

**APPENDIX A**

**CONSULTATION LETTERS UNDER SECTION 7  
OF THE ENDANGERED SPECIES ACT**



## United States Department of the Interior

### FISH AND WILDLIFE SERVICE

3817 Luker Road  
Cortland, NY 13045



March 5, 2004

Ms. Pierina Noceti  
NEPA Specialist  
U.S. Department of Energy  
National Energy Technology Laboratory  
P.O. Box 10940  
Pittsburgh, PA 15236-0940

Dear Ms. Noceti:

This responds to your letter of February 19, 2004, requesting information on the presence of endangered or threatened species in the vicinity of the proposed multi-pollutant control system at the Greenidge Generating Station in the Town of Torrey, Yates County, New York.

Except for occasional transient individuals, no Federally listed or proposed endangered or threatened species under our jurisdiction are known to exist in the project impact area. In addition, no habitat in the project impact area is currently designated or proposed "critical habitat" in accordance with provisions of the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.). Therefore, no further Endangered Species Act coordination or consultation with the U.S. Fish and Wildlife Service (Service) is required. Should project plans change, or if additional information on listed or proposed species or critical habitat becomes available, this determination may be reconsidered. The most recent compilation of Federally listed and proposed endangered and threatened species in New York\* is available for your information.

The above comments pertaining to endangered species under our jurisdiction are provided pursuant to the Endangered Species Act. This response does not preclude additional Service comments under other legislation.

For additional information on fish and wildlife resources or State-listed species, we suggest you contact the appropriate New York State Department of Environmental Conservation regional office(s),\* and:

New York State Department of Environmental Conservation  
New York Natural Heritage Program Information Services  
625 Broadway  
Albany, NY 12233-4757  
(518) 402-8935

Since wetlands may be present, you are advised that National Wetlands Inventory (NWI) maps may or may not be available for the project area. However, while the NWI maps are reasonably

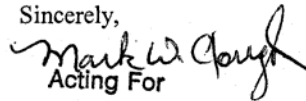
accurate, they should not be used in lieu of field surveys for determining the presence of wetlands or delineating wetland boundaries for Federal regulatory purposes. Copies of specific NWI maps can be obtained from:

Cornell Institute for Resource Information Systems  
302 Rice Hall  
Cornell University  
Ithaca, NY 14853  
(607) 255-4864

Work in certain waters of the United States, including wetlands, may require a permit from the U.S. Army Corps of Engineers (Corps). If a permit is required, in reviewing the application pursuant to the Fish and Wildlife Coordination Act, the Service may concur, with or without recommending additional permit conditions, or recommend denial of the permit depending upon potential adverse impacts on fish and wildlife resources associated with project construction or implementation. The need for a Corps permit may be determined by contacting the appropriate Corps office(s).\*

If you require additional information or assistance please contact Michael Stoll at (607) 753-9334.

Sincerely,



Mark W. Clough  
Acting For

David A. Stilwell  
Field Supervisor

\*Additional information referred to above may be found on our website at:  
<http://nyfo.fws.gov/es/esdesc.htm>.

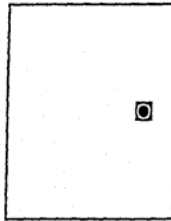
cc: NYSDEC, Avon, NY (Environmental Permits)  
NYSDEC, Albany, NY (Natural Heritage Program)  
COE, Buffalo, NY

U.S. Fish and Wildlife Service  
New York Field Office  
3817 Luker Road  
Cortland, NY 13045

To provide a timely response to future requests for endangered species comments in New York, please include the following in future inquiries:

1. A concise brief description of the project/action.
2. Name of the hamlet/village/city/town/county where the project/action occurs.
3. The latitude and longitude of the project/action, i.e.: 42° 13' 28" / 76° 56' 30". If the project/action is linear, you may provide coordinates for both ends or just one near center.
4. A map showing the project/action location. Preferrably the map should be a U.S. Geological Survey quadrangle map (USGS Quad). You need only provide a copy of that portion where the project/action occurs. Please provide the name(s) of the USGS quadrangle.

If providing only a portion, indicate where the portion would be located on the full quadrangle, i.e.



Providing the information above will assist us in responding to your needs.

If you require additional information please contact Michael Stoll at (607) 753-9334.



U.S. Department of Energy

National Energy Technology Laboratory



February 19, 2004

Chief, Division of Endangered Species  
U.S. Fish and Wildlife Service  
3817 Luker Road  
Cortland, NY 13045

Dear Sir:

The United States Department of Energy (DOE) is considering participation, through a 4.5-year cooperative agreement with CONSOL Energy, Inc., in a project to demonstrate an integrated, multi-pollutant control system on the 104-megawatt, Unit 4 boiler at the AES Greenidge Generating Station near Dresden, NY. Under the cooperative agreement, CONSOL and AES would design, install, operate, and evaluate a multi-pollutant control system for mercury, SO<sub>2</sub>, and NO<sub>x</sub>, acid gases, and particulate emissions control at the Greenidge Station.

The proposed project would require removal of the existing electrostatic precipitator on Unit 4 and installation of a selective catalytic reduction reactor for NO<sub>x</sub> control and a circulating dry scrubber for SO<sub>2</sub>, Hg, HCl, HF, and SO<sub>3</sub> control. The proposed control system would be expected to achieve the following control targets:

- NO<sub>x</sub> reduction to less than 0.122 lb/million Btu when firing coal or coal-biomass blends
- SO<sub>2</sub> reduction by 95% while the boiler is firing coal with more than 2% sulfur
- Mercury reduction by 90% using activated carbon injection
- Reductions in emissions of other acid gases (HCl, HF, and SO<sub>3</sub>) by 95%

A description of the proposed project and graphics depicting its location are provided as Enclosures.

As part of our coordination and consultation responsibilities, and to comply with both Section 7 of the Endangered Species Act of 1973, as amended, and provisions of the Fish & Wildlife Coordination Act, we would appreciate receiving any information you have on wildlife resources, including endangered and threatened species or critical habitat, in the project area.

Based on the scope of the proposed project, DOE plans to prepare an Environmental Assessment (EA), in accordance with requirements of the National Environmental Policy Act, to analyze, document, and disseminate information on the potential environmental consequences of the proposed project. Information that you provide will be incorporated and appropriately addressed in the EA. If your initial review concludes that no endangered or threatened species (or their habitat) are present in the project area, and that neither protected species nor their habitat would be affected by the proposed action, a written acknowledgement of that conclusion would be appreciated. In any case, the information that you provide will be considered in preparing a draft EA, which will be provided for review upon availability.



*U.S. Department of Energy*

*National Energy Technology Laboratory*



February 19, 2004

Should you require additional information, please contact me by telephone at 412-386-5428 or by e-mail at 'Pierina.Noceti@netl.doe.gov.'

Sincerely,

A handwritten signature in cursive script that reads "Pierina Noceti".

Pierina Noceti  
NEPA Specialist

Enclosures

## Description of the Proposed Action

### GREENIDGE MULTI-POLLUTANT CONTROL PROJECT

The proposed action is for DOE to provide, through a 4.5-year cooperative agreement with CONSOL Energy, Inc., financial assistance for demonstrating an integrated, Multi-Pollutant Control system on the 104-megawatt, Unit 4 boiler at the AES Greenidge Generating Station near Dresden, NY. Under the cooperative agreement, CONSOL and AES would design, install, operate, and evaluate the multi-pollutant control system for mercury, SO<sub>2</sub>, and NO<sub>x</sub>, acid gas, and particulate emissions control for application on coal-fired power generation systems.

The Multi-Pollutant Control system would be designed for long-term commercial operation following completion of the cooperative agreement with DOE. The total value of the cooperative agreement would be \$32.8 million; DOE's share would be approximately \$14.5 million.

The Greenidge Multi-Pollutant Control Project will demonstrate the commercial readiness of an emissions control system that, because of its low capital, operating, and maintenance costs, is particularly well suited to meet the emissions reduction requirements of a large group of smaller existing electricity generating units. The multi-pollutant control system offers the potential for low-cost, deep cleaning of air emissions, especially mercury, in support of the President's Clear Skies Initiative. Under the President's Clear Skies Initiative, emissions of SO<sub>2</sub> from power plants would be reduced by 73% from current emissions of 11 million tons annually to a cap of 4.5 million tons annually in 2010 and to 3 million tons annually in 2018. Emissions of NO<sub>x</sub> would be reduced by 67% from current level of 5 million tons annually to a cap of 2.1 million tons annually in 2008 and to 1.7 million tons annually in 2018. Mercury emissions would be reduced by 69% from current level of 48 tons to a cap of 26 tons in 2010 and 15 tons in 2018. The proposed project addresses the need for mercury emission reduction from coal-fired power plants, which stems from EPA's December 2000 announcement of plans to regulate emissions of mercury from coal-fired power plants. Successful implementation of the proposed technology demonstration would help provide an approach for achieving timely compliance with future mercury regulations.

Unit 4 at the Greenidge Generating Station would be the host facility for the proposed project. AES Greenidge Unit 4 is a tangentially fired, 104-megawatt electricity generator burning bituminous coals with sulfur content ranging from 1.4 to 2.8 percent. Currently, Unit 4 is equipped with only an electrostatic precipitator for emissions control. Unit 4 is considered to be representative of 492 coal-fired electricity generators in the United States with capacities ranging from 50 to 300 megawatts, which collectively represent about 25% of the U.S. coal-fired generating capacity.

The proposed project would require removal of the existing electrostatic precipitator on Unit 4 and installation of a single-bed, in-duct, selective catalytic reduction (SCR) reactor for NO<sub>x</sub> control and a circulating dry scrubber (CDS) for SO<sub>2</sub>, Hg, HCl, HF, and SO<sub>3</sub> control. The proposed control system would be expected to achieve the following control targets:

- NO<sub>x</sub> reduction to less than 0.122 lb/million Btu using a single-bed, in-duct SCR unit in combination with low-NO<sub>x</sub> combustion technology when firing coal or coal-biomass blends
- SO<sub>2</sub> reduction by 95% using the CDS system while the boiler is firing coal with more than 2% sulfur
- Mercury reduction by 90% using activated carbon injection into the CDS unit
- Reductions in emissions of other acid gases (HCl, HF, and SO<sub>3</sub>) by 95% in the CDS

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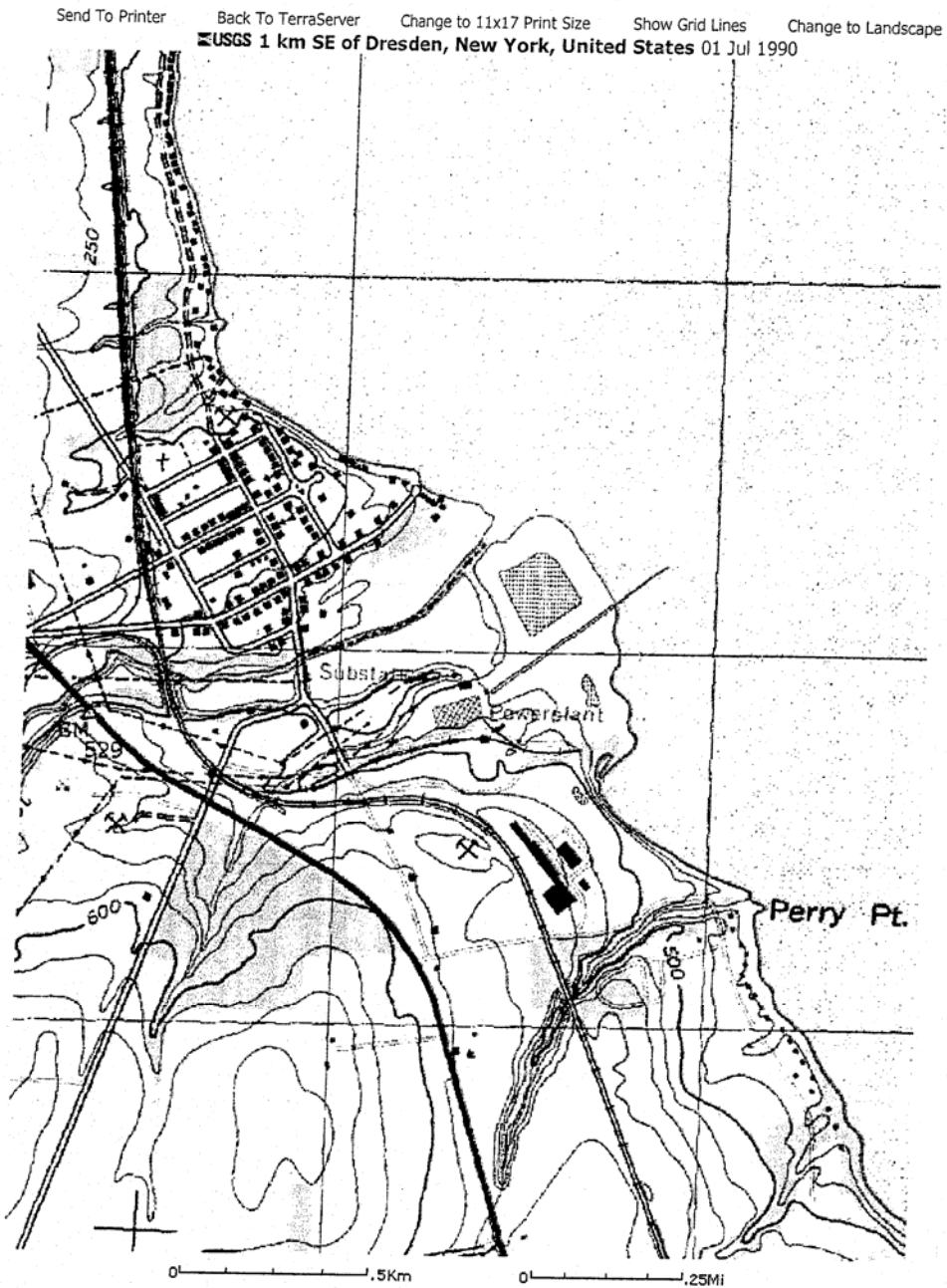
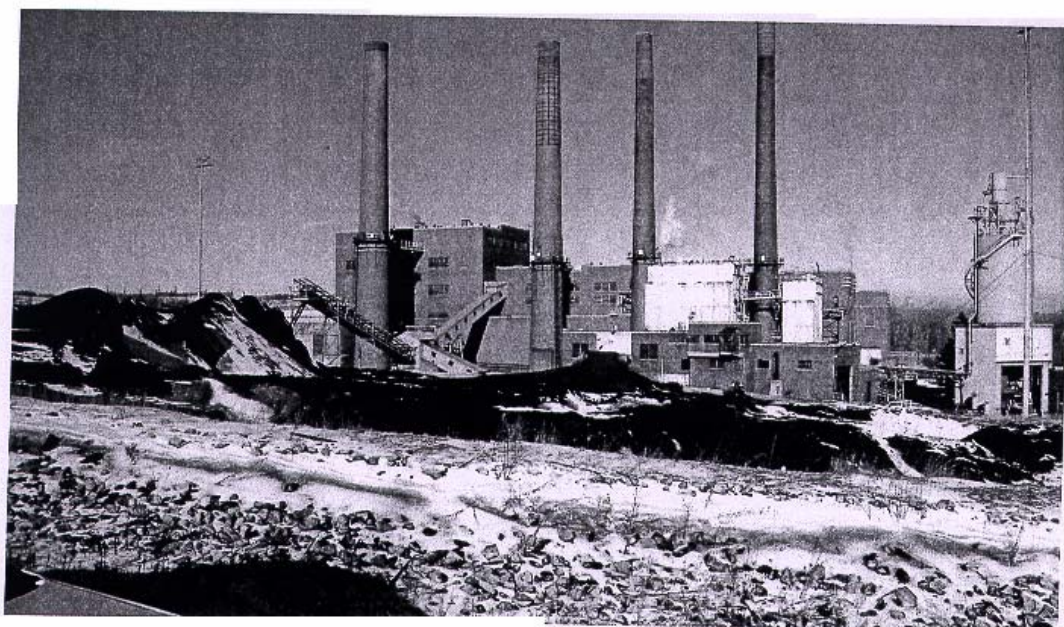
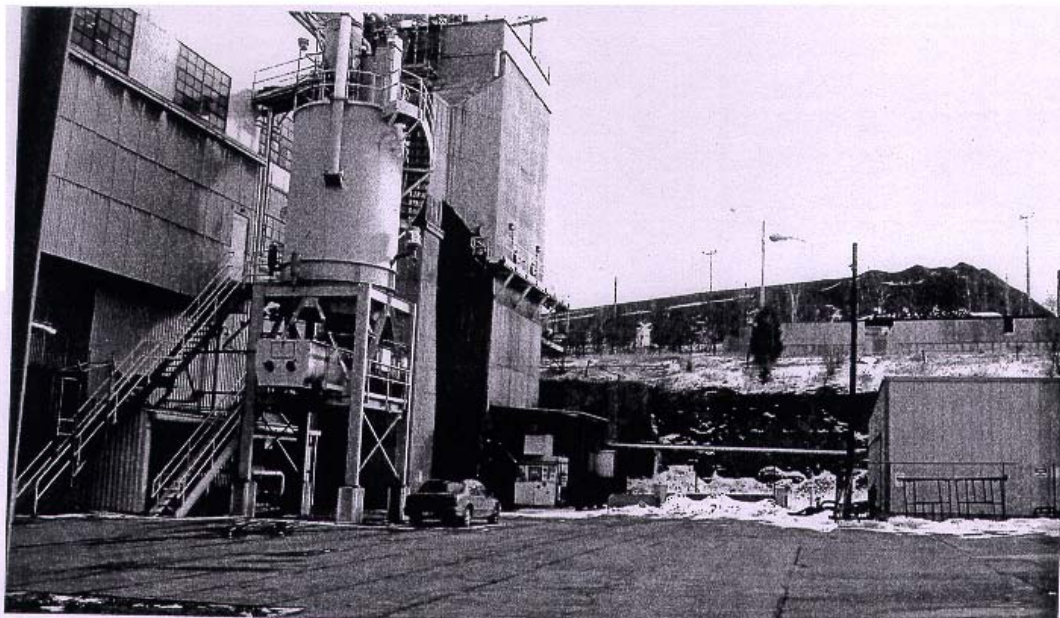


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U.S. Department of Energy

National Energy Technology Laboratory



February 19, 2004

Chief, Division of Endangered Species  
U.S. Fish and Wildlife Service  
300 Westgate Center Drive  
Hadley, MA 01035

Dear Sir:

The United States Department of Energy (DOE) is considering participation, through a 4.5-year cooperative agreement with CONSOL Energy, Inc., in a project to demonstrate an integrated, multi-pollutant control system on the 104-megawatt, Unit 4 boiler at the AES Greenidge Generating Station near Dresden, NY. Under the cooperative agreement, CONSOL and AES would design, install, operate, and evaluate a multi-pollutant control system for mercury, SO<sub>2</sub>, and NO<sub>x</sub>, acid gases, and particulate emissions control at the Greenidge Station.

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As part of our coordination and consultation responsibilities, and to comply with both Section 7 of the Endangered Species Act of 1973, as amended, and provisions of the Fish & Wildlife Coordination Act, we would appreciate receiving any information you have on wildlife resources, including endangered and threatened species or critical habitat, in the project area.

Based on the scope of the proposed project, DOE plans to prepare an Environmental Assessment (EA), in accordance with requirements of the National Environmental Policy Act, to analyze, document, and disseminate information on the potential environmental consequences of the proposed project. Information that you provide will be incorporated and appropriately addressed in the EA. If your initial review concludes that no endangered or threatened species (or their habitat) are present in the project area, and that neither protected species nor their habitat would be affected by the proposed action, a written acknowledgement of that conclusion would be appreciated. In any case, the information that you provide will be considered in preparing a draft EA, which will be provided for review upon availability.

626 Cochran's Mill Road, P.O. Box 10940, Pittsburgh, PA 15236-0940    □    3610 Collins Ferry Road, P.O. Box 880, Morgantown, WV 26507-0880  
REPLY TO: Pittsburgh Office • Pierina.Noceti@netl.doe.gov • Voice (412) 386-5428 • Fax (412) 386-4775 • www.netl.doe.gov



*U.S. Department of Energy*

*National Energy Technology Laboratory*



February 19, 2004

Should you require additional information, please contact me by telephone at 412-386-5428 or by e-mail at 'Pierina.Noceti@netl.doe.gov.'

Sincerely,

A handwritten signature in black ink that reads "Pierina Noceti".

Pierina Noceti  
NEPA Specialist

Enclosures

## Description of the Proposed Action

### GREENIDGE MULTI-POLLUTANT CONTROL PROJECT

The proposed action is for DOE to provide, through a 4.5-year cooperative agreement with CONSOL Energy, Inc., financial assistance for demonstrating an integrated, Multi-Pollutant Control system on the 104-megawatt, Unit 4 boiler at the AES Greenidge Generating Station near Dresden, NY. Under the cooperative agreement, CONSOL and AES would design, install, operate, and evaluate the multi-pollutant control system for mercury, SO<sub>2</sub>, and NO<sub>x</sub>, acid gas, and particulate emissions control for application on coal-fired power generation systems.

The Multi-Pollutant Control system would be designed for long-term commercial operation following completion of the cooperative agreement with DOE. The total value of the cooperative agreement would be \$32.8 million; DOE's share would be approximately \$14.5 million.

The Greenidge Multi-Pollutant Control Project will demonstrate the commercial readiness of an emissions control system that, because of its low capital, operating, and maintenance costs, is particularly well suited to meet the emissions reduction requirements of a large group of smaller existing electricity generating units. The multi-pollutant control system offers the potential for low-cost, deep cleaning of air emissions, especially mercury, in support of the President's Clear Skies Initiative. Under the President's Clear Skies Initiative, emissions of SO<sub>2</sub> from power plants would be reduced by 73% from current emissions of 11 million tons annually to a cap of 4.5 million tons annually in 2010 and to 3 million tons annually in 2018. Emissions of NO<sub>x</sub> would be reduced by 67% from current level of 5 million tons annually to a cap of 2.1 million tons annually in 2008 and to 1.7 million tons annually in 2018. Mercury emissions would be reduced by 69% from current level of 48 tons to a cap of 26 tons in 2010 and 15 tons in 2018. The proposed project addresses the need for mercury emission reduction from coal-fired power plants, which stems from EPA's December 2000 announcement of plans to regulate emissions of mercury from coal-fired power plants. Successful implementation of the proposed technology demonstration would help provide an approach for achieving timely compliance with future mercury regulations.

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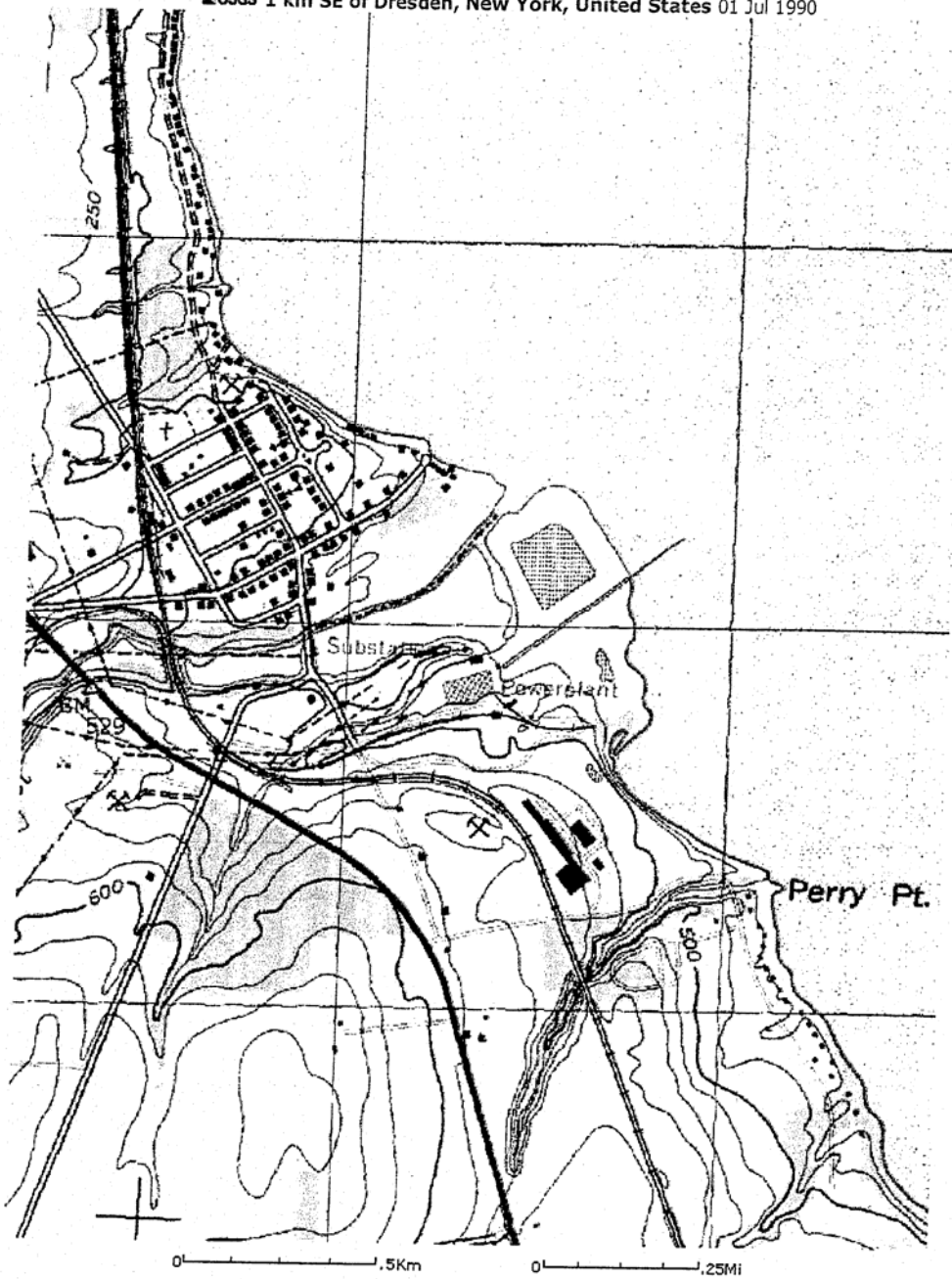
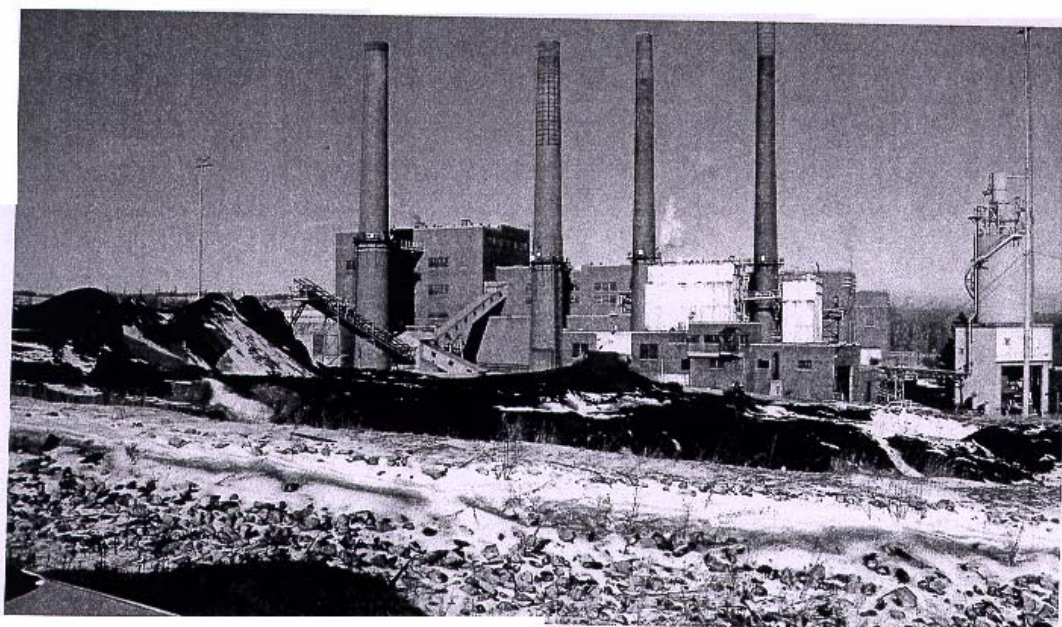
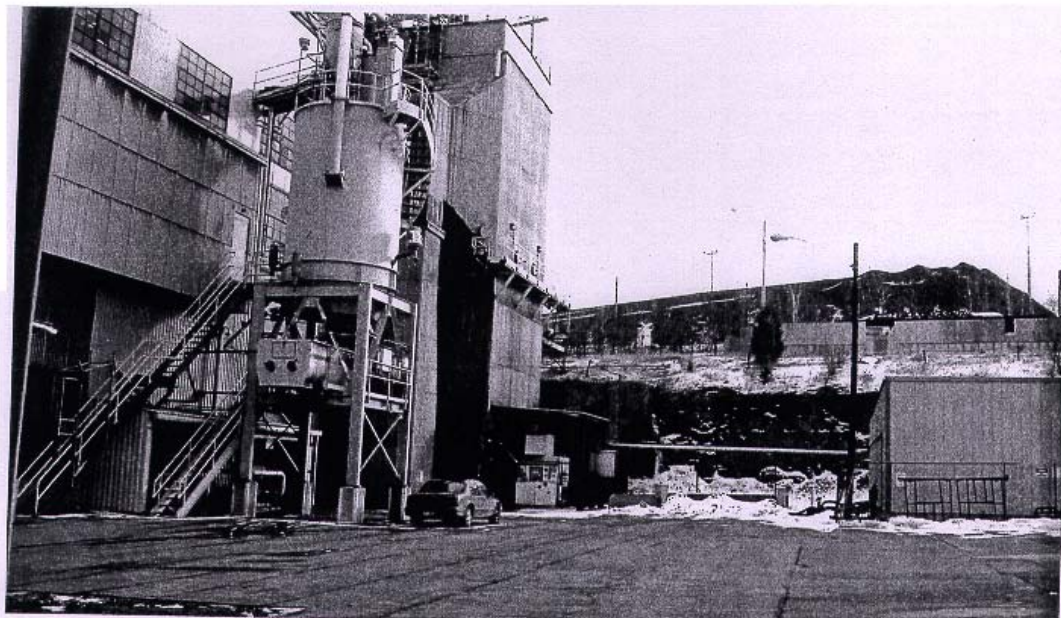


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# Greenidge Multi-Pollutant Control Project



U.S. Department of Energy

National Energy Technology Laboratory



March 19, 2004

Ms. Jean Pietrusiak  
New York State  
Department of Environmental Conservation  
Information Services  
625 Broadway, 5<sup>th</sup> Floor  
Albany, NY 12233-4757

Dear Ms. Pietrusiak:

The United States Department of Energy (DOE) is considering participation, through a 4.5-year cooperative agreement with CONSOL Energy, Inc., in a project to demonstrate an integrated, multi-pollutant control system on the 104-megawatt, Unit 4 boiler at the AES Greenidge Generating Station near Dresden, NY. Under the cooperative agreement, CONSOL and AES would design, install, operate, and evaluate a multi-pollutant control system for mercury, SO<sub>2</sub>, and NO<sub>x</sub>, acid gases, and particulate emissions control at the Greenidge Station.

The proposed project would require removal of the existing electrostatic precipitator on Unit 4 and installation of a selective catalytic reduction reactor for NO<sub>x</sub> control and a circulating dry scrubber for SO<sub>2</sub>, Hg, HCl, HF, and SO<sub>3</sub> control. The proposed control system would be expected to achieve the following control targets:

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- Mercury reduction by 90% using activated carbon injection
- Reductions in emissions of other acid gases (HCl, HF, and SO<sub>3</sub>) by 95%

A description of the proposed project and graphics depicting its location are provided as Enclosures.

As part of our coordination and consultation responsibilities, and to comply with both Section 7 of the Endangered Species Act of 1973, as amended, and provisions of the Fish & Wildlife Coordination Act, we would appreciate receiving any information you have on wildlife resources, including endangered and threatened species or critical habitat, in the project area.

Based on the scope of the proposed project, DOE plans to prepare an Environmental Assessment (EA), in accordance with requirements of the National Environmental Policy Act, to analyze, document, and disseminate information on the potential environmental consequences of the proposed project. Information that you provide will be incorporated and appropriately addressed in the EA. If your initial review concludes that no endangered or threatened species (or their habitat) are present in the project area, and that neither protected species nor their habitat would be affected by the proposed action, a written acknowledgement of that conclusion would be appreciated. In any case, the information that you provide will be considered in preparing a draft EA, which will be provided for review upon availability.



*U.S. Department of Energy*

*National Energy Technology Laboratory*



March 19, 2004

Should you require additional information, please contact me by telephone at 412-386-5428 or by e-mail at 'Pierina.Noceti@netl.doe.gov.'

Sincerely,

A handwritten signature in black ink, appearing to read "Pierina Noceti".

Pierina Noceti  
NEPA Specialist

Enclosures

## Description of the Proposed Action

### GREENIDGE MULTI-POLLUTANT CONTROL PROJECT

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The Multi-Pollutant Control system would be designed for long-term commercial operation following completion of the cooperative agreement with DOE. The total value of the cooperative agreement would be \$32.8 million; DOE's share would be approximately \$14.5 million.

The Greenidge Multi-Pollutant Control Project will demonstrate the commercial readiness of an emissions control system that, because of its low capital, operating, and maintenance costs, is particularly well suited to meet the emissions reduction requirements of a large group of smaller existing electricity generating units. The multi-pollutant control system offers the potential for low-cost, deep cleaning of air emissions, especially mercury, in support of the President's Clear Skies Initiative. Under the President's Clear Skies Initiative, emissions of SO<sub>2</sub> from power plants would be reduced by 73% from current emissions of 11 million tons annually to a cap of 4.5 million tons annually in 2010 and to 3 million tons annually in 2018. Emissions of NO<sub>x</sub> would be reduced by 67% from current a current level of 5 million tons annually to a cap of 2.1 million tons annually in 2008 and to 1.7 million tons annually in 2018. Mercury emissions would be reduced by 69% from current level of 48 tons to a cap of 26 tons in 2010 and 15 tons in 2018. The proposed project addresses the need for mercury emission reduction from coal-fired power plants, which stems from EPA's December 2000 announcement of plans to regulate emissions of mercury from coal-fired power plants. Successful implementation of the proposed technology demonstration would help provide an approach for achieving timely compliance with future mercury regulations.

Unit 4 at the Greenidge Generating Station would be the host facility for the proposed project. AES Greenidge Unit 4 is a tangentially fired, 104-megawatt electricity generator burning bituminous coals with sulfur content ranging from 1.4 to 2.8 percent. Currently, Unit 4 is equipped with only an electrostatic precipitator for emissions control. Unit 4 is considered to be representative of 492 coal-fired electricity generators in the United States with capacities ranging from 50 to 300 megawatts, which collectively represent about 25% of the U.S. coal-fired generating capacity.

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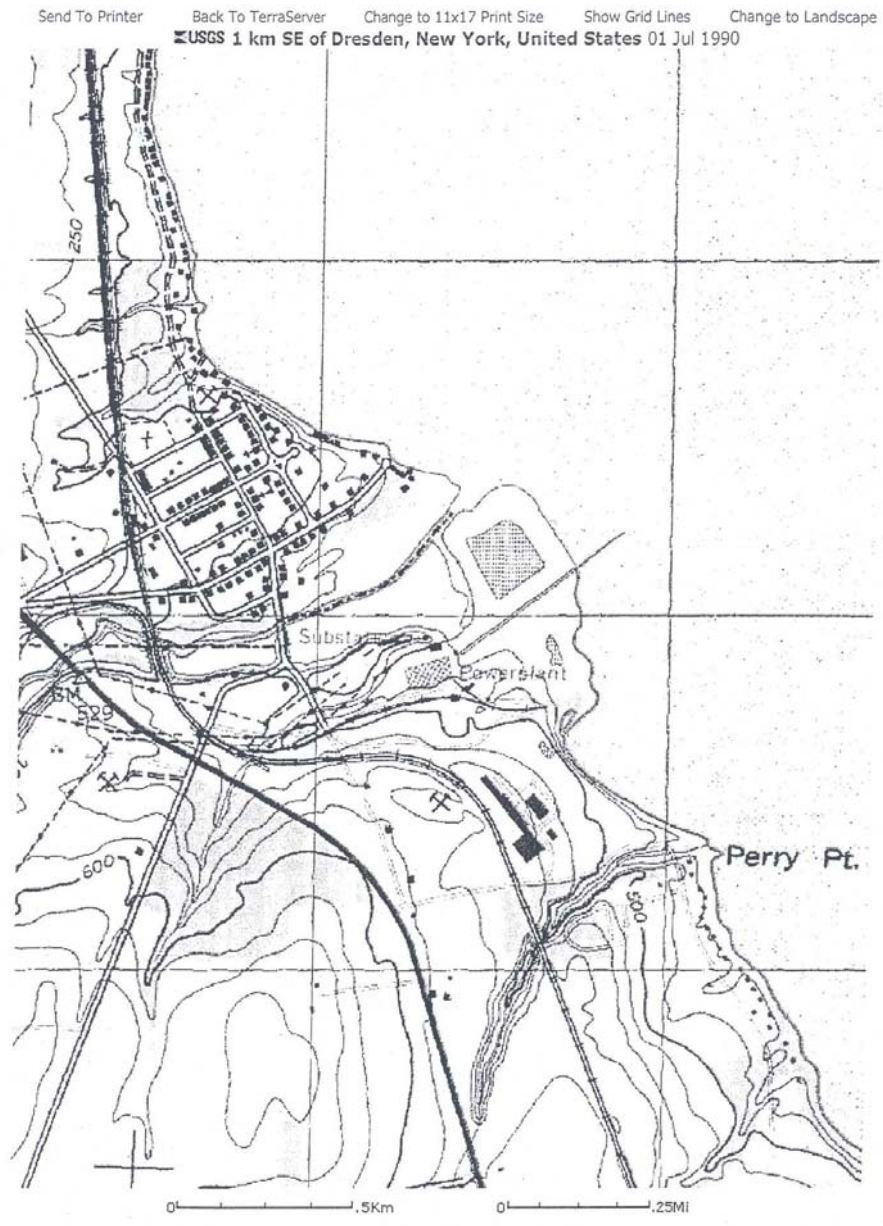
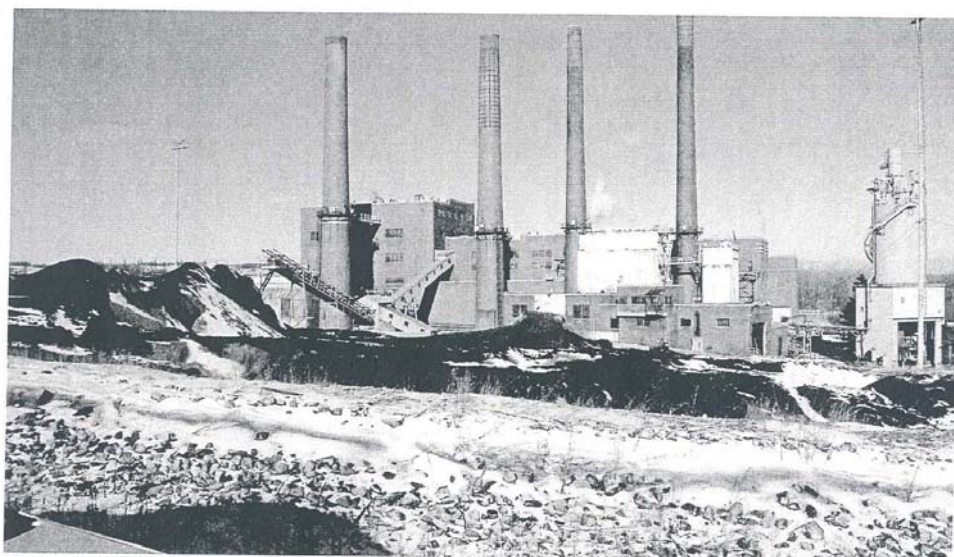
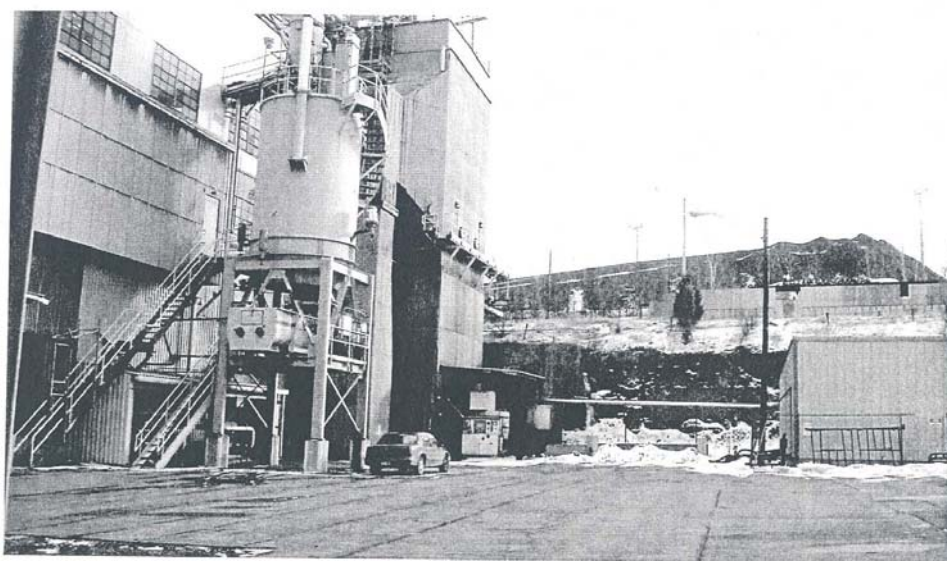


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**APPENDIX B**

**CONSULTATION LETTERS UNDER SECTION 106 OF THE  
NATIONAL HISTORIC PRESERVATION ACT**



U.S. Department of Energy

National Energy Technology Laboratory



February 18, 2004

Ms. Bernadette Castro  
 State Historic Preservation Officer  
 Parks, Recreation, and Historic Preservation Agency  
 Building #1, Empire State Plaza  
 Albany, NY 12238

Dear Ms. Castro:

The United States Department of Energy (DOE) is considering participation, through a 4.5-year cooperative agreement with CONSOL Energy, Inc., in a project to demonstrate an integrated, multi-pollutant control system on the 104-megawatt, Unit 4 boiler at the AES Greenidge Generating Station near Dresden, NY. Under the cooperative agreement, CONSOL and AES would design, install, operate, and evaluate a multi-pollutant control system for mercury, SO<sub>2</sub>, and NO<sub>x</sub>, acid gases, and particulate emissions control at the Greenidge Station.

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- Reductions in emissions of other acid gases (HCl, HF, and SO<sub>3</sub>) by 95%

A description of the proposed project and graphics depicting its location are provided as Enclosures.

As part of our coordination and consultation responsibilities, and to comply with provisions implementing Section 106 of the National Historic Preservation Act of 1966, we would appreciate receiving any information you have regarding historic or cultural properties in the project area.

Based on the scope of the proposed project, DOE has initiated preparation of an Environmental Assessment (EA), in accordance with requirements of the National Environmental Policy Act, to analyze, document, and disseminate information on the potential environmental consequences of the proposed project. Information that you provide will be incorporated and appropriately addressed in the EA. If your initial review concludes that no historic or cultural properties are present in the project area, a written acknowledgement of that conclusion would be appreciated. In any case, the information that you provide will be considered in preparing a draft EA, which will be provided for review upon availability.



Greenidge Multi-Pollutant Control Project



*U.S. Department of Energy*

*National Energy Technology Laboratory*



February 18, 2004

Should you require additional information, please contact me by telephone at 412-386-5428 or by e-mail at 'pierina.noceti@netl.doe.gov.'

Sincerely,

A handwritten signature in black ink that reads "Pierina Noceti".

Pierina Noceti  
NEPA Specialist

Enclosures

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The Greenidge Multi-Pollutant Control Project will demonstrate the commercial readiness of an emissions control system that, because of its low capital, operating, and maintenance costs, is particularly well suited to meet the emissions reduction requirements of a large group of smaller existing electricity generating units. The multi-pollutant control system offers the potential for low-cost, deep cleaning of air emissions, especially mercury, in support of the President's Clear Skies Initiative. Under the President's Clear Skies Initiative, emissions of SO<sub>2</sub> from power plants would be reduced by 73% from current emissions of 11 million tons annually to a cap of 4.5 million tons annually in 2010 and to 3 million tons annually in 2018. Emissions of NO<sub>x</sub> would be reduced by 67% from current a current level of 5 million tons annually to a cap of 2.1 million tons annually in 2008 and to 1.7 million tons annually in 2018. Mercury emissions would be reduced by 69% from current level of 48 tons to a cap of 26 tons in 2010 and 15 tons in 2018. The proposed project addresses the need for mercury emission reduction from coal-fired power plants, which stems from EPA's December 2000 announcement of plans to regulate emissions of mercury from coal-fired power plants. Successful implementation of the proposed technology demonstration would help provide an approach for achieving timely compliance with future mercury regulations.

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Greenidge Multi-Pollutant Control Project

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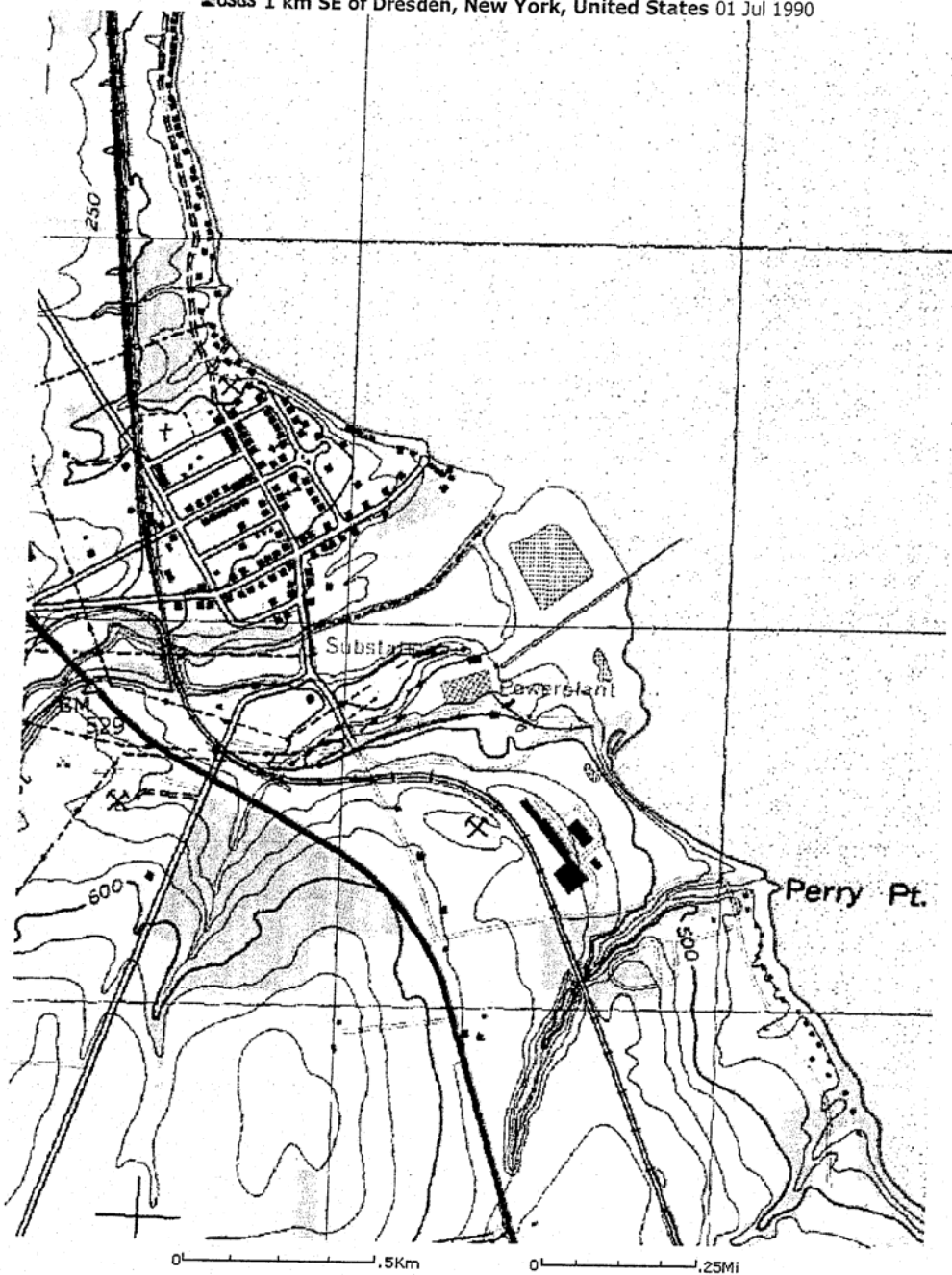
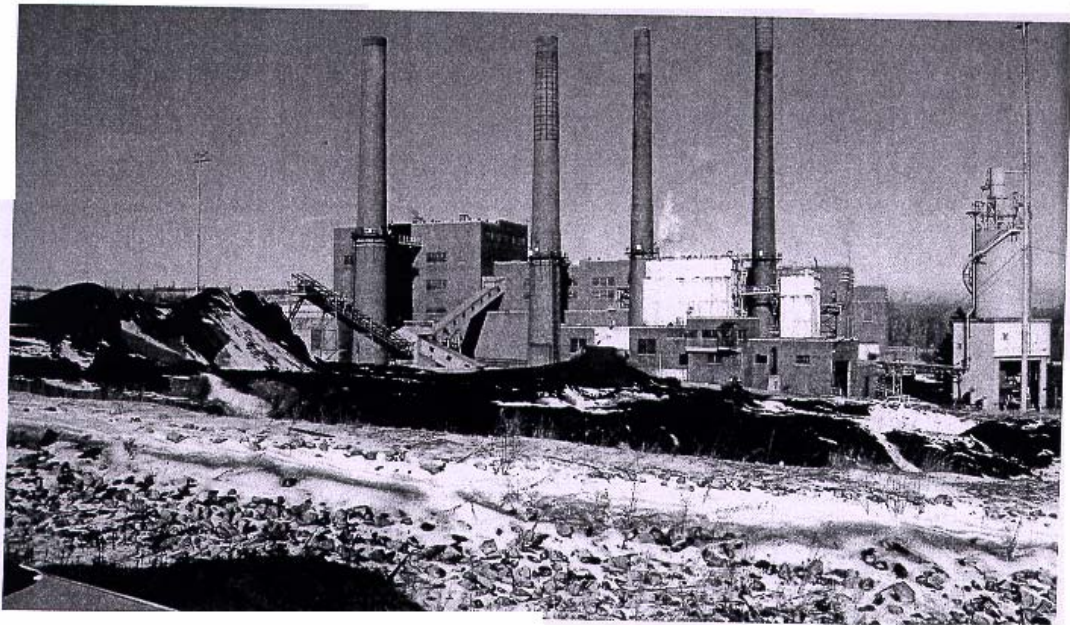
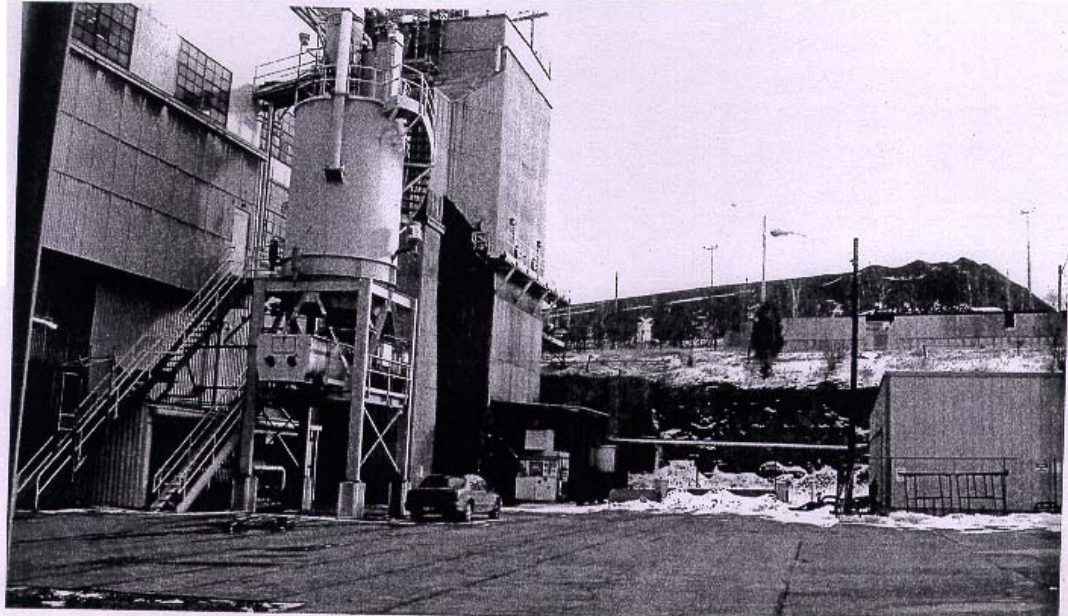


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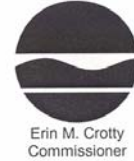
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Greenidge Multi-Pollutant Control Project



**APPENDIX C**  
**PUBLIC PARTICIPATION LETTERS**

**New York State Department of Environmental Conservation**  
**Division of Environmental Permits, Region 8**  
6274 East Avon-Lima Road, Avon, New York 14414-9519  
**Phone:** (585) 226-2466 • **FAX:** (585) 226-2830  
**Website:** www.dec.state.ny.us



July 22, 2004

Pierina Noceti  
U S Dept of Energy  
National Energy Technology Lab  
P O Box 10940  
Pittsburgh PA 15236

**Regarding: Comments on Draft Environmental Assessment**  
Greenidge Multi-Pollutant Control Project  
CONSOL Energy Inc and AES Greenidge LLC  
Greenidge Station  
Town of Torrey, Yates County New York

Dear Ms. Noceti:

In response to the May 2004 Draft Environmental Assessment for the project, the Region 8 Office of New York State Dept. of Environmental Conservation offers the following comments:

- 1) A modification of the Title IV and Title V Facility Permits will be required as indicated on page 7-3 of the Draft EA.
- 2) A modification of the State Pollutant Discharge Elimination System (SPDES) Permit will be required as indicated on page 7-4 of the Draft EA.
- 3) A modification of the SPDES Permit and/or the Part 360 Solid Waste Management Permit for the Lockwood Ash Disposal Site will be required.
- 4) The drinking water standard upper limit for mercury on page 4-12 should be revised to 0.8 ppb from the indicated 2 ppb.

Thank you for your consideration.

Sincerely,



Roger McDonough  
Environmental Analyst  
Division of Environmental Permits

cc: F. Grabar - Division of Air Resources  
D. Persson - Division of Water  
S. Foti - Division of Solid & Hazardous Materials

**New York State Department of Environmental Conservation**

**Division of Solid and Hazardous Materials, Region 8**

6274 East Avon-Lima Road, Avon, New York 14414-9519

Phone: (585) 226-2466 • FAX: (585) 226-2909

Website: [www.dec.state.ny.us](http://www.dec.state.ny.us)



Erin M. Crotty  
Commissioner

August 10, 2004

Pierina Noceti  
U S Dept of Energy  
National Energy Technology Lab  
PO Box 10940  
Pittsburgh, Pa 15236

Ms. Noceti:

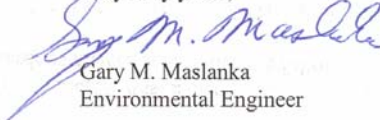
RE: Comments on Draft Environmental Assessment  
Greenidge Multi-Pollutant Control Project  
CONSOL Energy Inc and AES Greenidge LLC  
Town of Torrey, Yates County

In response to the May 2004 Draft Environmental Assessment for the above project, Region 8 NYSDEC, Division of Solid and Hazardous materials provides the following comments.

- 1) A NYSDEC case specific Beneficial Use Determination (BUD) would be required before flyash could be used in total or as part of a soil amendment. See 6 NYCRR Part 360 Section 360-1.15 for details on BUDs.
- 2) Be aware that material, be it flyash, bottom ash, etc, exhibiting elevated levels of leachability and/or total metals, but below thresholds that would characterize the material as hazardous waste, may not be appropriate for certain uses. This may include land application, use as a traction agent, or use as an aggregate in the manufacture of concrete block..

If you have any questions or concerns regarding these comments please contact me by phone at (585) 226-5414, or via e-mail at [gmmaslan@gw.dec.state.ny.us](mailto:gmmaslan@gw.dec.state.ny.us)

Very truly yours,

  
Gary M. Maslanka  
Environmental Engineer