

Appendix C: Summary of EA Scoping Comments and Draft EA Comments

In order to maximize public participation and input in the environmental review process for the Oneida Energy Recovery Project, DOE initiated a public scoping period from March 31 to May 15, 2011. During this time, DOE sent a Notice of Scoping postcard to 75 stakeholders, including local, State, and Federal government agencies, American Indian governments, natural resources agencies, landowners, and other interested individuals and organizations, and held a public meeting in the City of Green Bay on April 12, 2011.

The Draft EA was subsequently released for a public comment period from August 3 to September 3, 2011. Post cards announcing the availability of the Draft EA were sent to all those individuals and agencies on the document's distribution list (Appendix A of the Draft EA). Also, a Notice of Availability was published in the local newspaper and posted on the DOE Golden Field Office website along with the Draft EA.

This Appendix summarizes the many comments DOE received either by correspondence (primarily emails) or verbally at the public meeting during the scoping period and by correspondence (emails and letters) during the Draft EA public comment period. Because of the large number of, and often extensive, comments received, short summary statements capturing the principal concerns or issues were developed and arranged in topical categories or bins. The topical bins used are as follows:

- | | |
|-------------------------------------|-----------------------------------|
| 1) NEPA Process | 12) Environmental Justice |
| 2) Environmental – General | 13) Geology and Soils |
| 3) Project Funding/Financials | 14) Health and Safety |
| 4) Project Description | 15) Land Use |
| 5) Project Viability | 16) Noise |
| 6) Project Selection and Approval | 17) Socioeconomics |
| 7) Technology | 18) Transportation |
| 8) Facility Operations | 19) Utilities and Energy |
| 9) Air Quality | 20) Waste and Hazardous Materials |
| 10) Aesthetics and Visual Resources | 21) Water Resources |
| 11) Biological Resources | 22) Appendix D White Paper |

This appendix contains a table of comment summaries for each of the above topics. Also contained in each table are numbers (in the case of scoping comments) or letters (in the case of Draft EA comments) that link the comment to a specific comment document or documents. Key Table 1 on the next page identifies, by an assigned number, the individual scoping comment documents by the person or group that submitted them. Key Table 2 on the subsequent page identifies, by an assigned letter, the specific comment documents received during the Draft EA comment period by the person or group that submitted them. In addition to the summary comments, topical Tables C-1 through C-22 include “Scoping Commenters” and “Draft EA Commenters” columns showing the numbers or letters that link the comments to the commenters. In many instances, the scoping comments were also identified as comments on the

Draft EA and are shown with links in both columns. Comments with no number entries under the “Scoping Commenters” represent new topics identified as comments on the Draft EA.

In the case of the scoping comments, multiple submittals from a single individual were grouped under a single number. For example, Key Table 1 shows multiple comment documents for commenter number “2.” Comment summaries showing number “2” can be linked to one or more of the three comment documents shown in the table for commenter number 2. The format of Tables C-1 through C-22 allowed DOE to review the information in the topical groupings and not only identify the important issues, but get a feel for the number of commenters that might hold similar feelings.

Key Table 1 – Scoping commenter number designations used in comment summary tables

1	Banaszak, Don – member of the public – scoping comments – 5-12-11
2	Berggren, John, PE – member of the public – scoping comments – 4-11-11 letter submitted at scoping meeting
	Berggren, John, PE – member of the public – scoping comments – 4-26-11
	Berggren, John, PE – member of the public – scoping comments – 5-10-11
3	Blaylock, Joseph & Lorrie – members of the public – scoping comments – 4-8-11
4	Blakley – EPA, Region 5 – January 25, 2011 letter, turned in at scoping meeting
5	Brown-Schaible, Karen – member of the public – scoping comments – April 12, 2011 letter submitted at scoping mtg
6	Chaudoir, Joanne – member of the public – scoping comments – April 12, 2011 letter submitted at scoping mtg.
	Chaudoir, Joanne – member of the public – scoping comments – 4-30-11 (basically same as above)
	Chaudoir, Joanne – member of the public – scoping comments – 5-7-11
	Chaudoir, Joanne – member of the public – scoping comments – 5-10-11
	Chaudoir, Joanne – member of the public – scoping comments – 5-10-11(2)
	Chaudoir, Joanne – member of the public – scoping comments – 5-12-11
	Chaudoir, Joanne – member of the public – scoping comments – 5-12-11(2)
Chaudoir, Joanne – member of the public – scoping comments – 5-15-11	
7	Dorff, Ned – Green Bay Alderman – scoping comments – note submitted at scoping mtg
8	Erickson, Bernie – Brown County Supervisor, District 7 – note submitted at scoping mtg
9	Filcher, John – Incinerator Free Brown County – scoping comments – 4-10-11
	Filcher, John – Incinerator Free Brown County – scoping comments – April 12, 2011 letter submitted at scoping mtg
10	Flowers, Diana – Alternative Investment Management, LLC – scoping comments (Oneida comments) – 5-9-11
	Flowers, Diana – Alternative Investment Management, LLC – scoping comments (Oneida comments) – 5-11-11
11	Greenaction for Health and Environmental Justice – interest group – March 7, 2011 comments submitted at scoping mtg
12	Greenfield, Jan – Neighbors Against the Burner – scoping comments – 4-10-11
13	Grzezinski, Dennis – Midwest Environmental Advocates – scoping comments – 5-13-11
14	Krieg, Rich – member of the public – scoping comments – 4-12-11 comment form submitted at scoping mtg.
15	Lemoine, Charlene – Waukesha County Environmental Action League (WEAL) – scoping comments – 5-12-11
16	Lindstrom, Daniel – City of Green Bay – scoping comments – 4-12-11 comment form submitted at scoping mtg.
17	Linzmeyer, Paul – Sustainable Green Bay – scoping comments – February 18, 2011 letter submitted at scoping mtg.
18	Mahjoob, Latif – American Combustion Technology – air emission information submitted at scoping mtg
19	Miller, Joseph, PhD – Physicians for Social Responsibility – scoping comments – 5-13-11
20	Pfeifer, Marcy – member of the public – scoping comments – 4-12-11 letter submitted at scoping mtg. (same as 4-13)
	Pfeifer, Marcy – member of the public – scoping comments – 4-13-11
	Pfeifer, Marcy – member of the public – scoping comments – 4-23-11
	Pfeifer, Marcy – member of the public – scoping comments – 4-28-11
	Pfeifer, Marcy – member of the public – scoping comments – 4-29-11
	Pfeifer, Marcy – member of the public – scoping comments – 4-29-11(2) (same as 4-13-11)
Pfeifer, Marcy – member of the public – scoping comments – 5-13-11	
21	Runge, Troy – Wisconsin Bioenergy Initiative – March 1, 2011 letter submitted at scoping mtg.
22	Saff, Ron, MD – member of the public – scoping comments – 4-10-11
23	Severson, Glen & Donna – members of the public – scoping comments – 4-9-11
24	Uram, Eric – Sierra Club – extension request – 4-15-11
25	Werner, Shahla, PhD – Sierra Club – scoping comments – 5-10-11
26	Williams, Scott – reporter – questions on NEPA process – 4-8-11
27	Transcript of comments at Green Bay Scoping Meeting of April 12, 2011

Key Table 2 – Draft EA commenter letter designations used in comment summary tables

a	Acker, William – member of the public – Draft EA comments – 8-10-11
b	Banasazk, Florence – member of the public – Draft EA comments – 9-1-11
c	Blaylock, Joseph and Lorrie – members of the public – Draft EA comments – 8-14-11
d	Chaudoir, Joanne – Incinerator Free Brown County – Draft EA comments – 8-27-11
e	Cristaldi, (name could be wrong) – member of the public – Draft EA comments – 8-8-11
f	Diaz, Kim – Helfenstein Soup Council, Inc. – Draft EA comments – 9-3-11
g	Finco, Susan – petition signatures in favor of Oneida project – 8-12-11
h	Finco, Susan – letters in favor of Oneida project – 8-12-11
i	Grezezinski, Dennis – Midwest Environmental Advocates – Draft EA comments – 9-3-11
j	Hoegger, Dean – member of the public – Draft EA comments – 9-3-11
k	Incinerator Free Brown County (IFBC) – Draft EA comments – 8-31-11
l	Jones, Shirley – member of the public – Draft EA comments – 8-15-11
m	Jones, Shirley – Citizens for a Healthy and Safe Environment (CHASE) – Draft EA comments – 8-20-11
n	Lemoine, Charlene – Waukesha County Environmental Action League (WEAL) – Draft Ea comments – 9-2-11
o	Mau, Jim – member of the public – Draft EA comments – 8-5-11
p	Mercier, Christina – member of the public – Draft EA comments – 8-11-11
q	Mulloy, Maureen – member of the public – Draft EA comments – 8-27-11
r	Olgren, Lisa – member of the public – Draft EA comments – 9-2-11
s	Patenaude, Robert and Mary – members of the public – Draft EA comments – 8-10-11
t	Pfeifer, Marcy – member of the public – Draft EA comments – 8-4-11
u	Pfeifer, Marcy – member of the public – Draft EA comments – 9-2-11
v	Reindl, John – Sierra Club, John Muir Chapter – Draft EA comments – 8-3-11
w	Willman, Elaine – Village of Hobart – Draft EA comments – 9-1-11
x	Wilson, Monica – Global Alliance for Incinerator Alternatives (GAIA) – Draft EA comments – 9-2-11

Summarized Comment	Applicable Comment Set	
	Scoping Commenters	Draft EA Commenters
1. An EIS should be done.	2, 6, 13, 15, 19, 27	b, c, d, f, i, j, n, p, q, r, t, u, w, x
2. Request for an extension on scoping comment period	9, 24	
3. Draft EA does not take a hard look at impacts of proposed action and reasonable alternatives		i, n, v
4. Draft EA does not evaluate comparable facilities		i
5. Draft EA is inadequate to support EIS determination		v
6. EA needs to be redone when feedstock is better defined (contracts in place)		v
7. EA needs to be redone when Detailed Recycling Plan has been completed and approved (believe this is the Materials Separation Plan specified in the draft air permit)		v
8. Question whether Oneida's presentation of project to DOE and Brown County before the Draft EA comment period presents conflict of interest under State and Federal law		k

Summarized Comment	Applicable Comment Set	
	Scoping Commenters	Draft EA Commenters
1. Lack of environmental impact studies and historical evidence in US to determine safety and impact to environment	1, 2, 6	w
2. Concern over fate of toxins	2	
3. Has Oneida applied for all necessary Clean Air Act permits	9, 20	
4. Concerned that there is no identified agency currently guaranteeing oversight and enforcement of Clean Air Act and Clean Water Act violations on the site	27	

Summarized Comment	Applicable Comment Set	
	Scoping Commenters	Draft EA Commenters
1. Wants to see details of funding and financial assurance - will repayment be made if project fails, what are the loan interest rates - would loans and subsidies be transferred if facility sold or ownership is transferred	15	k, n, r, v
2. Questions if Oneida would be eligible for additional funding if the project is expanded	15	
3. Concern whether project would be built without stimulus money and whether Oneida has anything to lose because of the Federal funding	6	b, n, r
4. Concern about economic losses to Brown County Port and Solid Waste from diversion of solid waste and recycling materials	9, 27	c, f, k, n, r, u, v, w
5. Project being proposed by a for-profit corporation showing an expectation of being economically sustainable, creating jobs, and extending the life of the Brown County landfill	17, 27	
6. The State should require "complete and full waivers of any perceived or actual tribal sovereign immunity"		c
7. Concern that this project might fail as have other government supported enterprises and want to know if Oneida principals have connections to current federal administration		k

Summarized Comment	Applicable Comment Set	
	Scoping Commenters	Draft EA Commenters
1. Questions whether this is a prototype facility with associated unknowns as to potential impact to health and the environment and has concern over contradictory information put out by Oneida in this regard	6, 9, 11, 15, 27	b, d, f, j, r, w, x
2. Concern over unsubstantiated or contradictory information being put out, including the number of pyrolysis gasification facilities in the US or the world, efficiency of thermal oxidizer, ability to meet EPA and California air standards, amount of residues, hours of operation, amount of waste processed.	6, 9, 11, 15, 19, 25	c, d, j, r
3. Concern over contradictory information on whether the proposed facility is modeled after the IES plant in Romoland, CA and that the Romoland facility had harmful emission levels and other problems	5, 6, 9, 11, 27	
4. Questions whether the proposed facility would be considered incineration or "green energy"	6, 9, 11, 15, 27	d, j
5. Questions whether this can be considered a recycling facility, and if Wisconsin has a recycling law wouldn't it be a violation for facility to take recyclables	6, 11, 13, 15, 25	i, u
6. Questions whether facility can rightly be considered as producing renewable energy. Contends Wisconsin statutes do not deem incineration of solid waste for energy recovery as renewable energy.	6, 11, 13, 14, 20, 22, 25, 27	d, u
7. Questions discrepancies on how much power the plant would produce - 5 MW or 6.4 MW	6, 9, 11	
8. Questions why project description includes language implying DOE's endorsement and, if so, what is such an endorsement based on	13, 15	
9. Confusion over whether this facility is a MSW combustor, a renewable energy facility, or a SW facility.	20	
10. Concern about whether facility is already being designed for more than 3 pyrolysis units - i.e., 300 tons per day	4, 9, 20	
11. Concern that activity at the old Ashwaubenon site on Packerland Drive may be the pyrolysis facility being moved back	20	
12. The EA needs to provide real data on other, similar facilities, if they exist, as to emissions, management of waste, materials recycled, power produced, etc., so the decision makers and public can evaluate the potential impacts	13	
13. Concern about the gas that would be produced by the facility, what it consists of, and where it would go	27	
14. Concern over name change to Broadway Manufacturing, LLC as another example of project inconsistencies	27	
15. Concern that identification as a recycling facility would hurt real recycling programs because people will stop segregating, thinking everything can go in the trash – OSGC name change to Oneida Recycling Solutions is part of this issue		k, n, u

Summarized Comment	Applicable Comment Set	
	Scoping Commenters	Draft EA Commenters
1. Questions viability of the technology based on cited failures in other countries, including Germany, Australia, Malaysia, and Japan.	6, 9, 11, 20, 27	b, d, x
2. Who would be responsible for clean-up were the facility to shut-down?	6, 9, 27	c, r
3. Studies show cost of generating energy from solid waste is too high and why municipal subsidies are required.	6, 12, 13, 14, 20, 23	

Summarized Comment	Applicable Comment Set	
	Scoping Commenters	Draft EA Commenters
4. Concern that a detailed economic analysis would show the project is not visible – citing costs of facility and work force compared to tipping fees and energy sale, just don't add up.	25, 27	r
5. Believe "Precautionary Principle" applies – e.g., the project proponent has the burden of proof to show the facility is not harmful since there is a lack of scientific information	6	
6. Concern over project being "first system of its kind"	9	
7. In favor of project, believes it will demonstrate viability of creating energy from unrecyclable portions of municipal waste, and believes it will be viable considering both economic and energy returns	21, 27	
8. In favor of project – have observed pilot tests and believe technology is viable – technically and mechanically sound	27	

Summarized Comment	Applicable Comment Set	
	Scoping Commenters	Draft EA Commenters
1. Questions how community approval was obtained before the process started.	6	
2. Questions value of waste to energy projects. If waste-to-energy facilities have value, why are there so many groups and experts opposed to them?	6, 11, 12, 14, 20	d, e, f, l, m, x
3. Questions value of project's small power production compared to economy and health risks	6	n, r
4. Questions Oneida selection of this project rather than large recycling plant employing many as was proposed to them.	6	e
5. Questions burning resources rather than recycling them and whether this is consistent with Wisconsin statutes allow	6, 13, 15, 19, 25	d
6. Federal funding should be going to "zero waste" programs rather than waste to energy	12, 13, 14, 19, 27	b, f, i, l, x
7. Other alternatives such as anaerobic digestion, smart grid, fuel cell, geothermal, kinetic energy, solar, and wind projects represent better alternatives.	12, 13, 15, 27	d, f, i, l, n, v
8. Against project because it would compete with wind and solar for renewable energy credits and have negative impacts on waste reduction, recycling and composting	15, 23	d, x
9. Recommend DOE not authorize funding.	19	x
10. Recommend the project not be used as a model for tribes and municipalities for the management of SW or the production of electricity	19	
11. Relying on DOE, DNR, and EPA to review and verify the science behind this process and that it is not dangerous to human health	7, 27	b, c, d, t
12. Urge DOE to approve the Oneida project – in favor of new technology to reduce landfill use and generate electrical power	8	
13. Questions if DOE will withhold funding until City of Green Bay holds required public hearing for a Conditional Use Permit, which it failed to hold	9, 27	
14. Wants to know specific locations of other sites considered; what level of analysis was conducted and why it was rejected; and the process and professionals that made the decision	9	
15. Supports the project	17, 27	
16. In favor of the project as long as its shown to be safe and friendly to the environment	27	

Summarized Comment	Applicable Comment Set	
	Scoping Commenters	Draft EA Commenters
17. Questions why the facility isn't being constructed in Ashwaubenon or on tribal lands	27	c
18. Questions why this project is being "fast tracked" for approval by Green Bay	27	
19. Conditional Use Permit done according to statutes – documentation is available	16	
20. Project does not meet goals for funding identified in the Draft EA for DOE, BIA and Wisconsin		x

Summarized Comment	Applicable Comment Set	
	Scoping Commenters	Draft EA Commenters
1. Questions if claims of technology being closed loop are false and if they are being made because absence of oxygen prevents formation of dioxins, furans, etc.	6, 9, 11, 25, 27	d
2. Details of the processing technology are needed to appropriately evaluate the project	25	
3. Concern that more efficient pollution controls simply pass toxins to filter water, scrubber water, fly ash and bottom ash.	6	
4. Questions claims of combustion in absence of oxygen – waste streams already contain oxygen	9, 11	d
5. Questions claims of complete destruction of all pollutants made by equipment manufacturer		
6. Questions whether technology can actually produce power since there are no successful examples	11	x
7. Pyrolysis is an environmentally sound way of disposing of solid waste and producing energy	17, 27	
8. Questions claims of waste volume reduction – if all discharge streams, including air emissions, are added, the amount of waste is larger than in the beginning	27	
9. Believes technology is energy inefficient and would like to see an energy balance that shows how much energy it takes to raise the temperature to create the energy	27	
10. The Draft EA provides insufficient specifics on the pyrolysis equipment/technology and examples of other places it has been used		v
11. The EA needs to detail conversion efficiency of pyrolysis units, engines, and generators, once feedstock has been secured and characterized/analyzed		v

Summarized Comment	Applicable Comment Set	
	Scoping Commenters	Draft EA Commenters
1. Concern over facility being in operation long enough to substantiate funding (longevity history in other countries is poor)	1	
2. Concern over designer, builders, and owners lack of experience with this type of potentially hazardous process.	2, 6, 9, 11, 20, 27	c
3. Questions contradictory statements on operations schedule of facility and if operating only 5 days per week wouldn't start up and cool down be hard on the equipment	6, 25	

Summarized Comment	Applicable Comment Set	
	Scoping Commenters	Draft EA Commenters
4. Questions information indicting that Oneida plans to pursue used tires as a primary fuel source – issues with storage, fires, adding to landfills where they currently cannot go, etc.	5, 9, 13, 15, 20	f, k
5. Questions if public will have input on operational plans such as changes in feedstock, hours of operation, and other modifications	15	
6. What are the characteristics of the waste that would go into the pyrolysis process.	20	f, k
7. A precise characterization of the feedstock is needed to evaluate the impacts of the facility.	5, 9, 13, 25, 27	k
8. Questions if waste can legally be stored over the weekend (since receipt only occurs on week days)	25	
9. Believes facility's receipt of magazines, newspaper, corrugated cardboard and office paper would be against State regulations	13, 25	
10. How will the process handle the constantly varying heat value in the incoming waste? And how will regulatory agencies ever get a true indication of the toxins that could be involved since the waste varies.	6	
11. Concern that a not yet defined portion of Green Bay's regulations for solid waste disposal facilities would allow gasification of hazardous waste, medical waste, and industrial waste	9, 27	
12. Disagree with Draft EA describing waste contracts as needing to wait until permits are in place – how will public and regulators know what is to be processed before the contracts are in place		d, k, n, r
13. Questions why there is a conflict in the hours of operation between the EA and the information submitted to DNR, which says 24 hr/day, 5 days/wk		k
14. Would like to see information such as a staffing plan – doesn't believe 22 to 30 people can support a 24/7 operation		r
15. Believe the EA's estimate of the amount of waste (5.8%) the facility would potentially recycle is more than identified in the referenced DNR report and that there would likely be little interest in the types of materials removed		v
16. Don't believe recycling claims/plans – there would be no clean paper and cardboard after shredding – there would be little impetus for the operator to remove materials with Btu content		k, x

Summarized Comment	Applicable Comment Set	
	Scoping Commenters	Draft EA Commenters
1. Concern that it would involve hazardous air emissions with serious health and environmental concerns – dioxin and mercury are examples of specific concerns	1, 5, 6, 9, 11, 12, 13, 14, 19, 20, 22, 23, 25, 27	d, f, i, j, l, p, r, s, t, u, w, x
2. Don't believe owners touting of no smoke stacks.	2, 6, 23, 27	d
3. Concern over impact to the already poor air quality in the Green Bay area. (citing May 9, 2011 article in Green Bay Press Gazette identifying GB as 23 rd among 277 US metropolitan areas in terms of short-term particle pollution)	2, 5, 6, 9, 23, 27	b, d, r, s, w
4. Concern that air emissions from these type facilities lead to acid rain, smog, and ozone	6	u
5. Questions whether emission estimates are verifiable due to lack of technology history – would like to see examples of emissions from others	6, 13, 15	b, f, k, x

Table C-9. Air Quality		
Summarized Comment	Applicable Comment Set	
	Scoping Commenters	Draft EA Commenters
6. Concern over impacts of fine particulates on people and wildlife and on lack of tests to detect them	6, 13, 19, 20, 22, 23, 25, 27	d, v, u, w
7. Concern that facility will add to global warming (GHG emissions) and one asked if it could create a microclimate	6, 25	
8. How and how often would emissions be monitored and what type of emissions control equipment would be included	13, 15	
9. Provide potential to emit of all Clean Air Act pollutants, including start-up and shut-down actions	4, 9, 20	
10. Concern that toxins will reach environment and food chain, such as dairy products after animals graze on contaminated fields	5, 6, 9	
11. Concern over EPA regulations and the 3-year delay to address incinerators	6	
12. In favor of project, believes air emissions will be less than coal-fired power plants in the region and that air permit process will ensure suitably low air emissions	21	
13. In favor of project, have since testing and witnessed clean air coming out	27	
14. In the Draft EA the quantity of Btu's considered in the GHG emissions seems too low compared to the volume of waste to be processed		a
15. Don't believe the project should be allowed if DOE (?) has granted a 3-year deferral period to determine if CO2 emissions are worth the benefits of the energy created		f
16. Disagree with use of "rural" coefficients in the air quality modeling.		f
17. The Draft EA does not adequately address current air quality conditions, including the frequency of poor air quality warnings		f
18. Concerned about the formaldehyde and acetaldehyde emissions described in the Draft EA		f, p, r
19. Concerned that New Source Performance Standards were not used to address emissions from the flare and that 2010 standards would be exceeded by SO2 and NO2 emissions		f, i
20. The Draft EA failed to take a hard look at the fate and transport of metals released to the air		i
21. The EA should provide detailed emission limits and monitoring requirements that would be imposed on the facility		i
22. Want specifics of testing (technology/equipment and feedstock) that was done to generate air emissions factors used in the air permitting process, including entities involved and regulatory agencies sanctioning the testing		k, v
23. Concerned that smoke detectors reaching the pyrolysis units would result in releases of radioactivity		o
24. GHG calculations are based on maximum electrical use and production and is not realistic		v
25. GHG calculations do not take into consideration the impacts to the Winnebago landfill gas/electricity production as a result of the diversion of waste and needs to be updated to do so		v
26. GHG calculations don't consider benefits of recycling and composting that would be reduced by the project		x
27. Identify the statutory and regulatory provisions that allow DOE to rely on the testing estimates of air emissions used for this project		k
28. Want to know why DNR's Preliminary Determination (for air permit) is so different in air emission descriptions than the Oneida Plan of Operations		k

Summarized Comment	Applicable Comment Set	
	Scoping Commenters	Draft EA Commenters
1. Concern about aesthetics of the facility and how people in the area will feel about it and if property value will decrease	6	
2. Concern about odor that would be produced from the facility, including need to stockpile waste (since only receiving 5 days per week)	5, 6, 9	
3. Questions facility lighting and its impacts	6, 9	
4. Based on seeing building plans, believes the facility will be aesthetically pleasing	27	

Summarized Comment	Applicable Comment Set	
	Scoping Commenters	Draft EA Commenters
1. Concern for impacts of wildlife from noise and air emissions, including birds around lake and river and in the Wildlife Sanctuary 2 or 3 miles away	6, 27	

Summarized Comment	Applicable Comment Set	
	Scoping Commenters	Draft EA Commenters
1. Questions Federal policy of supporting/ promoting waste management activities with Native Indians often resulting in toxic processes and landfills on Indian lands – actions that would be less welcome in more affluent communities	20	f, l, m
2. Concern of project being located in predominantly low income or minority neighborhood and having disproportionately adverse effects	9, 27	

Summarized Comment	Applicable Comment Set	
	Scoping Commenters	Draft EA Commenters
1. How will soils be affected by the facility – this is an agricultural state	6	
2. Concern over whether there are site elevations or slopes that could be unstable or result in erosion, or if there are other soil issues	9	
3. Concern over seismic hazards or faults/fractures or other hazards associated with the terrain	9	

Summarized Comment	Applicable Comment Set	
	Scoping Commenters	Draft EA Commenters
1. Concern for safety of operations and potential for accidents, including potential for heating chamber rupture and release of toxins, explosions, and fires.	2, 6, 9, 27	b, r, x
2. Believe the project would be unhealthy for the community	3, 20	d, l, w, x
3. Concern for long-term health impacts and who will be monitoring for such impacts.	6	
4. Questions what type of training and safeguards will be required by DOE?	20	k

Summarized Comment	Applicable Comment Set	
	Scoping Commenters	Draft EA Commenters
5. Are there appropriate public safety and emergency response plans, including responses to flooding	9	r
6. Questions whether equipment would be manufactured to meet all U.S. codes		r

Summarized Comment	Applicable Comment Set	
	Scoping Commenters	Draft EA Commenters
1. Concern of whether city's compost pile is adjacent to site and if it could become contaminated from toxic emissions and ash.	6	
2. What is the proximity of the project site to schools (public or private), daycare centers or nursery schools, other children's play areas, nursing homes, or elderly or low income, hospitals, etc.?	9, 20, 27	f
3. Concern for health affects to nearby transportation routes, recreation areas	9, 20, 27	
4. Are there critical habitat areas, state or local natural areas, or historic, scientific, or archaeological areas on the proposed site?	20	
5. Are there remediation sites (e.g., NPL sites) or other contaminated sites at or near the project site, including landfills, USTs, or other unresolved hazardous material issues	9	
6. Were there unique past uses of the site that could affect or be affected by the project?	9	
7. Is the project compatible with existing land use?	9	f
8. The site is in an industrial area so that impacts to quality of life is minimized	17, 27	
9. Development of the site would restore some of the value of this potentially contaminated site	17	
10. If Oneida is buying the land, would they be stuck with eventual cleanup of already contaminated site (from dredge spoils)?		f

Summarized Comment	Applicable Comment Set	
	Scoping Commenters	Draft EA Commenters
1. Contradictory information has been put out on the amount of noise that would be produced – Oneida says no noise due to heavy insulation, ACTI says sound would be like 3 jet engines but it would go straight up.	6, 27	
2. Concern on how much noise would be produced and its impacts to people and wildlife.	6	
3. What are noise sources in the area, what are the noise contours for the project, and what procedures or guidelines are in place that would allow neighbors to formally complain	9	

Summarized Comment	Applicable Comment Set	
	Scoping Commenters	Draft EA Commenters
1. Only a small number of jobs would be created	6, 27	b, f, u
2. Believe the project would be economically unwise.	3	
3. Project would adversely impact existing and future recycling and composting activities and recycling sustains 10 times more jobs per tonnage than does incineration and landfilling		x

Summarized Comment	Applicable Comment Set	
	Scoping Commenters	Draft EA Commenters
1. Concern over need for Traffic Study with traffic counts and impacts to neighborhoods.	2, 9, 27	
2. Concern for hazardous materials moving in and out of facility, routes they will travel, and how spills would be handled.	2, 9, 20, 27	f
3. Concern for wear and tear on the roads cause by garbage trucks and who will pay	6	
4. Concern for garbage blowing off of trucks	6	
5. Concern over actual number of truck deliveries per day – believes there have been mis-representations	9	
6. Concern over the mitigation measures that might be needed to reduce traffic impacts, including biking and pedestrian pathways	9	

Summarized Comment	Applicable Comment Set	
	Scoping Commenters	Draft EA Commenters
1. How much energy will the facility require and if the pyrolysis process has problems what is the back-up for energy	13, 15	
2. Would renewable energy credits be applied to all energy produced, or just that sold to utilities?	13, 15	
3. Is there adequate water supply available such that other users in the area would not be affected	9	
4. Is municipal sewer system available, is capacity available, and will treatment capabilities be adversely affected	9	
5. The Draft EA does not provide enough information on how much electricity would be used by the facility and what portion, for what periods of time, of the electricity would go to the grid		i

Summarized Comment	Applicable Comment Set	
	Scoping Commenters	Draft EA Commenters
1. Concern for disposal of hazardous waste (HW) end product and if cost has been included in project	1, 2, 6, 9, 13, 15, 27	u
2. Questions use of char or ash as road base or concrete additive; that is, being inert and non-hazardous – based on what examples	6, 9, 13, 15, 25	

Summarized Comment	Applicable Comment Set	
	Scoping Commenters	Draft EA Commenters
3. Questions how and how often char and ash would be tested and how it will be disposed if HW and how it will be disposed if not HW	13, 15	
4. How and where will pyrolysis waste be disposed of? And if tires are involved wouldn't it have to go to a special landfill? Who will oversee proper disposal?	6, 20, 25	f
5. Concern that ash going to a landfill will blow around. (And asked if the technology expert at the "Open House" indicated the ash would be put into sealed containers.)	6, 27	x
6. The project cannot claim reduction of waste volume going to landfill if waste is originally banned from landfilling	13	
7. Need a full inventory of hazardous materials and applicable safety precautions	9, 27	
8. Question whether materials removed in the process would be recyclable after being mixed with (and dirtied by) the MSW		f, n
9. The Draft EA failed to take a hard look at the fate and transport of metals that would stay in waste residues		i

Summarized Comment	Applicable Comment Set	
	Scoping Commenters	Draft EA Commenters
1. Concern about composition of storm water discharges.	2, 9, 27	
2. Questions how Bay and Fox River water will be protected from toxins.	5, 6, 9, 13, 27	f, i, u
3. Concern whether there would be erosion from construction or operations	6	
4. Concern about whether wetlands would be impacted	6, 9	
5. Questions how much water would be needed to support the process, how much would be recirculated and where wastewater would go	13, 15	
6. Concern about the toxic materials that could be in the facilities wastewater	13, 20, 27	
7. Concern of whether groundwater could be affected	6, 9, 27	
8. What monitoring and testing would be done on the wastewater discharges?	13	
9. Concern whether the project site is within coastal barrier resource area or if there are drainages, streams, rivers, or coastlines near	9	
10. Is the project site is within a floodplain	9	
11. Concern over whether the watershed could be impacted	27	
12. The Draft EA makes little mention of how much water would be used and how wastewater would be managed		f
13. Concerned about impacts of rising water levels due to climate change and the project's impact on those waters		f
14. The Draft EA failed to take a hard look at the fate and transport of metals released in wastewater		i

Summarized Comment	Applicable Comment Set	
	Scoping Commenters	Draft EA Commenters
1. The cited reference for the Denmark discussion does not mention pyrolysis and there are no Denmark facilities included in the table		v
2. The Appendix D table entry for Cleveland Power appears wrong as there is no such plant		n, v

Table C-22. Appendix D: White Paper – Pyrolysis Overview/Background		
Summarized Comment	Applicable Comment Set	
	Scoping Commenters	Draft EA Commenters
3. Question the entries for the German plants as the commenter could not find reference to them		v
4. The Appendix D table lacks any detail on specific technology and operating process		n, v
5. Appendix D needs to be redone with documentation that can be used for confirmation		v