  
13 Steve Ogden.

14                   Byron Ryder, Leon County Judge.

15                   Daniel Burkeen, Limestone County Judge.

16                   Linda Grant, Freestone County Judge.

17                   Jan Rowe, Robertson County Judge.

18                   Judy Kirkpatrick, Mayor of Jewett.

19                   And Roy Hill, Mayor of Fairfield.

20                   Representing the Department of Energy, again,  
21 Tom Sarkus. He's with the DOE office in Pittsburgh. Tom is  
22 the DOE Project Director for FutureGen. Tom is with the Office  
23 of Coal and Power, R & D.

24                   We have Otis Mills with DOE in Pittsburgh. Otis  
25 is our media relations expert. Otis.

1                   Jeff Hoffman, DOE-Pittsburgh. Jeff is an  
2 assistant engineer working on the project with us.

3                   Recently joining the DOE FutureGen team is Bill  
4 Wilham, a geologist with DOE in Morgantown.

5                   And of course myself, Mark McKoy. I'm the DOE  
6 Environmental Manager and DOE NEPA Document Manager for the  
7 FutureGen Project.

8                   I also would like to acknowledge the team that  
9 has worked so hard to put together the Draft EIS. That  
10 document was prepared by Thomas Hudson Engineering plus TETRA  
11 Tech plus Lewis Berger.

12                   We have with us this evening Fred Carey, the  
13 president of Potomac Hudson Engineering.

14                   And the person who has had to endure the most in  
15 putting this document together, assembling it, making  
16 everything work with it, Debra Walker, the NEPA Document  
17 Manager with the Potomac Hudson Engineering.

18                   I would also like to recognize all of the P.Hd  
19 team, TETRA Tech, and Lewis Berger people here who have worked  
20 so hard on the project. Would you either stand up, step  
21 forward or something.

22                   And now it's time for a few presentations to  
23 provide you with some background information regarding the  
24 project. Here is Tom Sarkus with DOE's role in the project.

25                   MR. SARKUS: Good evening and welcome to the

1 Draft Environmental Impact Statement Hearing.

2                   This is a nighttime photo of Tampa Electric's  
3 Integrated Gasification Combined Cycle Power Plant. It is one  
4 of just two coal based IGCC plants in the United States, and  
5 I'm proud to often say that I had the distinct privilege of  
6 supervising the DOE sponsorship in both of them, and it's only  
7 one of six in the world. As you can see from the photo, this  
8 is not your father's coal based power plant. It is the top  
9 dispatcher number one unit in Tampa Electric's generating  
10 system and it's been operating commercially since September of  
11 1996. Going on 11 years. With operational plants having  
12 designs that are in most cases over ten and approaching fifteen  
13 years old, it's time to build upon the lessons from these early  
14 pioneer plants and to bring on the next generation of clean  
15 coal technologies: FutureGen.

16                   When the Wabash River in Tampa gasification  
17 facilities were designed in the early 1990s, key external, or  
18 environmental drivers, were things like sulfur and nitrogen  
19 oxide emission. They were relevant at that time to the problem  
20 of acid rain. We also had to focus on technical challenges  
21 like combining and effectively integrating the many pieces of a  
22 gasification power plant with a combined cycle power plant, or  
23 turbine as you may hear.

24                   Today we have additional drivers, environmental  
25 drivers, such as mercury emissions and CO<sub>2</sub>, and of course CO<sub>2</sub>

1 is relevant to climate change. These drivers will require us  
2 to integrate even additional pieces and processes into the coal  
3 based IGCC plants of tomorrow. And we feel that FutureGen is  
4 going to be a prototype for future power plants.

5           You've probably heard about FutureGen in a  
6 context of a technology based strategy to address the problem  
7 of climate change; that is, FutureGen will produce and separate  
8 hydrogen and carbon dioxide. If we will use the hydrogen to  
9 produce electric power and we will then store, the technical  
10 word that we use a lot is sequester, but it basically means to  
11 store, geologically the CO 2 in deep saline aquifers.

12           This slide pairs the major CO 2 sources with  
13 nature's CO 2 storage reservoirs in North America. I'm often  
14 asked, Tom, is there enough storage capacity for all the CO 2  
15 from power plants? Well, this slide shows that we produce 3.8  
16 gigatons a year of CO 2 and we have 3,800 gigatons of CO 2  
17 storage in saline aquifers. Actually, that's a conservative  
18 estimate. Some estimates run as high as double that, but let's  
19 use the conservative estimate. That should be more than enough  
20 CO 2 storage capacity underground to supply a thousand years of  
21 all the CO 2 produced in North America at current rates. That  
22 should be more than enough for us given that we only have a 250  
23 year supply of coal at current levels.

24           FutureGen is currently estimated to cost 1.757  
25 billion dollars, or rounded to 1.8 billion dollars. That

1 includes approximately one-and-a-half, or 1.5 billion dollars  
2 to design and build the plant and the geologic storage facility  
3 plus about three hundred million dollars to operate those  
4 facilities for three years. It's estimated that FutureGen will  
5 generate approximately three hundred million dollars in  
6 electricity revenues, which will be used largely to offset the  
7 cost of operation. FutureGen is being implemented through a  
8 cooperative agreement between the Department of Energy and the  
9 FutureGen Industrial Alliance. The Alliance consists of 12  
10 coal mining and coal based electric power companies, and all of  
11 their corporate logos are shown here.

12                   The cooperative agreement between the Department  
13 of Energy and the FutureGen Industrial Alliance is structured  
14 around six budget periods which are shown on this schedule. We  
15 recently transitioned from what we call Budget Period Zero, and  
16 that was Project Structuring and Conceptual Design, into Budget  
17 Period One, which is Preliminary Design. Over the past year,  
18 much work, as you know, has focused on site selection and  
19 conceptual design. We had, the Alliance had an initial  
20 competition. They received 12 proposals and it whittled it  
21 down to four best candidates, including Jewett.

22                   Over the next year some of that focus will shift  
23 towards selecting technology and equipment suppliers for the  
24 major portions and project. Design will continue into the  
25 spring of 2009 and construction will then begin and we will run

1 through 2011 followed by shakedown and start-up. We expect to  
2 begin commercial operations of FutureGen by the end of 2012.

3           DOE and the FutureGen Alliance are splitting the  
4 project cost with 74 percent to DOE and 26 percent to the  
5 Alliance. As for international participation, foreign  
6 companies may join the Alliance as equal members while foreign  
7 government contributions are counted on the government side of  
8 the project ledger. We hope to secure at least 80 million  
9 dollars from foreign governments at 10 million dollars each,  
10 and so far four countries have announced their intention to  
11 join. Those are India, South Korea, China and Japan, and DOE  
12 is currently working to develop an international agreement to  
13 facilitate that.

14           Here's my contact information. Thanks for your  
15 kind attention. I look forward to hearing your comments later  
16 in the hearing.

17           MR. McKOY: Thank you, Tom. Next will be a  
18 project overview presented by Jerry Oliver, Senior Vice  
19 President for Project Development with the FutureGen Alliance.  
20 He will provide a project overview and update.

21           MR. OLIVER: Good evening. It's really, really  
22 good to be back in The Heart of Brazos. I was here nine months  
23 ago and it rained the day I was here and it rained again so  
24 that's good, huh? And it really is amazing to me it's been  
25 nine months though. We have accomplished a lot, and when I say

1 we, that includes the Department of Energy, it includes your  
2 team here in The Heart of Brazos, it includes the state team,  
3 the Texas FutureGen team, it includes the Alliance, the  
4 Alliance members and our Alliance partners who will talk about  
5 it. We couldn't have done it without everybody, and I'll try  
6 to go through that a little bit tonight and try to explain it,  
7 but to me the nine months has gone by as it was just a few  
8 weeks. So I'm really pleased to be back.

9 I did want to make a comment about the video  
10 which they showed. We did show it at our Board of Directors  
11 meeting, we also showed it at our technical meeting, and so  
12 copies of that have essentially gone around the globe. So  
13 Jewett is now pretty well-known across the world so just so you  
14 know you are no longer just a small community.

15 Okay. Let me give you some background. This is  
16 the world's first, or it will be, the world's first near zero  
17 emission coal fuel power plant. We're going to take out 90  
18 percent of the CO 2 and we're going to put at least a million  
19 tons of that underground and store it, as he said, sequester  
20 it.

21 We're also going to build this as a research  
22 platform. So instead of being a commercial plant, the idea is  
23 to allow us to push the envelope on technology and to create  
24 essentially a living laboratory.

25 It is a global public-private partnership and we

1 can't do this without everybody's involvement. It is we are  
2 really trying to do too much and if we can't get the support of  
3 both the communities involved and the people that are trying to  
4 do this it will not work.

5                   So we have some very clear objectives with the  
6 project. We're now designing the plant, we're going to build,  
7 and we're going to operate one that is near zero emissions.  
8 We're going to, as I said before, put a million tons a year of  
9 CO 2 underground and leave it there and understand what the  
10 implication of that is and what the meaning of that is.

11                   We're also going to generate very low levels of  
12 noxin, particular matter, and of mercury. We're going to take  
13 what we do and make sure that it gets out into the rest of the  
14 world. Because if you do this and it's a one off, we fail. So  
15 the idea is that we take the technologies that we develop and  
16 make sure that they're accepted and that we're actually doing  
17 things that are environmentally designed that are also  
18 commercially feasible so that the world will use them, and what  
19 we do design in this plant will also be something that the rest  
20 of the globe will take on.

21                   Why do we need it? We need it because this  
22 project provides us with a real opportunity to understand the  
23 implication of taking CO 2 out of the power plant and putting  
24 it underground and do that on a continuous basis and understand  
25 what happens to it when it's under. We are also going to have

1 the opportunity to really push technology in this plant.  
2 Because it is a research platform and not a commercial project,  
3 we basically can actually take every piece of that and we can  
4 push it beyond what you normally would do.

5                   We also are quite far along, and I think that we  
6 can continue to move because we really don't have the normal  
7 commercial drivers, we have the driver to create a plant that  
8 will take technology into the future out across the globe. So  
9 we have a different set of drivers than a normal commercial  
10 project. And we have international participation. The key is  
11 is to make sure that they're actually actively involved so that  
12 what we do is taken out into the world.

13                   As Tom said, we have 12 companies that are part  
14 of the Alliance. They represent in the U.S. 20 percent of the  
15 electric power, 40 percent of the coal, around the globe,  
16 they're on every continent, and -- and -- and basically  
17 covering the breath of what you can do with power and coal and  
18 coal-related technologies. We are a nonprofit 501-C. So we're  
19 set up, we're -- what the Alliance members do essentially is  
20 donate money to this, they don't really have anything to get  
21 out of it other than the value, the goodness that's created by  
22 doing what we're trying to do.

23                   The government is involved as well in the same  
24 way and they're involved through the Department of Energy. As  
25 Tom said, they're bringing in other countries, other

1 governments into the program. In addition we have some  
2 tremendous support, and tonight you had a lot of people here  
3 from Batel. Batel is our partner taking care of the  
4 underground, the subsurface for sequestration. They're also a  
5 general manager, contractor that work with us. They're also  
6 one of the premier R & D organizations in the United States.  
7 We take full advantage of experts across the globe and we use  
8 them in every act that we do. And we just recently took on the  
9 Washington group as our engineer, as we go forward, our  
10 construction manager, and they are now playing a big role in  
11 the project.

12                   We're going to go -- we're going to advance IGCC  
13 technology by pushing the -- the envelope on coal that can be  
14 bedded. We're going to use eastern, western coal. We'll also  
15 test lignite. So we will in fact run coals from Texas as well  
16 as coals from the rest of the United States.

17                   We are going to push, as I said earlier, every  
18 aspect of the project. We're going to basically try to make  
19 sure that the gasification technology used here is as good as  
20 we can get. We're going to push the fact that there is no  
21 hydrogen turbines. We will in fact have one that will operate  
22 hydrogen and essentially every part in between. We're going to  
23 integrate the CO 2 capture with operating a power plant, which  
24 is no easy thing. Just taking the CO 2 and putting it  
25 underground is one thing, but to have -- to create the

1 redundancy in a power plant so that you can actually make sure  
2 that the CO 2 goes underground is -- is a -- it's a little bit  
3 more challenging aspect of the project.

4           And lastly, and probably uniquely, we're going  
5 to give ourselves the opportunity to test new technology, the  
6 living laboratory concept, and have purse strings that will  
7 take technologies that are developed in the laboratory in the  
8 United States and elsewhere and take them from the scale  
9 they're at into something more commercial and then move those  
10 into the -- into plants like this in the future. So a lot of  
11 challenge but clearly a lot of opportunity to succeed with the  
12 goals we have.

13           In the sequestration area, the models that are  
14 being created by Batel right now and that are actually being  
15 worked on as well in the state of Texas are going to push the  
16 envelope in what you can really do to look at underground,  
17 8,000 foot down, what happens to CO 2. We're going to push  
18 what we call the monitoring system, the MMV system, beyond what  
19 is currently done so that we can understand at essentially all  
20 levels what's going on with CO 2 in a fairly complex  
21 environment, 8,000 foot below the ground, 6 to 8,000 foot below  
22 ground.

23           And lastly, to build on the comment that Tom was  
24 making, that if you do this and you put your CO 2 long-term  
25 into saline formations instead of up into the air, there is a

1 lot of storage projection, in the United States a thousand  
2 years, but the numbers, if you look on the left-hand side of  
3 this, there's actually 11,000 gigatons at least of storage  
4 capacity around the globe. So not only can we take care of  
5 CO 2 for -- for the United States, but if the technology is  
6 adopted there will be plenty of CO 2 underground around the  
7 globe for the next 500 to a thousand years.

8                   Right now we're -- we're transitioning  
9 conceptual designs and preliminary designs. We've been working  
10 on a lot of alternative ways to build this plant. We've been  
11 trying to make sure that we keep it fuel flexible, which is a  
12 challenge in itself. We have taken a lot of offered ways to do  
13 this down to three and we've costed those out, and since I was  
14 here last and -- and done material balances so we know what  
15 that's worth. What we're doing now with a Washington group is  
16 taking it down to one, and -- and as we come down to one we're  
17 going out into the market asking the vendors, the people that  
18 can build or that have technology for the parts of the plant to  
19 step up and help us come up with what we're going to need to  
20 make this thing work. So it -- it -- from a surface side and a  
21 subsurface we're moving the -- essentially moving the ball  
22 forward so we can be in the field as quickly as possible.

23                   Tom showed you 1.8 billion; I show 1.5. You got  
24 to keep in mind in the difference of numbers, three hundred  
25 million dollars, wholesale, or whole purchases, which will

1 offset with the sale of electric power, so the capital number  
2 is 1.5 billion in -- in dollars today.

3           The only other thing on this, because we've  
4 already showed you the schedule and so on, is that we are going  
5 to break ground in 2009, I told you that back last year in  
6 August, we're stilling do that. We've had a delay and we've  
7 had some slowdowns, we're here a couple of months late, but  
8 it's not going to change when we start. We're also going to  
9 have the plant operational in 2012. That is our goal. I think  
10 we can still make it.

11           Okay. So currently what we're doing is we're  
12 working on a preliminary design of both the surface and  
13 subsurface. We're doing a lot of work with the technologies  
14 that are possible to go into this facility. We are working on  
15 the -- with -- with each one of the four sites on due diligence  
16 on looking at their offers that they made a year ago and  
17 understanding every piece of it. We've just finalized the  
18 guidance for the best and final offer and we've been supporting  
19 the Department of Energy in the -- in the EIS process over the  
20 last year, and that -- that's a big piece of the work in  
21 addition to everything else.

22           So -- so where are we? We just sent to the --  
23 to the state team and to your local Heart of Brazos team last  
24 Friday guidance on the best and final offer. We've asked for  
25 the proposal to come back to us on August the 1st. The 29th of

1 October, if we stay in the same schedule, the Department of  
2 Energy will make a decision, record of decision on the four  
3 sites. If they do that, in November we'll pick a site, and as  
4 far as I'm concerned the day after we pick a site I'll be at  
5 that site with a team. So there -- we will start as soon as we  
6 can. We are -- we are definitely making sure that we're ready.

7                   So the bottom to me is -- line is is that the  
8 project's moving, it's moving fast, we are on track. We are  
9 happy to be here. I'm really interested in comments as well  
10 and appreciate the opportunity to give you an update. Thank  
11 you very much.

12                   MR. McKOY: Thank you, Jerry. I went over the  
13 relevant aspects, or fine points at NEPA for you at the Scoping  
14 Meeting last August, but I realize there may be some people  
15 here who were not present during that meeting. I'll go over a  
16 few of the most salient points again and touch on whatever else  
17 is of importance in the NEPA process at this point in time.

18                   NEPA stands for the National Environmental  
19 Policy Act. It is a federal law, a federal statute. It became  
20 effective January 1st, 1970, and it applies to all federal  
21 agencies. It does not apply to state agencies. It does not  
22 apply to local government or to individuals or private sector  
23 organizations, only to the federal government agencies. It has  
24 often been called the national charter for protection of the  
25 environment because it was the first statute to comprehensively

1 address potential impact to the environment from at least  
2 federal action.

3           It promotes environment consideration in the  
4 decision-making process. The NEPA mandate is that  
5 environmental information must be available to public officials  
6 and citizens before federal decisions are made and before  
7 federal actions are taken. It must be based on high quality  
8 information. The scientific analyses involved should be  
9 accurate. There is an obligation to provide the document to  
10 federal agencies having relevant expertise so that they can  
11 review and comment on the document. And in fact we provide the  
12 document to state agencies, local government who can also  
13 provide comment on the document.

14           Most importantly, we're required to provide an  
15 opportunity for the public to participate. So the purpose of  
16 this public hearing that we are at tonight is to invite  
17 comments from interested or affected persons and organizations  
18 on the Draft Environmental Impact Statement. Appropriate  
19 comments would focus on the adequacy of the EIS, the merits of  
20 the alternatives, and the proposed federal action especially  
21 relative to potential environmental impact.

22           We are at the middle of the process. We have  
23 prepared a Draft Environmental Impact Statement and put that  
24 out to the public for the public to review. We will take the  
25 comments that we receive and use those comments to prepare the

1 Final EIS. The Final EIS will then be put out to the public  
2 for their review also. No sooner than 30 days thereafter the  
3 Department of Energy may issue a record of decision.

4                   DOE does have some responsibilities in the  
5 process. DOE must consider public comments both individually  
6 and collectively. DOE must respond to public comments in the  
7 Final EIS in one of the following ways: DOE can modify the  
8 alternative, evaluate alternatives not previously given serious  
9 consideration, DOE can supplement, improve, or modify the  
10 analyses and make factual corrections. Otherwise DOE must  
11 explain why comments do not warrant further agency response.  
12 We will take all of the substantive comments and include them  
13 in the Final EIS.

14                   As I said a moment ago, we are at the middle of  
15 the process. So we have now gotten to the point where we are  
16 conducting the public hearings as shown there for June of this  
17 year. We hope to have the Final EIS distributed to the public  
18 sometime in September and that would allow us to have a record  
19 of decision in October of this year.

20                   DOE does want your participation. We take this  
21 process very seriously. We want to hear from persons who are  
22 interested or affected, particularly if they have concerns  
23 about the project or if they do not want the project we want to  
24 hear from them. Please send your comments to me. That is if  
25 they are written comments send them to the NEPA document

1 manager, Mail Stop N03, P. O. Box 8840, Morgantown, West  
2 Virginia, 26507-0880. You can send email to  
3 FutureGen.eis@netl.doe.gov. Keep in mind the comment period  
4 closes July 16th so if you're sending a letter or a comment  
5 card through the mail it needs to be postmarked by that date.

6                   This is the time to begin the formal comment  
7 period when the public is invited to provide oral comments  
8 regarding the adequacy of the EIS, the merits of the  
9 alternatives, or the proposed federal action. For those of you  
10 providing oral comments, we ask that you keep your comments to  
11 within a five-minute time frame. This allows us to make sure  
12 everyone has an equal opportunity to provide comments. You may  
13 speak a second time after everyone has a first chance to speak.

14                   It is important to make your views known either  
15 now in oral statements or in writing. Again, I urge you to use  
16 the comment cards, they look like this, they're located at the  
17 back. If you would like to receive a copy of the Final EIS put  
18 your name and address on the card. At the bottom please check  
19 the box that indicates whether you would like a hard copy or a  
20 CD. If you would like to use the card to request a copy of the  
21 Draft EIS, which is available now, please write in the comment  
22 section that you would like to receive a draft and in which  
23 form you would like to receive it. There's room here to write  
24 some comments. You can hand these in tonight, you can put a  
25 stamp on the back and mail them to -- to me any time before

1 July 16th, and, of course, you can send the comments through  
2 other means such as writing emails, formal letters, whatever.  
3 Again, all comments will be considered equally as we continue  
4 to develop the Final EIS.

5 I'll quickly go through the rules for the  
6 comment session. Again, five minutes per speaker please. I'll  
7 try to make sure there are at least two opportunities to speak  
8 provided time allows. We will let government officials and  
9 preregistered speakers go first. A transcript is being made.  
10 We have a court reporter here. So when you come to the  
11 microphone to speak please state your name, please speak  
12 clearly, and it may be necessary that you spell your name also  
13 for the court reporter. A copy of the transcript of this  
14 meeting will be available at the Fairfield City Library within  
15 a few weeks and will be part of the Final EIS.

16 Okay. It's time to start with the commenters.  
17 The first commenter will be Michael Williams, the Texas  
18 Railroad Commissioner.

19 MR. WILLIAMS: Mark, thank you. On behalf of  
20 Governor Perry, myself, as well as the FutureGen Texas team,  
21 let me welcome you to an area in your home quite frankly. You  
22 know, I've spent most of the afternoon, morning and afternoon  
23 with Governor Perry in Houston and I would be remiss if I did  
24 not say thank you to The Heart of Brazos team, Tom, you and  
25 your folks, for all of the hard work you put in to helping the

1 state capture this project, and I'd also be remiss if I did not  
2 say thank you, Tom, to you and Mark, and of course Jerry, for  
3 what you've been doing with us and working with us.

4 I only have one substantive comment as it  
5 relates to the NEPA process and to the EIS because I'm going to  
6 leave it to -- to perhaps others to make our official comment,  
7 and that is quite frankly to say what I've said before is that  
8 we commend the fact that the project, that the -- the analysis  
9 was thorough, was concise, and we appreciate the sort of  
10 relationship that we've had with you working through this.

11 Jerry, you had mentioned, as I get ready to  
12 leave, you mentioned that you came to this area nine months  
13 ago?

14 MR. OLIVER: In August.

15 MR. WILLIAMS: In August, you came back today,  
16 and I think there's something about the third time being a  
17 charm. So I look forward to you coming back to Texas on the  
18 day after the decision is made, because as we said in the  
19 video, in the DVD, you bring FutureGen to Texas, we'll do you  
20 right. Y'all take care now.

21 MR. McKOY: Thank you, Michael. Those were  
22 compliments. Of course with the document approaching nearly  
23 2,000 pages I'm not sure if it's concise, but we do appreciate  
24 the compliments.

25 The next commenter is Byron Ryder, Leon County

1 Judge.

2 MR. RYDER: Byron Ryder, Leon County Judge. I  
3 just want to tell you, first of all thank you for being here,  
4 it's a great support. We couldn't do this without you and it's  
5 taken all these people in this room to get this to this point.  
6 There's people behind the scenes doing things, but because of  
7 your enthusiasm and your push on us we have gone this far, and  
8 I think just a little bit more push and we're going to have  
9 them here for the third time like we talked about. But we  
10 definitely want them here for the third time. I do believe  
11 that. Don't we, is that right? You know, there's been three  
12 real important people, other than all the volunteers, but we've  
13 had Nucor Steel, Westmoreland Coal, NRG, those people have  
14 supported this 100 percent. They have been behind us, they've  
15 given us all the support we need, they've given information we  
16 need, and we need to give them a hand. I would appreciate it  
17 right now.

18 And as for the DOE, they have done an  
19 outstanding job with this environmental statement. They are  
20 very -- have done a good, they've been very thorough, have  
21 treated us very well I feel like in the -- in the statement,  
22 and we commend very much to -- to -- maybe this particular  
23 statement will be the winning statement, not maybe, it will be  
24 the winning statement. And we need, we want them here, and  
25 we'd like to welcome you back any time. Thank y'all very

1 much.

2 MR. McKOY: The next commenter is Daniel  
3 Burkeen, Limestone County Judge.

4 MR. BURKEEN: I'm Daniel Burkeen, Limestone  
5 County Judge, and I'll try to be brief. I want to join in  
6 Judge Ryder's comments that he made appreciating those folks,  
7 and I also want to thank Judge Ryder for all the work he's  
8 done. He's been very actively involved in this project here in  
9 Leon County and in the area, so we appreciate all that he's  
10 done.

11 We're excited about this project over in  
12 Limestone County. We've got the NRG power plant there, we've  
13 got a very good working relationship with NRG. We've had a  
14 coal powered plant there for a long time in Limestone County.  
15 We've got a good working relationship with them. They've been  
16 a very vital part of our community. We're looking forward to  
17 FutureGen. The environmental processes involved in FutureGen  
18 are exciting. They're an exciting part of the future worldwide  
19 and we're excited to have this prototype plant I'm hoping will  
20 be right here in our area. We're excited about it and  
21 appreciate the so many that have been involved in this  
22 process. Thank you.

23 MR. McKOY: The next commenter on the list is  
24 Ivan Jackson, Jr., with Ducks Unlimited, and he's a rancher.

25 MR. JACKSON: First of all I'd like to say I am

1 very excited about -- about FutureGen coming here. Near zero  
2 emissions. As a rancher myself, we have a very -- a rather  
3 large ranch in northern Limestone County and also as the area  
4 chairman for Ducks Unlimited, Mexia Ducks Unlimited. We're  
5 also one of the largest conservation -- we are the largest  
6 conservation group in the world. Our chapter in Mexia is one  
7 of the largest in the nation, we're in the top 50 right now.  
8 There's over 13,000 chapters. We're very excited about the low  
9 emissions. I want to thank y'all for the thorough impact  
10 statement you've provided, and we're just very excited to go  
11 ahead with the project and look forward to y'all coming back to  
12 Limestone County real soon. Thank y'all.

13 MR. McKOY: The next commenter is Tom Wilkinson,  
14 Executive Director of the Brazos Valley Council of Governments.

15 MR. WILKERSON: Tom Wilkerson, Brazos Valley  
16 Council of Governments. Mark, thank you for you and your team  
17 and -- and all the contractors, we appreciate the great job  
18 that you have done.

19 All the COGs in Texas are designated by the  
20 governor to be the state-appointed contact for state level  
21 review and comments on projects like this. So if this were a  
22 state project we would have been charged with that process. So  
23 within the COG staff we have the ability to review documents,  
24 all 2,000 pages, for the purpose of commenting and -- and  
25 making sure that it's a benefit to our community. We thank you

1 for the opportunity to do that on this project and we support  
2 FutureGen coming to the Brazos Valley -- I mean The Heart of  
3 Brazos.

4                   The -- we gave everyone the opportunity to sign  
5 in today a document of support. Instead of having 400 people  
6 come and tell you how much they support, we listed -- gave them  
7 the opportunity to sign. So I would like to read this and  
8 there is 70 plus signatures on this that will then be turned in  
9 as a part of the official record.

10                   As a unified voice The Heart of the Brazos  
11 residents would like to express our support for the FutureGen  
12 Project and The Heart of the Brazos proposal. This comment is  
13 being submitted by Tom Wilkerson, the Brazos Valley Council  
14 Government, Post Office Drawer 4128, Bryan, Texas, 77805. By  
15 signing this document of support we are expressing our support  
16 through one submitted comment. We believe that selecting The  
17 Heart of the Brazos site will continue to benefit the project  
18 through the years due to the location, resources, industrial  
19 support and experienced workforce. FutureGen is welcome to our  
20 region. Thank you very much.

21                   MR. McKOY: The next commenter is Kevin  
22 Benedict, Freestone County Economic Developer.

23                   MR. BENEDICT: My name is Kevin Benedict. I'm  
24 an independent businessman from Freestone County. I also  
25 represent Freestone County in all of its economic development

1 endeavors.

2 I too would like to thank the Department of  
3 Energy and all the subcontractors not only for providing such a  
4 voluminous document but doing it in record time. As you can  
5 see, we're all excited about the project. We're excited about  
6 the possibilities of -- of -- of FutureGen coming to Texas and  
7 to do it in record time and as thoroughly as it has been done  
8 is commendable and we appreciate your hard work in that  
9 regard. Thank you.

10 MR. McKOY: The next commenter is Lionel J.  
11 Milberger, Citizen.

12 MR. MILBERGER: Okay. Can you hear me? My name  
13 is Lionel Milberger. We currently live in Wimberly, Texas, and  
14 I want to thank you for allowing me to speak to you this  
15 evening.

16 First of all, I want to thank the Department of  
17 Energy. I want to thank the Department of Energy for your  
18 efforts in helping to provide affordable and clean energy to  
19 the ordinary citizen that lives on the land. You're to be  
20 complimented for that effort and I think our tax money is  
21 wisely spent therein. Now, but what I would like to do is to  
22 inform you of numerous already existing emission sources that  
23 exist in the area and -- and to express a few concerns that I  
24 have.

25 Now first of all, we own a home also in

1 Robertson County, an adjoining county, and in that county there  
2 are numerous emission sources that I hope you probably already  
3 have, but if you haven't I'd like you to reconsider the large  
4 number of emissions that are present in that county and there  
5 are probably similar ones present nearby also. But, for  
6 instance, there is eight or nine emu gas plants and numerous  
7 blackhole dehydration sites. There are hundreds of sour gas  
8 wells with treating equipment at the site including the  
9 scavengers. All of this submits to the air. Now I want to --  
10 I want to -- although I have concerns for a lot of those things  
11 other than air emissions, but the time is short, I only got  
12 five minutes so I'm going to restrict my comments to only the  
13 air emissions.

14                   There's many compression stations, phase  
15 separators, there are miles and miles of pipeline. There is  
16 two or three lignite coal fired power plants. Some already  
17 operational in that county, one recently just permitted. There  
18 are many injection wells. Injection wells I'd like to talk  
19 about because of the sequestration but time is not going to  
20 allow me to do that. Now, there are many heaters and blowers  
21 and hundreds of chicken houses.

22                   Now, all -- all of this equipment is emitting  
23 large emissions to the air and these emissions include acid gas  
24 and they include various other materials such as noxin and CoC,  
25 and I can appreciate and I do appreciate the fact that this

1 plant is said to be low in emissions, but when added to these  
2 already existing sources I want that to be considered.

3           Now, there are also V-tech emissions emitted at  
4 these sites and on top of that there's huge quantities of  
5 carbon dioxide. Now carbon dioxide's a big issue, it's a big  
6 issue with this plant, and there are some proper things that  
7 are being talked about to handle that carbon dioxide, but  
8 carbon dioxide is being already emitted in huge quantities in  
9 Robertson County from the gas treatment sites. About 5 to some  
10 15 percent of that natural gas is carbon dioxide. All of that  
11 is removed and spewed to the air.

12           Now, and in that county there are -- there's --  
13 there's a desire in that county for emission sources and there  
14 probably will be new and more to come as this project is done  
15 if it's done here.

16           Now, now I want to talk a little bit about what  
17 we have here in Texas because air emissions in my mind is a big  
18 deal partly because of the sources that I've already mentioned  
19 and yours will add to it somewhat. The T.C.E.Q. does not  
20 control emissions from oil and gas well sites. I'm glad to  
21 know there's a Railroad Commission member here. Now, T.C.E.  
22 does not control the following types of pollution. They don't  
23 control visual pollution, noise pollution, light pollution and  
24 increased traffic. Now, the T.C.E.Q. also has some  
25 shortcomings. For instance, I want to point out to the

1 audience, that the single most important gas in the atmosphere  
2 for humans to be viable, of course, is oxygen. Now the  
3 T.C.E.Q. does not regulate, control, or maintain the quantity  
4 of oxygen in the air. Now furthermore, T.C.E. does not control  
5 emissions to the air of other materials, specifically included  
6 is methane,  $CH_4$ . Also included is ethane, hydrogen, nitrogen,  
7 water vapors. Water vapors don't sound very bad, don't have  
8 time to talk about it today but it's important. And on top of  
9 that it's not even mentioned as far as controlling the carbon  
10 dioxide, this is T.C.E.Q.. Now, it's believed, hopefully from  
11 sources that emit large quantities of carbon dioxide, since it  
12 is heavier than air by about 1.5 times, one-and-a-half times,  
13 it can quickly move to the ground and reduce the oxygen content  
14 in the air for local residents.

15                   Now, the Railroad Commission, the Railroad  
16 Commission, also in Texas, a very important agency, but it does  
17 not limit, prohibit, or control the emissions to the air of any  
18 material except for material that has a commercial value, and  
19 the operators determine whether it has a commercial value. So  
20 so far as air emissions are concerned, from here again Texas, I  
21 want to point out that I think we're somewhat lacking and you  
22 should take that into consideration and I would urge you to do  
23 that.

24                   So if during planning, drilling, operating and  
25 maintaining this facility you come to me and say it is in full

1 compliance with all T.C.E.Q. and the Railroad Commission rules  
2 and requirements, I will not be impressed. I want to thank you  
3 for the opportunity to make this statement and if you have any  
4 questions I'll be happy to try to answer them, and I thank you  
5 very much.

6 MR. MCKOY: Thank you. We definitely do need to  
7 consider all sources of air emissions and it is something that  
8 I think we can look into much further. The next commenter is  
9 Gary J. Mech -- Mechler, NRG-Texas.

10 MR. MECHLER: Thank you. I'm Gary Mechler. I'm  
11 the general manager of Limestone Power Plant. I'd just like to  
12 comment that our existing plant through the permitting, the  
13 construction, the operation of the plant over the last many  
14 years, over twenty years, that the local community here has  
15 been extremely supportive of our plant, our employees, and I'd  
16 like to thank you for that. It's been a -- I've been here at  
17 the plant for two years and I've just been very impressed with  
18 the -- with the support of the community for our plant.

19 As you know, NRG is going to offer to donate 400  
20 acres of reclaimed mine property for the plant. It's an area  
21 where the lignite's already been mined, it's reclaimed. You've  
22 seen the pictures on the video, it's a beautiful site. We look  
23 forward to the plant coming there. We've also offered to -- to  
24 help the Alliance. We've been working with the Alliance to  
25 provide various services that can help, that can help the

1 FutureGen site come to this area, and we look forward to that.

2 As he earlier said, we'd like to thank the DOE,  
3 the contractors for the preparation of the Environmental Impact  
4 Statement. We think it's thorough, we think it's accurate, and  
5 we just look forward to the -- to the FutureGen site coming  
6 here to Jewett. Thank you very much.

7 MR. McKOY: According to my list all of the  
8 registered commenters have now had a chance to speak. If you  
9 registered and I failed to call your name, please let me know  
10 now. Okay. We can now hear from unregistered commenters. Are  
11 there any other comments?

12 Okay. I know that earlier this evening in  
13 talking with some of the people, it -- or two or three people  
14 actually brought up the issue of the handling of the mercury.  
15 Of course the proposed power plant would have an activated  
16 charcoal filter to help scrub out the mercury, but these  
17 gentlemen were wanting to know what would happen with the  
18 mercury once it's been captured. So that's an issue we  
19 probably need to look at a little further. There will need to  
20 be more planning, more design work before we can go further  
21 with it, but I thought it was a great question to ask. It was  
22 very appropriate, it's one that needs to be answered, and we  
23 definitely want to take a look further at that one.

24 Are there other concerns that should be heard?

25 Okay. Are there people who would like to provide statements of

1 support? Not that I wouldn't be delighted to end things early,  
2 but we'd love to hear from you. Please come up. It's -- state  
3 your name for the record please.

4 MR. HILL: I'm Roy Hill. I'm the mayor of  
5 Fairfield, Texas, and we support the FutureGen Project. I -- I  
6 know I'm joined by our County Judge, Linda Grant who's sitting  
7 out there and I'm looking at her and she's nodding yes so  
8 that's a good thing. We support you. We think you're doing a  
9 wonderful thing. We want to see affordable and reliable power  
10 in Texas and we want to see a cleaner environment. We applaud  
11 you guys in what y'all are attempting to do. You have our full  
12 support and the only other thing is that we want Jewett to get  
13 the site.

14 MR. McKOY: Do we have anyone else who would  
15 like to provide a comment? Please state your name for the  
16 record.

17 MR. KIRGAN:: I am William P. Kirgan, Limestone  
18 Commissioner, Precinct 2. I want to say to FutureGen on behalf  
19 of my County Judge, Daniel Burkeen, we welcome you, FutureGen.  
20 And I'm that noisy guy that asked him that question about the  
21 mercury and he highly satisfied my answer -- my question.  
22 Thank you.

23 MR. McKOY: Do we have anyone else who would  
24 like to provide comment? Come on up and please state your name  
25 for the record.

1 MS. GRANT: My name is Linda Grant and I'm the  
2 Freestone County Judge. Our county is very excited about this  
3 project. We're excited about the technology. We know that our  
4 area has the resources, that we're going to have some type of  
5 energy generation in this area, and we believe that this  
6 technology will help us in the future to have the cleanest  
7 technology that we can in place. So we welcome you and look  
8 forward to having this project come to our area. Thank you.

9 MR. MCKOY: Would anybody else like to provide  
10 comment? You know, sometimes when everyone comes up and speaks  
11 in favor of a project it's difficult for someone to come up and  
12 bring to our attention some concern or objection to the  
13 project, but this group has been a tremendously warm and  
14 welcoming group. I know that y'all would be, you know, happy  
15 to make sure that everyone has their comments heard and  
16 addressed. Would anyone else like to come up and provide  
17 comments? Okay, come on up. Again, please state your name for  
18 the record.

19 MS. BRENNER: I'm Juanita Brenner. I actually  
20 hail from Houston County, but I do have service area of  
21 thirteen counties in the general area of home health, and I  
22 have Assisted Living in Mexia, Texas, so I'm speaking on behalf  
23 of Mexia, Texas, at this time. I think FutureGen is a  
24 wonderful thing that will help service the energy needs of our  
25 state and also that if it will reduce emissions from the coal I

1 think that is a wonderful thing. I'm thinking about all the  
2 people that have C.O.P.D., congestive heart failure, and a lot  
3 of other things that happen to people. So I'm here on behalf  
4 of the medical community because if this will help all these  
5 people live a better life, I think that we should be for it,  
6 and thank you FutureGen and the DOE.

7 MR. McKOY: Do we have anyone else who would  
8 like to provide comment? You know, as we've addressed, or at  
9 least considered all of the potential environmental impact at  
10 the four sites there was nothing that really ruled any site  
11 out. All of the sites really are excellent sites, but there  
12 was one thing there that we didn't address in the E.I.S. but I  
13 certainly noticed as I visited all four sites last August, and  
14 this site was the winner, the site that had the warmest  
15 reception. Y'all were fantastic. And if we had to pick a site  
16 based on the best food, you certainly won by a long shot. Is  
17 there anyone else who would like to provide comment? Is there  
18 anyone else who would like to provide a statement of support?

19 MS. ABERNATHY: I would.

20 MR. McKOY: Please state your name for the  
21 record.

22 MS. ABERNATHY: I'm Jan Abernathy. I live in  
23 Limestone County, I own a business in Leon County, a  
24 construction services company, a lot of you know me, and I  
25 think we're really looking forward to this. I employ a lot of

1 people in the area and everyone I know is for it and we're  
2 really excited. Thank y'all for coming.

3 MR. McKOY: Is there anyone else who would like  
4 to provide comment? Please state your name for the record.

5 MS. RYDER: My name is Diane Ryder. I think  
6 many of you know that I wear many hats in the area. I am  
7 chairman of our Brazos Valley Seven County Regional Workforce  
8 Development Board, and I would just like to say that over the  
9 past year we have already been working to put in place programs  
10 to train the work staff that this plant will require in the  
11 construction phase as well as in the developmental phases of  
12 it, and I just wanted you to know that the whole seven counties  
13 that I represent are very much in favor of this project and  
14 we're looking forward to it coming to our location.

15 MR. McKOY: Is there anyone else who would like  
16 to provide comment. Okay. Thank you for your comments and  
17 participation. Remember that you may submit comments until  
18 July 16th of this year.

19 This concludes the public hearing for the  
20 FutureGen Project. Let the record show that the hearing  
21 adjourned at 8:08 p.m. Thank you.

22 (Hearing adjourns at 8:08 p.m.)

23

24

25

1 THE STATE OF TEXAS)

2 COUNTY OF LEON)

3 I, HELEN C. WOOTEN, Court Reporter in and for  
4 the State of Texas, do hereby certify that the above and  
5 foregoing contains a true and correct transcription of the  
6 requested portion of the Draft Environmental Impact Statement  
7 Hearing held in Buffalo, Leon County, Texas, on June 21, 2007.

8 WITNESS MY HAND this the \_\_\_\_ day of  
9 \_\_\_\_\_ 2007.

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HELEN C. WOOTEN, Texas CSR #5447  
Expiration Date 12-31-07  
3827 Travis Street  
Dallas, Texas 75204  
214.747.8007  
(214) 747-8087 (Fax)

1 **Errata for the Transcript of**  
2 **the U.S. Department of Energy**  
3 **FutureGen Public Hearing**

4  
5 **June 19, 2007**  
6 **Center for Energy and Economic Diversification**  
7 **Midland, Texas**  
8

9 Acronyms Used

10 CD – Compact disc  
11 CEED – Center for Energy and Economic Diversification  
12 CEO – Chief Executive Officer  
13 DOE – U.S. Department of Energy  
14 EIS – Environmental Impact Statement  
15 EOR – Enhanced oil recovery  
16 GE – General Electric  
17 ICDR – Initial Concept Design Report  
18 IGCC – Integrated Gasification Combined Cycle  
19 NEPA – National Environmental Policy Act  
20 NETL – National Energy Technology Laboratory  
21 R&D – Research and development  
22

23 Page 3

24 Line 7 – Change “CD’s” to “CDs”

25 Page 6

26 Line 21 – Change “Spurger” to “Berger”

27 Page 7

28 Line 5 – Change “Potomac Hudson Tetra Tech and” to “Potomac Hudson, Tetra Tech,  
29 and”

30 Line 6 – Change “Spurger” to “Berger”

31 Page 12

32 Line 7 – Change “emission” to “emissions”

33 Page 15

34 Line 18 – Change “Patel” to “Battelle”

35 Line 24 – Change “R & D” to “R&D”

36 Page 17

37 Line 7 – Change “They” to “The”

38 Line 7 – Change “Patel” to “Battelle”

39 Page 22

40 Line 6 – Change “,” to “;”

41 Line 7 – Change 1<sup>st</sup> “,” to “;”

42 Line 8 – Change “,” to “;”

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FutureGen Public Hearing  
June 19, 2007  
CEED, Midland, Texas  
7:00 p.m.

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MR. McKOY: Welcome to the Department of Energy's public hearing for the FutureGen project. Let the record show that the hearing began on June 19th, 2007, at 7:00 p.m. at the Center for Energy and Economic Diversification in Midland, Texas. As part of its compliance with the National Environmental Policy Act, the DOE has produced a Draft EIS or EIS for this project. The document analyzes the potential environmental impact at the alternative sites for the proposed project. Both the document and the comments received should help DOE in making better-informed decisions.

The Draft EIS has been distributed to persons who have previously expressed an interest in the project. If you previously requested a copy of the document and you did not receive it, please provide your mailing address to Rachel Spangenberg. Rachel, would you stand up? She's located back there. So please find her, provide to her either your address and tell her what type of document that you want or at least a form you want the document in.

Also, there are comment cards available that can be used to request a copy of the Draft EIS as well as the Final EIS. These cards are located at the DOE exhibits. The document is available in three forms.

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You can receive the document in electronic form, on a CD, or you can get a hard copy of the summary plus a CD of the entire document, or you can get a hard copy of the entire document.

5                   We do have with us tonight a limited  
6 number of hard copies of the summary, and we have some  
7 CD's for the entire document. After the Draft EIS is  
8 distributed to the public, a public hearing is held to  
9 get -- help gather comments on the document and on the  
10 proposed Federal action.

11                   During the informal session earlier this  
12 evening between 4:00 and 7:00 p.m., DOE and its support  
13 contractors, as well as representatives of the FutureGen  
14 Alliance and the local site proponents, the FutureGen  
15 Texas Odessa team were available to listen to your  
16 concerns and to attempt to answer your questions. We  
17 hope this session was as informative for you as it was  
18 for us.

19                   During the formal session tonight, we will  
20 briefly present the role of DOE, and we will go over the  
21 relevant parts of NEPA compliance and the remaining  
22 schedule, and the FutureGen Alliance will briefly  
23 present an overview of the FutureGen project. Then we  
24 will begin the formal comment session.

25                   As with the scoping meetings held in

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1 August, we will give priority to elected officials and  
2 their designated representatives to go first. However,  
3 DOE realized that during the scoping meetings, the  
4 general public had to wait a long time before having an  
5 opportunity to speak. This time, with the assistance  
6 and cooperation of elected officials, we hope to give  
7 the general public an opportunity to speak sooner this  
8 evening. We hope that all of you can stay for the  
9 entire oral comment session.

10                   For those who cannot stay and for those  
11 like me who don't feel comfortable speaking in front of  
12 a large audience, we do have a separate comment station  
13 that's located across the lobby area on the other side.  
14 There will be a DOE person there to listen to your  
15 comment and a court reporter to make a transcript.  
16 However, we do prefer that you use the formal session  
17 here to provide oral comments.

18                   Written comments are given equal weight  
19 with oral comments, and written comments tend to be  
20 crafted more carefully and can be written at your  
21 convenience. You may provide written comments instead  
22 of or in addition to oral comments. Again, there are  
23 comment cards available at the DOE exhibits. You fill  
24 out the cards and submit them tonight or any time before  
25 the close of the comment period on July 16th. You can

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1 also provide comments by e-mail, by regular mail -- have  
2 those postmarked by July 16th -- by faxes, by voice mail  
3 and telephone calls, as indicated on the literature  
4 available at the DOE exhibits.

5                   On tonight's agenda, we will have a  
6 presentation of DOE's role in the project. That  
7 presentation will be provided by Tom Sarkus with the  
8 Department of Energy NETL Pittsburgh office. We will be  
9 given an overview of the project by Jerry Oliver, with

10 the FutureGen Alliance, and I will provide an overview  
11 of the relevant NEPA compliance issues at this point in  
12 the process. And after that, we hope to get comments  
13 from you, the public.

14 Visiting with us tonight we have Michael  
15 Williams from the Railroad Commission. He is the  
16 Railroad Commissioner. Michael, would you please stand?

17 (Applause)

18 MR. McKOY: We have Ricky Wright,  
19 representing Congressman Michael Conaway.

20 (Applause)

21 MR. McKOY: Denise Perkins, representing  
22 State Senator Seliger.

23 (Applause)

24 MR. McKOY: We have Royce Bodiford,  
25 representing Odessa City Council District 3 and Mayor of

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1 the City of Odessa. And we have Mike George, president  
2 of the Odessa Chamber of Commerce.

3 (Applause)

4 MR. McKOY: Representing DOE, we have Tom  
5 Sarkus, again, from the DOE office in Pittsburgh. Tom  
6 is up here.

7 (Applause)

8 MR. McKOY: Tom is the project director  
9 for FutureGen. He is with the office of Coal Power R&D.  
10 We have Otis Mills, who is our media relations expert  
11 seated right here. We have Jeff Hoffman with DOE in  
12 Pittsburgh. Jeff is a systems engineer with the  
13 project. We have Bill Gwilliam, who is a geologist with  
14 DOE recently assigned to help us with the project. And  
15 of course we have me, Mark McKoy, with DOE from the  
16 Morgantown office. I am the environmental manager in  
17 DOE, NEPA document manager for FutureGen.

18 (Applause)

19 MR. McKOY: The Draft EIS was prepared by  
20 a team representing Potomac Hudson Engineering, Tetra  
21 Tech, and Lewis Spurger. We have with us tonight Fred  
22 Kerry, the president of PHE, Potomac Hudson Engineering.

23 (Applause)

24 MR. McKOY: And the person who has been  
25 responsible for actually putting the document together

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1 and getting it all published and ready for us to read  
2 and review is Debra Walker. Debra, would you --

3 (Applause)

4 MR. McKOY: And I would like for all of  
5 the other members of the Potomac Hudson Tetra Tech and  
6 Lewis Spurger team that has worked so hard on the  
7 document to stand for just a moment.

8 (Applause)

9 MR. McKOY: Now, it's time for a few  
10 presentations to provide you with some background  
11 information regarding the project. Here is Tom Sarkus  
12 with DOE on the DOE role in the project.

13 MR. SARKUS: Good evening, and thank you  
14 for coming. This is a nighttime photo of Tampa

15 Electric's integrated gasification combined cycle. We  
16 use the acronym IGCC a lot. And that is one of two  
17 coal-based IGCC plants that are currently operating in  
18 the United States. It's also the top dispatch or the  
19 number one unit, if you will, in Tampa Electric's  
20 generating system, and it's been operating commercially  
21 for over ten years. Now, with operating plants --  
22 operating IGCC plants having designs that are, in most  
23 cases, over ten years old, it's time to build upon the  
24 lessons we learned on those units and to bring about the  
25 next generation of coal-based electric generating

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1 technologies.

2 When Tampa and the other IGCC unit at  
3 Wabash River were designed in the early 1990's, key  
4 external drivers were sulfur and nitrogen oxide  
5 emissions relevant, at that time, to acid rain controls.  
6 We also had to focus on the technical challenge of  
7 combining and effectively integrating a gas fire with a  
8 combined cycle. These are plants that have many pieces.  
9 And while no one of those pieces is necessarily  
10 difficult to build or operate, when you add them all  
11 together, you have a challenge in terms of integrating  
12 them so that they all work together well.

13 Today, we have additional drivers such as  
14 mercury and CO<sub>2</sub>, and the latter is relevant to climate  
15 change. These drivers are going to require us to add  
16 even additional pieces or processes into the coal-based  
17 power plants of tomorrow. You probably have heard about  
18 FutureGen mostly in a context of a technology-based  
19 mitigation strategy for addressing climate change. That  
20 is, FutureGen will produce and separate hydrogen and  
21 carbon dioxide using the hydrogen to produce electric  
22 power and storing, we use the term -- the technical word  
23 "sequestering" but it really means storing the CO<sub>2</sub> in  
24 deep saline aquifers. This slide pairs major CO<sub>2</sub>  
25 sources with major CO<sub>2</sub> storage reservoirs in North

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1 America. I'm often asked how much CO<sub>2</sub> can these  
2 formations hold?

3 Well, assuming that we produced 3.8  
4 gigatons of CO<sub>2</sub> annually, we have 3,800 gigatons of  
5 storage capacity as shown on this slide. That would be  
6 about a thousand years of CO<sub>2</sub> production at current  
7 rates. That should be more than enough CO<sub>2</sub> storage  
8 capacity, given that the United States has a 250-year  
9 supply of coal.

10 FutureGen is currently estimated to cost  
11 \$1.757 billion and that includes approximately \$1.5  
12 billion to design and build the plant and the geologic  
13 storage facilities, plus another \$300 million to operate  
14 those facilities for a three-year period. We also  
15 estimate that during that three-year period, FutureGen  
16 will generate about \$300 million in electricity sales or  
17 revenues, which will be used largely to offset the costs  
18 of operation.

19 FutureGen is being implemented through a

20 cooperative agreement with the DOE and the FutureGen  
21 Industrial Alliance. The Alliance consists currently of  
22 12 coal mining and coal-based electric power companies.  
23 Their corporate logos are shown here.

24 The cooperative agreement is structured  
25 around six budget periods, which are shown on this

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1 schedule. We recently transitioned from what we call  
2 budget period zero, which is project structuring and  
3 conceptual design, into budget period one, preliminary  
4 design. And that's where the project stands right now.

5 Over the past year, a lot of work is  
6 centered on site selection and on conceptual design of  
7 both the power plant and the sequestration or the  
8 storage field. Over the next year, some focus is going  
9 to shift towards selecting technology or equipment  
10 suppliers for major parts of the project.

11 Design will continue into the Spring of  
12 2009 and construction will run through 2011, followed by  
13 a period of shake-down and start-up. We expect to begin  
14 commercial operations of the first FutureGen plant by  
15 the end of 2012. DOE and the FutureGen Alliance are  
16 splitting the project costs, 74 percent by DOE and  
17 26 percent by the Alliance. As for international  
18 participation, foreign companies may join the Alliance  
19 as equal members, while foreign government contributions  
20 are counted on the DOE or the government side of the  
21 project ledger. We hope to secure at least \$80 million  
22 from foreign governments at a rate of \$10 million each.  
23 And so far, four countries have announced an intention  
24 to join, and those being India, South Korea, China, and  
25 Japan. We're working on developing an international

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1 agreement to facilitate that.

2 So here is the summary of the project  
3 costs. Again, you will hear different numbers. The  
4 plant is going to cost \$1.5 billion to design and build,  
5 a little bit more to operate it for an operating period.

6 That ends my summary presentation. Here  
7 is my contact information. Again, thank you for coming.  
8 Mark?

9 MR. MCKOY: Thanks, Tom. The next  
10 presentation is by Jerry Oliver. He's vice president of  
11 the FutureGen Alliance, and Jerry will give us an  
12 overview of the project.

13 MR. OLIVER: Thank you, very much. Let me  
14 make sure I use this thing right. Good evening, folks  
15 and I really appreciate the opportunity to be here. I  
16 will try not to duplicate anything that Tom has said,  
17 but I do have some similar slides. I was here last  
18 August and you will see some of the same material, but I  
19 will update it.

20 And you know, it's been nine months. It  
21 feels like it's been more like a few weeks, but it's  
22 amazing how fast time goes by. And we have accomplished  
23 a lot but when I say we, it really means the FutureGen  
24 Texas group. It means the Odessa team. It means the

25 Department of Energy, and it means the Alliance, the  
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1 Alliance partners. Without everybody working together,  
2 we would not both be here tonight and we clearly would  
3 not have done all the work that's been done to this  
4 point.

5           Let's see. Here we go. What I will do is  
6 give you a quick background on the project. It is  
7 intended to be the world's first near zero emission coal  
8 fueled power plant. We will capture 90 percent of the  
9 carbon -- of the CO2 we produce, and then we will put  
10 about a million tons of that underground. We should  
11 produce more. We will produce more, but we will put a  
12 million tons underground out of that into a deep saline  
13 geologic formation, and I will talk about that a little  
14 more.

15           What we are going to -- the project itself  
16 is really our research platform and a living laboratory,  
17 a place to really take a commercial scale and test  
18 technology that actually will make coal more  
19 environmentally benign and, we believe, commercially  
20 valuable. And it is a global, public, and private  
21 partnership, and I will go into that in more depth. And  
22 we weren't going to do this without everybody's  
23 involvement, because this project is truly building a  
24 first-of-a-kind very unique and complex plant that will  
25 be used around the globe if we do it right, but that

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1 means we really have to involve the community in that.

2           We have some very clear objectives in the  
3 project. We are designing, we will build and operate  
4 the near zero emissions plant. We are going to capture  
5 and sequester more than a million tons a year of CO2.  
6 We are going to have very low levels of NOx and SOx and  
7 particulate matter and mercury, and will be online in  
8 2012. We are also going to move technology forward  
9 beyond that point as far as you can, because the cleaner  
10 you can get coal, the more commercially viable what you  
11 are doing is, the more it will be used around the globe.  
12 And that really means we need to get very broad  
13 involvement. So we're not doing this in any way to keep  
14 technology. The Alliance is actually technology, as we  
15 go forward, that will be used by the globe.

16           Why do we need this? It's a unique  
17 opportunity to provide carbon sequestration in deep  
18 formations. It gives us an ability to really, at a  
19 large scale, understand the technical and the economic  
20 implications of putting CO2 underground. EOR to me is  
21 putting it underground, but it's a very small sliver of  
22 the amount of CO2 that's available in the world to go  
23 underground. So the need is to prove that you can  
24 actually store it for long-term and understand the  
25 implications of that. We also will use the project to

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1 build both a legal and a regulatory framework to allow  
2 what we are doing to be used both in the US and  
3 globally. It gives us a real unique opportunity to

4 advance IGCC technology. We are not building a  
5 commercial plant, building a research platform. We are  
6 actually able to allow the vendors and the builders of  
7 technology to push their technology without worrying  
8 about the performance guarantees that they normally  
9 face. It gives us the chance to take ideas that the DOE  
10 has been testing for years and actually bring them  
11 forward into an integrated facility.

12 There isn't a single IGCC plant out there  
13 right now that actually combines with carbon capture  
14 sequestration. This project will do that. We are  
15 actually leading any other activity in this regard, and  
16 I think one of the reasons is it's pretty hard to come  
17 up with a way to finance a project like this without  
18 actually proving it once. So what we're doing will  
19 actually put in the world a way to understand both the  
20 science behind it and also something that others can  
21 understand the risks with.

22 And by having the international  
23 participation we do, the project will have the ability  
24 to move around the globe. One of the things that was  
25 discussed in the interview this afternoon was will

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1 countries like China accept this? Well, first of all,  
2 China is a partner in this. And I do believe that  
3 everybody understands the implications of having bad  
4 air. And if you can do things about it, which this  
5 project will help do, then in fact, it will be used  
6 around the globe.

7 Not to belabor what Tom did, we have 12  
8 companies that are involved in FutureGen. It is a  
9 nonprofit 501(c)(3) so all the companies donate to the  
10 Alliance. There is no -- they get nothing out of it,  
11 other than moving technology and having an opportunity  
12 to learn as we go forward. The same for the DOE. The  
13 United States is involved through the Department of  
14 Energy. And as Tom said, we are actually -- they are  
15 actually looking at adding other countries to their  
16 group of folks involved in this.

17 We have some great partners. And we have  
18 Patel, who is leading subsurface work and who is  
19 actually here with quite a number of people here  
20 tonight. They also are our general management  
21 contractor and they're involved with dealing with the  
22 DOE and the public and the rest so that they provide an  
23 awful lot of support to this project, and they're one of  
24 the leading R & D organizations in the United States.

25 We have engaged, in every aspect of this,

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1 world class experts and will continue to do that.  
2 Because when you're trying to push technology, you  
3 really need to get the best ideas that exist, both not  
4 only in the US, but in the globe and we are doing that.

5 And lastly, we have brought on the  
6 Washington Group as our engineering and design  
7 contractor, and they have started to take all the work  
8 that we have done in the past and bring that forward,

9 which I will talk about in a minute on the surface  
10 plant.

11 The project will be designed (inaudible)  
12 and will also be set up to run test quantities of  
13 lignite and other things that others would like to bring  
14 in from other parts of the globe or other types of coal.  
15 We are going to push gasification technology. We are  
16 going to push the hydrogen turbine. I mean, one of the  
17 things that makes this project unique is we really are  
18 going to run on hydrogen with the nitrogen deluuant, but  
19 straight hydrogen, and there is a lot of other aspects  
20 to make this thing work the way that we are talking  
21 about that deals with gas handling and material handling  
22 that we will push. So every aspect of this project will  
23 be pushed as we go forward.

24 We are going to integrate CO2 capture at a  
25 scale that will be commercially relevant. And we are

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1 going to create an ability to take slip streams off the  
2 plant to actually continue to develop science out of the  
3 facilities as it goes forward.

4 I don't want to add a lot of what Tom  
5 already said about sequestration except to point out  
6 that we are doing some really front-end forward-thinking  
7 work on modeling. They work that Patel is doing on  
8 leading on modeling underground along with what's been  
9 done by BEG and others is truly advancing the science of  
10 what's going to happen and getting us better prepared  
11 for the phase of actually putting CO2 underground.

12 And to add to Tom's comment, he said there  
13 is around 3,800 gigatons of storage in the United  
14 States. Following that same thing, there is 11,000  
15 gigatons of storage around the globe. So there is  
16 plenty of room to put all the CO2 for the next thousand  
17 years around the globe, if we can actually prove that  
18 what we are doing makes sense.

19 What have we done since we last saw y'all?  
20 We finished a very broad evaluation of a lot of  
21 different ways to build a facility that can do this and  
22 came up with a lot of alternative power plant designs,  
23 integrated with CO2 sequestration, and costed those out.  
24 We came down to three that went into the documents that  
25 have recently been published by the ICDR and are partly

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1 the basis of the EIS.

2 We made sure that what we did was fuel  
3 flexible. And then we brought on Washington Group to  
4 actually take what we have done in the last year and  
5 bring it down to a single plant design. And right now,  
6 we are going out into the marketplace just to find  
7 people to do the gasification part of the plant, the gas  
8 turbine and the rest. So we're actually moving now to  
9 the next step to actually build the facility.

10 I won't -- Tom already covered the cost  
11 structure. The \$1.5 billion is essentially the same  
12 number he had, without taking into account the coal that  
13 will be used during the plant's life and that is

14 essentially the same schedule. It does take into  
15 account some overlap in phases, but the key to the  
16 schedule is that in 2009, we will break ground and in  
17 2012, we will start the plant. So that hasn't changed  
18 since we were together in August and essentially, the  
19 project is on track in that regard.

20 What are we doing now? We are finishing  
21 preliminary design work, both surface and subsurface.  
22 We are doing due diligence on the technologies that  
23 could possibly fit into this and starting to work with  
24 the potential vendors and equipment system providers in  
25 that regard. We are developing specifications that fit

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1 to while to build an integrated facility that meet the  
2 goals that you saw at the front. We are finishing a  
3 fairly extensive due diligence effort that a lot of you  
4 have been involved in over the last year. And over the  
5 next few months, we will finalize offers on the four  
6 sites, and we are supporting DOE's efforts in the EIS in  
7 both this public hearing and in all aspects of the EIS  
8 efforts.

9 On Friday last week, we put out our  
10 guidance for the best and final offers. We're asking  
11 the sites to get that back to us by August 1st.  
12 Assuming that we get the Record of Decision on the four  
13 sites at the end of October as currently planned, we  
14 will announce the site in November. So that's currently  
15 the schedule for what we're doing. And I think that's  
16 the last slide.

17 So to get to the point we're at, we  
18 couldn't have done it without all the support we've had,  
19 and the project is moving forward, again fast and it's  
20 essentially on track, and I'm really glad to be back  
21 here and get a chance to talk to y'all. Thank you.

22 MR. McKOY: Thanks, Jerry, for that  
23 update. As Jerry indicated, they are now moving,  
24 transitioning from the conceptual design phase to the  
25 preliminary design phase, and of course that is all work

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1 that they can undertake before we complete the NEPA  
2 process. I know I gave all of you an overview of the  
3 NEPA process if you attended the scoping meetings, but I  
4 realize there may be some people who did not attend  
5 those meets, so I will go over a few of the key points  
6 again.

7 NEPA stands for the National Environmental  
8 Policy Act. It is a Federal law. It became effective  
9 January 1st, 1970, and it applies to all Federal  
10 agencies. It does not apply to state agencies or local  
11 government agencies. It does not apply to the private  
12 sector, only to Federal agencies. It has often been  
13 called the national charter for protection of the  
14 environment, because it is the first leg that broadly  
15 addresses protection of the environment.

16 What it requires is that there be  
17 consideration for environmental impact in Federal  
18 decision-making. The NEPA mandate is that environmental

19 information must be available to public officials and  
20 citizens before Federal decisions are made and before  
21 Federal actions are taken. The document must contain  
22 high-quality information. It should be based on  
23 scientific analyses. The analyses should be accurate,  
24 and there is a requirement that Federal agencies, at  
25 least, having expertise, would review the document and

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1 provide comment. We are also required to put the  
2 document out to other governmental agencies, state  
3 agencies, local agencies, and give them an opportunity  
4 to comment on the document.

5 And of course, most importantly, we're  
6 required to put the document out to the public so that  
7 you can review it and provide your comment and your  
8 input into the process. And that's why we're here at  
9 this public hearing tonight. We are very interested in  
10 getting your comments to learn about your concerns,  
11 particularly if you are a person or an organization who  
12 is affected or has a particular special interest in the  
13 project.

14 You can give comments on the adequacy of  
15 the EIS, on the merits of the alternatives, and on the  
16 proposed Federal action, particularly relative to the  
17 environmental impacts.

18 At this point, we are in the middle of the  
19 process. That is, we have prepared a draft document, we  
20 have now put that out for the public to review and  
21 comment on. We will take the comments that we receive  
22 and use those comments to prepare the Final EIS and then  
23 distribute the Final EIS to the public. No sooner than  
24 30 days after we distribute the document to the public,  
25 the Department of Energy can issue a Record of Decision.

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1 DOE has some particular responsibilities at the point in  
2 the process. They must consider public comments, both  
3 individually and collectively.

4 DOE must respond to public comments in the  
5 Final EIS in one of the following ways. We can modify  
6 the alternatives, evaluate alternatives not previously  
7 given serious consideration, we can supplement, improve,  
8 or modify the analyses, and we can make factual  
9 corrections. Otherwise, we must explain why comments do  
10 not warrant further agency response.

11 We will attach all the substantive  
12 comments to the Final EIS. Right now, as I said, we are  
13 halfway through the process, so we are at the public  
14 hearing stage, indicated there for June of '07. We  
15 would like to get the Final EIS out to the public in  
16 September of this year and that would allow us to get to  
17 a Record of Decision, hopefully, in October of this  
18 year.

19 DOE does, in fact, want your  
20 participation. We take very seriously our obligation to  
21 get your comments, to learn about your concerns  
22 regarding the project. Please send your comments to me,  
23 the NEPA document manager at mail stop N03, P. O. Box

24 880, Morgantown, West Virginia, 26507-0880. You can  
25 e-mail comments to me at FutureGen.eis@netl.doe.gov.

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1 And keep in mind the comment period closes July 16th,  
2 2007.

3 Okay. It's time to begin the formal  
4 comment period when the public is invited to provide  
5 oral comments with the adequacy of the EIS, the merits  
6 of the alternatives and the proposed Federal action.  
7 For those of you providing oral comments, we ask that  
8 you keep your comments to within a five-minute  
9 timeframe. This allows us to make sure everyone has  
10 equal opportunity to provide comments. You may speak a  
11 second time after everyone has a first chance to speak.

12 It is important to make your views known,  
13 either now in oral statements or in writing. Again, we  
14 do have a comment card that you can use. You can write  
15 your comments on the card, put your name and address on  
16 here, and you can indicate what form you would like the  
17 final EIS in, whether in hard copy or CD summary. If  
18 you would like a copy of the Draft EIS that we have just  
19 put out, just write that in up here and we will try to  
20 get that to you also.

21 You can fill these out. You can hand them  
22 in tonight. You can put a stamp on them and mail them  
23 to me later. Just have it postmarked before July 16th,  
24 please. We will consider late comments to the extent  
25 that we can. Again, you can send your comments in by

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1 any other means, by regular mail, write a conventional  
2 letter, write an e-mail. Any of those approaches will  
3 work. Just keep in mind the comment period officially  
4 closes July 16th.

5 Again, all comments will be considered  
6 equally, as we continue with the development up to the  
7 Final EIS. And just one more time to go over the rules  
8 for the oral comment session, five minutes per speaker,  
9 please. Two opportunities to speak, if time allows;  
10 that is, if you want to come up a second time, we will  
11 try to accommodate that. Government officials and  
12 pre-registered speakers go first.

13 And a transcript is being made. We have a  
14 transcriptionist so when you come up, state your name,  
15 maybe spell out your name for the transcriptionist, make  
16 sure that she can get that name down correctly. Or  
17 alternatively, you can use the comment cards, if you do  
18 not wish to speak in front of the audience.

19 Hopefully, someone can bring me the list  
20 of people who signed up. The first commentor that I  
21 have here is Scott LaGrone.

22 MR. SCOTT LaGRONE: My name is Scott  
23 LaGrone, and I have to say I was raised in the Permian  
24 Basin. I went through high school at Odessa High  
25 School. I spent the last 50 years in Austin, Texas.

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1 But I wanted to take this opportunity to talk about the  
2 FutureGen proposal from my perspective. I was not aware

3 of some of the information I heard tonight. I will make  
4 a comment on that in a moment.

5 I'm currently a member of -- Chairman  
6 Williams is chairman of our Clean Coal Technology  
7 Council. I was appointed by Governor Rick Perry in  
8 2004. I have served six years on the Lower Colorado  
9 River Authority Board of Directors and involved with  
10 3,000 megawatts of power generation during that time  
11 period, as well as coal generation. I do appreciate the  
12 chairman's efforts to promote the FutureGen proposal for  
13 the State of Texas.

14 I can't tell you how important it is that  
15 with find some alternative fuels besides natural gas for  
16 our state to use in the generation of electricity, and  
17 certainly, FutureGen is a real hopeful research area. I  
18 spent 35 years in the research area of energy  
19 environment, and so I started with some of the work in  
20 the (inaudible) process which then became the Texaco  
21 process, which is the now the GE process, which is  
22 what's now called integrated gasification combined  
23 cycle.

24 The NEPA process, which you heard so much  
25 about, requires not only the classical biological and

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1 physical examination, but it also requires examination  
2 of the human impacts on the population on the economy.  
3 And I think that these gentlemen are more than qualified  
4 to have looked into the biological and physics of the  
5 emissions, et cetera. But what I would like to comment  
6 on very quickly is the human and societal considerations  
7 for the Permian Basin. My belief is that the local and  
8 national economic factors are very important in this  
9 specific EIS, because of the nature of what it can  
10 achieve for our nation and for our state.

11 In summary, and you should know, I  
12 submitted a 10-page document that has more than you ever  
13 want to know about each of these points, so I will just  
14 give you the summary points and stick within my five  
15 minutes. I believe FutureGen is a perfect research tool  
16 for the West Texas location and will meet the societal  
17 and economic impact requirements of the NEPA act. I  
18 believe that this is because leaders in this region and  
19 the general population are energy aware and would  
20 welcome such a facility and the economic contribution it  
21 will bring.

22 The IGCC process is a chemical process.  
23 It's not a conventional coal operation. It requires the  
24 work force with the chemical plant experience where you  
25 need chemical plant experience to operate it, not

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1 (inaudible) coal experience. We're veterans in the  
2 Permian Basin where we have years and years of  
3 experience in personnel in operating the chemical and  
4 natural gas facilities. I think that is a very  
5 important point when you start evaluating this location  
6 against other locations in the country.

7 From my perspective, at least, having been

8 raised here, environmentally, it is an excellent  
9 location for such a facility with a history and  
10 acceptance by the population of the importance of energy  
11 production for our nation.

12 Another valuable point is rail by coal,  
13 especially western coal, is easily available and at a  
14 reasonable cost to this location. I understand you are  
15 going to use other coals as well in this research  
16 facility, but certainly, western coal is -- a line runs  
17 just north of here and provides all Central Texas coal  
18 plants with their western coal.

19 I heard the part about the deep saline  
20 injection, and I've just got to add, I sure hope one of  
21 the slip streams of the CO2 off of this facility is used  
22 to produce more oil for this nation. If there ever was  
23 a case where it's needed, we are currently importing it  
24 from the Four Corners area up in Farmington, New Mexico,  
25 via pipeline. And what better way than to take more

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1 than just a slip stream of this million tons a year, but  
2 let's inject it into our water-flooded oil fields and  
3 produce more oil for our nation.

4 Since IGCC plants are chemical plants,  
5 they work best when running at full load capacity or at  
6 least constant load, not when they try to fall the load  
7 like natural gas plants do. The electric we get in this  
8 area can more than accommodate the 275 megawatts this  
9 plant is going to be, so there is no question about  
10 operational feasibility of the plant. I'm sure all of  
11 this is well understood by the scientists and  
12 technologists who have been involved in this but I came  
13 into this kind of late, I must admit.

14 The Texas grid not only wants  
15 275 megawatts, we have a need for 20 or 30,000 megawatts  
16 of power in the next 20 years in this state and we are  
17 desperate. And so this technology needs to move as fast  
18 as it can so that we can get some real-sized plants,  
19 1,000 megawatts as opposed to 275 megawatts, and get  
20 them under way and sequester the CO2 at the same time.

21 I guess in summary, I just have to say  
22 that I believe this project here in the Permian Basin is  
23 a win-win for DOE and its research goals, promoting  
24 national energy independence through new coal  
25 technology. I believe it's a win-win for the Permian

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1 Basin economy with its trained work force and positive  
2 attitude about energy development. I think it's a  
3 win-win in helping Texas reach its current and future  
4 needs for electrical power, because we really are in  
5 need in the next ten years, and I think if we will take  
6 this slip stream of CO2 and put it down in the ground, I  
7 think it's a win-win in energy independence for more  
8 domestic crude production.

9 And again, thank you very much for your  
10 time and patience. I hope I stuck with my five minutes,  
11 and I will be happy to answer any questions, if it's  
12 appropriate.

13 MR. McKOY: The next speaker is Michael  
14 Williams, the Railroad Commissioner.

15 MR. MICHAEL WILLIAMS: Mark, thank you.  
16 Understanding the admonition to all of us elected  
17 officials to be short and recognizing the proverb that  
18 says, "Blessed is he with little to say and refrains  
19 from saying it," I will be short. I want to do a couple  
20 of things. First of all, to so I thank you, Jerry, to  
21 folks from the Alliance for the way that you worked with  
22 us and the way you have allowed us to make the best  
23 presentation that we could have.

24 And second, obviously, it's to DOE for the  
25 same and I want to do the same thing to Hoxie, to you

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1 and your group here locally for doing what you could on  
2 behalf of West Texas. It is a pleasure for me as a son  
3 of Midland and Odessa to have a chance to come back home  
4 and then to also welcome all of you here, from myself  
5 and from Governor Rick Perry for all the work that you  
6 have done.

7 And as it specifically relates, Mark, to  
8 the EIS, let me do this from the State of Texas. We  
9 appreciate the thoroughness, the accuracy of the work  
10 that you did, and we appreciate the fact that Gretchen,  
11 I think we left the scoping meeting and I said that I  
12 looked forward to you coming back to Texas in November,  
13 so let me leave this podium the way I left it the last  
14 time. I look forward to you coming back to Texas in  
15 November, because in Texas, in November, one of those  
16 two sites will be the site that you select. As I tell  
17 folks, right now because officially on behalf of both of  
18 them, I am a parent with two kids. I want both my kids  
19 to succeed and look forward to one of them succeeding.  
20 Thank you.

21 MR. McKOY: Thank you, Michael Williams.  
22 The next speaker is Ricky Wright, representing  
23 Congressman Michael Conaway.

24 MR. RICKY WRIGHT: I think it's a little  
25 unfair to make me follow a first-class act like Michael,

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1 not much I can add to that. But on behalf of  
2 Congressman Conaway, he regrets the fact he can't be  
3 here tonight. He sent a quick statement, basically to  
4 address the good folks from the DOE and welcome you to  
5 West Texas.

6 As it begins, "Welcome to Odessa, Texas,  
7 and the Permian Basin. I am disappointed I could not be  
8 here to join you today for this very important first  
9 step in making FutureGen a reality. I appreciate the  
10 opportunity you have given me to brag on the excellent  
11 efforts of the Odessa community and the efforts they  
12 have put in bringing FutureGen to the Permian Basin.

13 "The Permian Basin has long been a leader  
14 in energy production in research, both traditional and  
15 alternatives forms of energy. Generally known for oil  
16 and gas, the community has put together a tremendous  
17 effort in looking toward the future with the efforts to

18 bring FutureGen to West Texas. The statement of having  
19 a traditional oil and gas center push for an alternative  
20 energy source is a testament to the dedication of this  
21 community to improve our nation's energy security and  
22 lead us into an independent energy source.

23 "In regard to the environmental concerns  
24 of FutureGen, I am confident that the Penwell-Odessa  
25 site has the most positive impact on the environment.

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1 In addition to natural advantages of the remoteness of  
2 the site, FutureGen will receive support from the area's  
3 years of expertise in handling CO2 sequestering and  
4 enhanced oil recovery. This provides the infrastructure  
5 to continue such efforts and will also help in assuring  
6 that CO2 is always handled in an  
7 environmentally-sensitive manner.

8 In addition, the FutureGen committee and  
9 the supporting communities have addressed all the issues  
10 in relation to the EIS, including concerns regarding the  
11 availability of water to the site.

12 Again, thank you for your efforts in  
13 making the FutureGen a reality. I continue to believe  
14 that the Penwell-Odessa site is far the best site for  
15 energy production." No offense there, Michael.

16 "And I hope you will enjoy some of West  
17 Texas' fine hospitality during your stay and please call  
18 on me or my office if there is anything or any  
19 assistance I can be. Sincerely, Michael Conaway, US  
20 Congressman." Thank you.

21 MR. McKOY: We have certainly been  
22 enjoying the West Texas hospitality.

23 MR. RICKY WRIGHT: We've got some more.

24 MR. McKOY: The next commentor is Denise  
25 Perkins representing State Senator Seliger.

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1 MS. DENISE PERKINS: I'm Denise Perkins,  
2 and I'm with Senator Seliger's office and he could not  
3 be here tonight, but he sends this comment. He says,  
4 "Texas is completely committed to the FutureGen project.  
5 It has been one of my legislative priorities in the  
6 Senate. I believe the Permian Basin is the best  
7 location for the project, because of its unique ability  
8 to sequester the CO2 and represent a future of  
9 environmentally sensitive projects."

10 Thank you.

11 MR. McKOY: Okay. I'm not sure about the  
12 next person. Mike George, president of the Odessa  
13 Chamber of Commerce. Is Mike intending to comment?

14 MR. MICHAEL GEORGE: I didn't officially  
15 sign up. I will be more than happy to speak.

16 I'm Mike George, G-E-O-R-G-E. I'm  
17 president and CEO of the Odessa Chamber of Commerce. I  
18 would just like to say that we would concur that the  
19 Odessa-Penwell site, in our opinion, is the best place  
20 for this project, because all of the components of  
21 FutureGen, including the chemistry and the gas plant  
22 construction, the handling, the CO2, all the components

23 that make up the FutureGen project are all layered  
24 together here in one place where we have been doing all  
25 of those components individually for decades. And I

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1 don't think you will find that anywhere else in the  
2 country.

3 And we've welcomed FutureGen to Odessa and  
4 we think we have the work force that can handle it and  
5 the community is certainly very supportive, the entire  
6 region. So we welcome it. Thank you.

7 MR. McKOY: I apologize for the confusion  
8 on the list. The next speaker is -- and again, excuse  
9 me, I'm having a hard time reading this. It's John  
10 Boswell.

11 MR. BOSWELL: That would be me.

12 MR. McKOY: With -- I can't make out the  
13 writing.

14 MR. BOSWELL: Darrell McDonald Realtors  
15 from Midland. Thank you. I should have looked at the  
16 names of the people before me before I signed up on the  
17 list following Michael Williams and everybody. Just  
18 speaking as a citizen of Midland is what I wanted to do.  
19 I did not know there was a public meeting from 4 to 6 or  
20 I would have been here earlier. But I did want to  
21 comment that I have, in my world of real estate, been  
22 talking to people around Midland, and as much as we  
23 might have a rivalry on football, Midland is totally  
24 behind FutureGen coming to West Texas. And looking at  
25 the sites that the DOE has chosen, it just makes

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1 complete and total sense to come here and it's easy to  
2 be partial. We live here, we want the business, et  
3 cetera. But when you have an international airport,  
4 when you have La Entrada coming in, we have existing  
5 lines of communications with Mexico and China, as  
6 Midland and Odessa have sister cities in these  
7 countries, there is so much going on here.

8 We've been building up just for our own  
9 sake, let alone for the fact that we would like to have  
10 FutureGen come here, but Midland and Odessa both cities  
11 are on an upsurge, the likes of which neither has seen  
12 for many years. And we're used to booms and busts. The  
13 oil business has seen it all over and again. But now  
14 more than ever, Midland and Odessa are both prepared  
15 beyond belief.

16 We have people moving here from across the  
17 nation on a daily basis. I manage 200 rental units and  
18 I get calls and e-mails every day of people looking for  
19 a place to come to work for every occupation you can  
20 think of, not just coming here to work for the oil  
21 industry, and people transferring here from Dallas,  
22 which is (inaudible), but it's like you're coming here  
23 from Dallas? Colorado, Utah, Chicago, everywhere. I  
24 have not heard one negative thing. I can't think of one  
25 negative thing.

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1 Midland-Odessa is all about energy. We

2 have wind turbine farms in Big Spring and McCamey. We  
3 have the nuclear plant going in up at Andrews. We have  
4 this. We have oil and gas. You know, Stephanie  
5 Sparkman has been talking about how Permian Basin is the  
6 Energy Basin. And that's the absolute truth.

7 We are about as international as a little  
8 town can get and people are going to want to come to  
9 FutureGen from all over the world to see it, be a part  
10 of it, bring it to their country. And how are they  
11 going to be able to do that from some of the other  
12 locations? How are they going to be able to reach them?  
13 Where are they going to stay? Where are they going to  
14 go eat?

15 Some of the other cities are pretty small.  
16 Jewett is around larger cities and larger facilities,  
17 but Eastern Texas, in my opinion, is becoming highly  
18 congested. And that's why they're wanting to do a  
19 trans-Texas corridor and do this massive eight-lane  
20 freeway going north and south. And they're overdoing  
21 what they need to do, in my opinion, whereas here in  
22 Midland-Odessa, you've got the interstate, pow, you're  
23 right on the site. You've got airports ten minutes  
24 away. It's so easy here.

25 And just speaking as a public person from  
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1 the City of Midland, I've had some tough acts to follow  
2 here tonight, but Midland has your full support and you  
3 know, I'm anxious to see how this all works about and  
4 would like to see it come here. So that's all I was  
5 going to say.

6 MR. McKOY: The next commentor is Gil Van  
7 Deventer, Trident Environmental.

8 MR. GIL VAN DEVENTER: Thank you. That  
9 was very well stated. He stole some of my thunder, but  
10 I mean, we have the same thoughts there. My name is Gil  
11 Van Deventer. I'm a hydrogeologist with Trident  
12 Environmental, and we are a local environmental  
13 consulting company.

14 Other than being a resident in this great  
15 area of West Texas for the past 20 years -- I wasn't  
16 born here, got here quick as I could -- but I come here  
17 as an unbiased citizen. I have no financial interest in  
18 FutureGen. By that, I mean I'm not being paid by anyone  
19 to be here and speak my mind.

20 First of all, I'd like to say that I am  
21 very supportive of the Odessa site being chosen as the  
22 site for FutureGen. I read the Draft EIS in its  
23 entirety and I don't foresee any adverse significant  
24 impacts to the resources of the proposed site, other  
25 than improving of the chosen area.

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1 In particular, it will be a very  
2 beneficial effect to the division a resources, land use,  
3 social, economics, environmental, justice, community  
4 services, and utility infrastructure. I believe that  
5 the Odessa site is ideally located for environmental  
6 impact to environmental and commercial resources and

7 human health issues.  
8 And each of the remaining sites, Texas and  
9 Illinois, I'm sure they're going to have some  
10 significant impacts or difficult obstacles to overcome  
11 if chosen, and -- however, I think it will be well  
12 within our ability, especially here, to mitigate these  
13 impacts and reduce or eliminate their effects.

14 In fact, I don't think that's a bad thing  
15 to have, you know, some of these challenges, because for  
16 FutureGen to be a success, we need to meet these  
17 challenges by mitigating the various impacts so that we  
18 can learn from them and then transfer this technology to  
19 future FutureGens. And so by then, I'm very confident  
20 that the Odessa site will serve as the best model for a  
21 successful venture of this technology.

22 Permian Basin has long proven its ability  
23 to implement and advance innovative technology, because  
24 it has a great resource of educated and friendly people  
25 in the industry and accommodating business, governmental

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1 and residential atmosphere, well established and  
2 respected colleges and universities, and the existing  
3 utility and transportation corridors and other strategic  
4 qualities. It is these virtues that have made this area  
5 a successful source for distinguished individuals,  
6 including those in high public office in Washington.  
7 You might know of a few and elsewhere, and who are  
8 dividing our country on the right path forward and this  
9 is, you know, one of those right paths forward.

10 Meeting challenges, that's commonplace in  
11 the Permian Basin. I have been for several decades  
12 since the beginning of the oil and gas industry. Our  
13 confidence in that regard is why we're becoming a center  
14 of energy diversification. Like John said, I mean, that  
15 includes the wind and solar energy, nuclear energy, and  
16 hopefully soon, near zero emission coal-fired power  
17 generation. Thank you.

18 MR. MCKOY: Okay. According to my list,  
19 all of the registered commentators have now had a chance  
20 to speak. If you registered and I failed to call your  
21 name, please let me know now. At this point, I would  
22 like to open it up to unregistered commentators who would  
23 like to come up and speak for the first time. Please  
24 state your name for the record.

25 MR. WALDEN: Hello. I'm Steven Walden,

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1 and I'm here to represent the FutureGen Texas team. And  
2 primarily, what I'm trying to do is let you know that a  
3 lot of work has gone into this project, and I'm here  
4 primarily to congratulate the DOE and their contractors.  
5 They have done a marvelous job, and my tasks for the  
6 FutureGen Texas team, my role has been to oversee the  
7 environmental accumulation of the information and pass  
8 it on to them.

9 We sent them a mountain. They have melted  
10 and synthesized it and done all the risk analysis and  
11 have done a spectacular job of putting it together. I

12 commend you on this effort. It's Herculean. Good job.  
13 And unlike Jerry Oliver who was here earlier, he said he  
14 thought this time had passed fast. To me, it seems like  
15 we have been working on this since the Eisenhower  
16 administration. Good job, good job.

17 MR. McKOY: Do we have another person who  
18 would like to provide oral comment? Please keep in mind  
19 that it's not easy to come up and speak -- if you have  
20 concerns about the project or if you're not in favor of  
21 the project, it's particularly hard to do, following a  
22 number of commentators who have all been in favor of the  
23 project. But trust me, DOE really does want to hear  
24 from people who have concerns about the project and  
25 maybe even do not want the project. So I'm sure all of

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1 us will make people feel very comfortable sharing their  
2 comments, regardless of what their comments are. So  
3 again, I would like to encourage people, if you have  
4 concerns about the project, maybe you don't even want  
5 the project here, please don't hesitate to come up and  
6 speak and provide oral comment. We need to hear those  
7 comments, too. Alternatively, you can write those  
8 comments down and submit those comments to us.

9 On the other hand, we love to hear  
10 comments in support of the project. I have already  
11 received probably over 80 letters from the State of  
12 Texas. All of them have been in support of the project.  
13 There have been a few letters that have raised a few  
14 particular issues and we will look into those, but  
15 that's a lot of letters that support and most of them  
16 have come from the Odessa area.

17 So you all in Odessa -- you all in Odessa  
18 have shown a tremendous amount of support for the  
19 project.

20 MR. RICKY WRIGHT: I will add a little bit  
21 there, if you don't mind. I really didn't want to do  
22 this, but Mike and I have traveled this district. And  
23 as most of you know, District 11 stretches from Loving  
24 County, which is just west of here a hundred or million  
25 miles, wherever that is, we have been there several

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1 times, and it runs all the way over to Comanche County,  
2 which is where I'm from.

3 And as we have traveled, we have not heard  
4 one comment from any area within our district that is  
5 not for FutureGen and the project coming to Texas. And  
6 our district in Odessa has done a great job. Folks from  
7 my hometown, small communities like Goldthwaite and San  
8 Saba have even made comments, "Are you guys going to get  
9 this project? We think it's great. We'd love to see it  
10 happen. Texas needs it. We think Odessa is the place  
11 to put it." They believe in the Permian Basin and they  
12 believe in its ability to do things with energy.

13 So just as a side comment, Odessa is doing  
14 a great job. So is Midland and the Permian Basin as a  
15 whole, Monahans, Andrews, Big Lake, and so forth,  
16 they're all behind it. But there are even parts of

17 Texas that probably won't see it unless they come out  
18 here and visit, and they're for it. So you have got a  
19 strong support in Texas. And Michael, your oldest son  
20 in Texas wants it out here.

21 MR. McKOY: Thank you, Ricky Wright. Do  
22 we have anyone else who would like to provide comments?

23 MR. BOSWELL: I'm John Boswell. I did  
24 think of one other thing that I wanted to comment. I  
25 may have touched on this, but I want to hit it again.

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1 It's a real big thing for West Texas to hear something  
2 big coming and then it not happen. We've had, you know,  
3 various companies rumored to come to Midland, you know,  
4 oil companies and whatnot, doesn't happen. Walt Disney  
5 was going to have a Disney World here. Of course, that  
6 didn't happen. We had a Disney store for a little  
7 while.

8 You know, Midland and Odessa have heard  
9 the whole gambit of things coming here, yes, no, maybe  
10 so. This room is not nearly as full as it ought to be  
11 with the people who are in support of this. And they  
12 are skeptical, and with good reason. But they're all in  
13 favor of it, and I guarantee if this site was chosen,  
14 the Odessa site were chosen, you'd see support coming  
15 out of the woodwork. You would see people who have left  
16 Texas for jobs coming back to Texas just to, you know,  
17 be a part of it, because it's going -- the synergy that  
18 this is going to create, this is a one-time plant.

19 We're going to get it off the ground. We  
20 are going to learn a lot from it. But the growth  
21 potential from all of this, you know, the university is  
22 going to grow from this. Andrews, the surrounding  
23 communities there, the airport, the rail system, that's  
24 going to create La Entrada's real system going north to  
25 Denver and Colorado. The ramifications of it are

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1 monumental.

2 And I have seen the big picture and I have  
3 tried to communicate it to a lot of people and they're  
4 all like yeah, that's all good and great, go get it,  
5 John. And you know, I'm the one who's beating the drum  
6 and I'm doing the best I can. But I've been to Austin.  
7 I've met, you know, Mr. Seliger and many others and you  
8 know, we can only do so much. But you definitely have  
9 the support of Midland, and I just wanted to reiterate  
10 that one time.

11 MR. McKOY: Thank you, John Boswell. See,  
12 I even get a second chance to pronounce names correctly.  
13 And as you have all learned, sometimes I need a third.

14 Okay. Is there anyone else who would like  
15 to provide oral comment? It's not that bad to come up.  
16 Trust me. If I can get up here and talk, you can come  
17 up and provide comments, too. We have plenty of time.

18 MS. BEATRICE HEARD: Can someone say  
19 something from here?

20 MR. McKOY: You need to come here and  
21 speak to make sure everyone can hear you and the

22 transcriptionist can hear you. You need to come up here  
23 and state your name.

24 MS. BEATRICE HEARD: My name is Beatrice  
25 Heard, and I am a Midlander. And when they had the last  
0045

1 meeting, I came to the meeting and I work for MISD and I  
2 work for -- work with a man, he is a retired engineer.  
3 And he retired and became certified as a teacher and I  
4 was telling him, I said you know, I'm kind of interested  
5 in finding out more about FutureGen. And so he said,  
6 well, why don't you go to the meeting? So I said, oh,  
7 okay. So he finally talked me into it and when I drove  
8 up, I sat in my car for a few minutes. I said, oh God,  
9 I say, give me the strength, I said. I'm going in here  
10 with all these sorehead men. I said there will not be  
11 women there. I said first thing they're going to know  
12 why I'm out here. So I said, okay, God, you've got to  
13 give me the strength.

14 So I walked in and this pleasant lady was  
15 standing at the door, and I run up to her and I said,  
16 "Oh, thank God you're here." And so she said, "Why?"  
17 And I said, "I just thought I was going to be the only  
18 woman here." And so she said, "Come on in, come in  
19 here." So I came and she was very nice and the  
20 reception was very nice. And I picked up some  
21 information and everything and I've been keeping up with  
22 it.

23 As a matter of fact, I have every article  
24 on FutureGen I have cut out of the paper, trying to keep  
25 up with what's going on. But I just feel like the last  
0046

1 meeting I was there, it was 11 ladies. So it's about 30  
2 of us now. I don't know what you all are here for, but  
3 I have a little reason but I can't tell my little reason  
4 right now. But I am so pleased that this will come to  
5 Midland.

6 I hope -- I hope that you all will decide  
7 Midland will be -- Midland for the Permian Basin will be  
8 the site. And I don't know what you women are here for,  
9 but I know you're here for a reason, because they said  
10 behind every good man there is a woman. So there you  
11 see these women. And I just wanted to say, I appreciate  
12 you all considering Midland and I hope it comes to  
13 Midland. Thank you, very much.

14 MR. McKOY: For those of you providing  
15 comments, we would like to send a copy of the Final EIS  
16 to you. The Final EIS should include all of the  
17 substantive comments that we get. So provide your  
18 address and name to Rachel Spangenberg and Rachel can --  
19 stand up, Rachel, again. Provide that information to  
20 her. That will help us get a copy of the final EIS to  
21 you. Is there anyone else who would like to provide  
22 comment?

23 MS. MICHELLE MAYBERRY: Hello. My name is  
24 Michelle Mayberry, and a good person just left. His  
25 name is Michael Williams. He's the Railroad

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1 Commissioner. My mother didn't tell you, he's our  
2 cousin. And so as you can see, we all have the gift for  
3 talking. But I truly love my cousin and I highly  
4 endorse what he supports. So we in Midland and Odessa  
5 and the Permian Basin area, we truly would love to see  
6 you guys come to West Texas. This is a great  
7 opportunity for all of us to make West Texas more  
8 diversified and provide more opportunities,  
9 employment-wise. And just wouldn't it be great for us  
10 to be the first location in the world to have something  
11 like this?

12 So I look forward to it. I hope and pray  
13 that you guys will decide to come to West Texas, and we  
14 look forward to seeing you. Thank you and glad everyone  
15 is here.

16 MS. JESSICA SPARKMAN: I just had a really  
17 quick statement. And actually, I'm related to the  
18 environmental -- my name is Jessica Sparkman,  
19 S-P-A-R-K-M-A-N. I have seen the artistic  
20 representations of what the actual site will look like  
21 for the facility and I know that you guys went to the  
22 site yesterday and saw it. I haven't been to the other  
23 three, but I do know that I would guess that of the  
24 four, we would probably be the one that would have the  
25 best environmental impact locally. I think it would

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1 improve our beautification of the area quite a bit.

2 So I want to make sure that you understand  
3 that that's actually, environmentally, that's a big plus  
4 here that you can actually add to the beautification of  
5 the area. So I just wanted to add that comment.

6 MR. MCKOY: Thank you. Well, I have never  
7 heard before that a power plant might actually improve  
8 the area. And keep in mind, we don't really know how  
9 the power plant is going to actually look. That's an  
10 artistic rendition.

11 Do we have more comments? Please state  
12 your name for the record.

13 MR. MORSE HAYNES: Morse Haynes,  
14 M-O-R-S-E. Didn't really plan to talk today, but I  
15 thought any time I get an opportunity to talk about  
16 Monahans and this region, I thought I would go ahead and  
17 take advantage of that. And what I would like to stress  
18 on this is how it is a regional project and Odessa and  
19 Midland have been very strong in this. And all the  
20 communities around it are very supportive of them in  
21 this venture. And I know Monahans is and we have a  
22 great support there.

23 Just today, everywhere I go, well, what do  
24 you think about FutureGen? Well, I spend 20 minutes at  
25 the post office talking about how important FutureGen is

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1 and what it's going to do for this region. And anyway,  
2 not that we have -- what I would like to say is we have  
3 options. Midland-Odessa, quality of school systems,  
4 quality of communities, Monahans, Crane, Wink, Kermit,  
5 Andrews, all of them are quality. I think what the

6 difference would be, you have communities around the  
7 other sites but here you have quality, and I think that  
8 is a very important to the project. And again, as a  
9 region, we are very supportive of FutureGen. Thank you.

10 MR. McKOY: Do we have any more comments?  
11 Okay. One last call, anybody else?

12 Okay. Well, thank you for your comments  
13 and participation. Remember, that you may submit  
14 comments until July 16th, 2007. This concludes the  
15 public hearing for the FutureGen project. Let the  
16 record show that the hearing adjourned at 8:14 p.m. and  
17 thanks for your participation.

18 (Applause)  
19 (Public Meeting Adjourned)

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1 THE STATE OF TEXAS )  
2 COUNTY OF MIDLAND )  
3 I, Jane McGill, Certified Shorthand Reporter  
4 Number 1759 for The State of Texas and Certified  
5 Shorthand Reporter Number 125 for the State of New  
6 Mexico, do hereby certify that the facts stated by me in  
7 the caption hereof are true, and that I did, in  
8 computerized stenotype shorthand, report said  
9 proceedings and that the above and foregoing pages  
10 contain a full, true and correct computer-assisted  
11 transcription of my computerized stenotype shorthand  
12 notes taken on said occasion.

13 I further certify that I am neither counsel  
14 for, related to, nor employed by any of the parties or  
15 attorneys in the action in which this proceeding was  
16 taken, and further that I am not financially or  
17 otherwise interested in the outcome of the action.

18 Witness my hand this day of ,  
19 2007.

20  
21  
22 JANE MCGILL, Texas CSR No. 1759  
23 NM CSR No. 125 - Expires 12/31/08  
24 Permian Court Reporters, Inc.  
25 Firm Registration 155  
P.O. Box 10625  
Midland, Texas 79702  
PHONE: 432-683-3032  
FAX: 432-683-5324

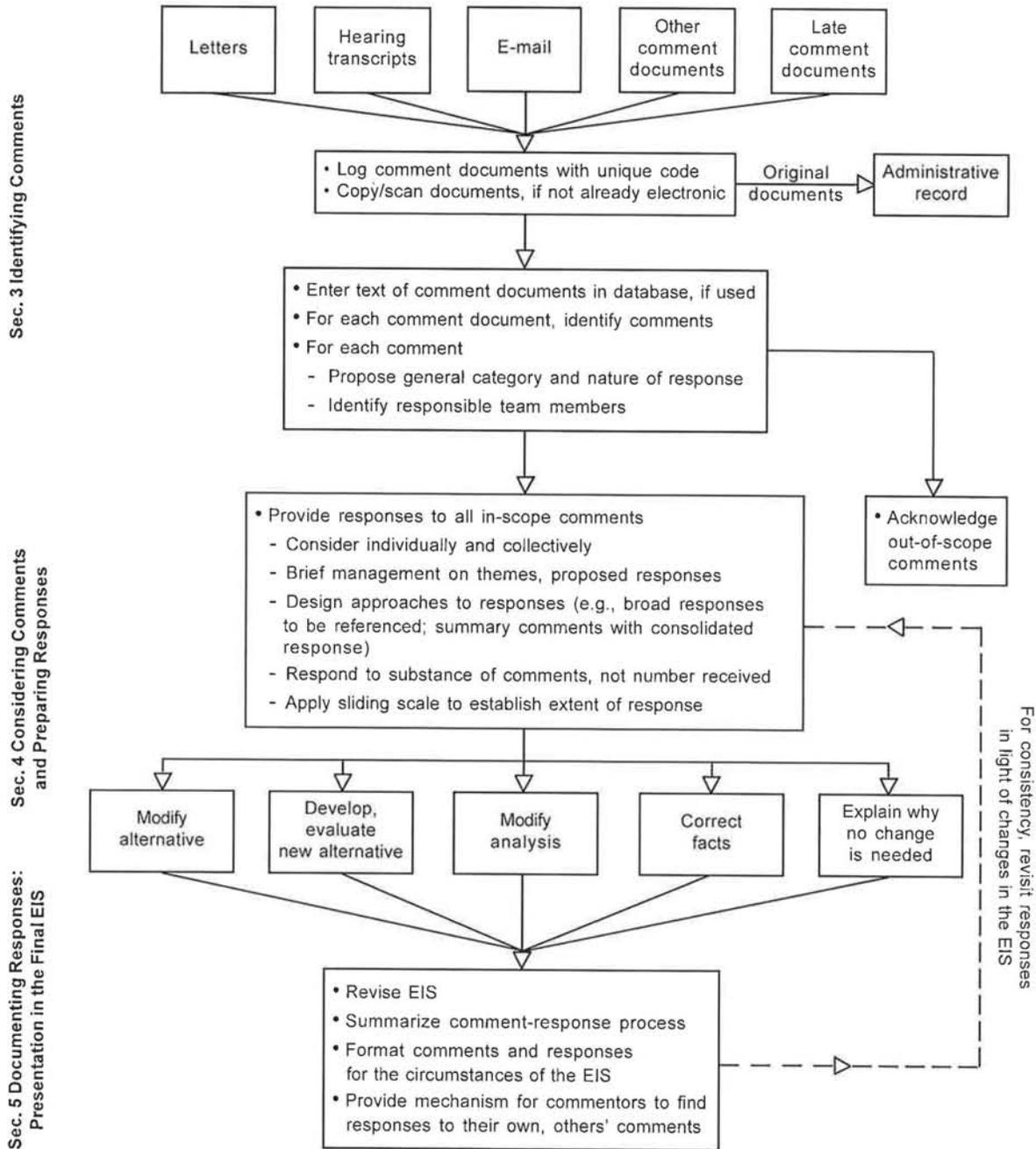
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**Appendix L – Comment - Response Flow Chart**

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# Flow Chart for the Comment-Response Process

This process is under the leadership of the DOE NEPA Document Manager



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