

Cash Creek Hearing: Talking Points

Problems with the Wastewater Discharge Limits in the Draft Permit

- Little is known about what the Cash Creek plant will release and how polluting it will be.
- Kentucky Department of Environmental Protection (KDEP) has created discharge limits without researching what other gasification plants release. Limits are supposed to be based on actual, observed data, or information from similar plants. KDEP has not researched similar plants.
- This is alarming, because the Wabash River Coal Gasification Plant (a similar plant to Cash Creek) didn't meet its pollution limits during its first five years even though it was not working at full power for the first four years.
- At Wabash Coal Plant, wastewaters that didn't meet limits and/or follow regulations were extremely difficult and expensive to treat, costing millions of dollars. This does not bode well for Cash Creek.

Understated and Misclassified Industrial Discharge Risks

- In the Draft Permit, some wastewater discharges are listed as "low flow" when they actually are a "major industry" discharge. This mislabeling downplays the real impact and risk of the discharge.
- Monitoring and sampling is not required often enough in the draft permit to figure out what will really be released into the Green River. The sampling requirements in the Draft Permit vary from weekly to annually. At the Wabash plant, wastewater discharges vary every day, sometimes not meeting limits daily for five (5) years. The Draft Permit should include comprehensive daily sampling until the make-up of the discharge is completely known and does not exceed the limits.

Inadequate Monitoring to Protect Citizens

- Cash Creek estimated that sulfates, phenols, nitrates, fluorides, phosphorous, and metals will be in the waste streams from the plant- yet the Draft Permit includes no monitoring whatsoever for those chemicals and pollutants.
- Also, Chemical Oxygen Demand (COD) is likely to be present in all wastewater outfalls, but there is no testing for it, either, in the Draft Permit requirements. This pollutant endangers fish in the Green River and should be controlled.

The Plant Will Discharge Hot Water

- The Draft permit's limits on releasing hot water are weaker than state regulations require (401 KAR 10:031, Section 4). Normal daily and seasonal temperature variations are ignored by the permit, which allows releasing millions of gallons per day at 89° F even in the middle of the winter.

Negative Impact on the Green River

- The plant and its water pollution will deter people from fishing on the Green River, hurting the local economy.
- Cash Creek has also not successfully shown that the proposed discharges will protect a balanced population of native species in the Green River.

- The Green River is listed as a High Quality Water (401 KAR 10:030(3)), and the Draft Permit does not meet the rules for discharge in this type of water.
- Under federal law, High Quality waters may only be polluted if it is necessary for important social and economic development in the area and if there are no cleaner options available.
- Cash Creek doesn't meet these factors because this plant is not economically necessary. There are cleaner options available, which haven't been included.
- Cash Creek even tried to say that the Green River isn't a High Quality Water by referring to fish consumption warnings, which don't matter for the classification.
- The sampling requirements for sanitary wastewater discharges don't meet the KDEP standards.
- Cash Creek has extremely high cooling water demands. Cooling water systems cause a lot of harm to the environment.
 - In the Southeast, which often is stressed by droughts, power plants suck 40 billion gallons of water from rivers every day, which is 65% of all withdrawals from freshwater. The fish and wildlife in these waters often die. An example of this can be seen at the Coleman Power Plant in Henderson County where over 700,000 fish are lost every year.
- Under federal and Kentucky law, Cash Creek must reduce its water intake to meet that of a well-designed closed cooling system. Cash Creek will take 14.1 million gallons from the river every day. Cash Creek could easily use a dry cooling system (which uses no water) or a more water-efficient closed cooling system.
- If Cash Creek used a dry cooling system, it would use only 800,000 gallons of water per day, much less than the proposed amount (14.1 million). If Cash Creek were to be built, it should be forced to use this system because it's required under law to reduce its water intake.

Dangerous Run-off and Leachate from Coal Waste

- Coal combustion waste is hazardous. It contains heavy metals and has polluted water supplies where it is not properly stored. Cash Creek claims that its waste – coal slag - - is less dangerous than some forms of waste, but it still poses risks if it is not carefully managed. The permit's safeguards for run-off and leachate from the slag landfill are not strong enough to ensure public safety.
- The discharge limits for leachate and landfill stormwater runoff from the plant do not comply with state regulation - 401 KAR 5:065.
- Cash Creek presented theoretical leaching data using a faulty method that does not consider actual conditions at the plant. The National Academies of Science recommends other tests, which the Draft Permit should require instead.
- The KPDES application submitted by Cash Creek says the characteristics of whatever will leach from the plant slag is unknown. The permit should protect the public from all potential pollutants, and it does not!

Air Pollution

- The plant will also cause air pollution and smog, harming surrounding communities. Dirty air threatens public health, and discourages business from coming to the area and creating local jobs.