



Oneida Seven Generations Corporation

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MYTHS VS. FACTS

There is considerable misinformation circulating about the Oneida Seven Generations Corporation (OSGC) Renewable Energy Facility. It's intended to scare and mislead people. We live here too and would not undertake a project that would be harmful to people or the environment.

It's important to have a thorough understand of what the project is and isn't. We hope you will find the following information helpful as you learn more about the facility. We have grouped the myths and responses to make it easier to find answers to your questions.

PUBLIC HEALTH AND SAFETY	
<p><u>Myth:</u></p> <p>Government agencies say this technology is a health and environmental hazard; this facility poses risks to our health and the environment.</p>	<p><u>Fact:</u> <i>This statement is false and unsupported.</i></p> <p>According to the U.S. Environmental Protection Agency (EPA), waste-to-energy (WTE) is a "clean, reliable, renewable source of energy." In addition, the EPA says the facilities produce electricity with "less environmental impact than almost any other source of electricity."</p> <p>America's WTE facilities today meet some of the most stringent environmental standards in the world and employ the most advanced emissions control equipment available.</p> <p>Source: http://wte.org/faq</p>
<p><u>Myth:</u></p> <p>The emissions will affect 10 to 40 miles surrounding the facility in the air, water, soil and food chain; creating a fallout zone.</p>	<p><u>Fact:</u> <i>This statement is false and unsupported.</i></p> <p>Modern waste-to-energy facilities must meet or exceed EPA's Maximum Achievable Control Technology (MACT) standards. They are not allowed to operate unless they meet or exceed these standards. There is no "fallout zone."</p> <p>Sources:</p> <ol style="list-style-type: none"> 1. http://wte.org/faq 2. http://www.energyrecoverycouncil.org/userfiles/file/2007_EPAemissions_memo.pdf
<p><u>Myth</u></p> <p>Particulate fly ash will be produced which contains dioxins, toxins and other materials.</p>	<p><u>Fact:</u> <i>This statement is false and meant as a scare tactic.</i></p> <p>A byproduct called carbon ash (not toxic ash) will be produced. The byproduct is completely inert and the remainder can be, and is, used in numerous industries.</p>

<p><u>Myth:</u></p> <p>Companies claim their technology is zero emissions or pollution free. However, all of the technologies emit dioxins and other harmful pollutants into the air, soil and water.</p>	<p><u>Fact:</u> <i>This is a false and misleading statement.</i></p> <p>Recent research and study provides valuable information about the impact. WTE facilities of this type are also known as Conversion Technologies in the State of California. Los Angeles County analyzed dioxin/furan data from four conversion processes. Their research showed that these conversion technologies have no issues complying with U.S. EPA regulations. “In fact, these conversion technologies have been shown in actual operation to produce dioxins and furans in amounts <u>dramatically lower than the already low U.S. EPA limits</u>, far less than many commonplace and natural activities such as a wood burning fireplace, and well within safe guidelines.”</p> <p>Source: http://www.socalconversion.org/pdfs/Conversion_Technology_Environmental_Factsheet.pdf</p> <p>Emissions from Thermochemical Conversion Technologies, including Pyrolysis and Gasification in comparison to EPA, European Commission and Japanese Standards are reported at: http://www.bioenergyproducers.org/documents/ucr_emissions_report.pdf (pages 21-32)</p>
<p><u>Myth</u></p> <p>Waste-to-energy facilities are a significant source of both air emissions and toxic wastes containing dioxin, mercury, lead and other harmful substances</p>	<p><u>Fact:</u> <i>This is false and meant as a scare tactic.</i></p> <p>Modern waste-to-energy facilities meet or exceed EPA’s Maximum Achievable Control Technology (MACT) standards. America’s waste-to-energy facilities spent \$1 billion to retrofit pollution control equipment to achieve the strictest federal standards. “The performance of the MACT retrofits has been outstanding,” according to the U.S. EPA. “Upgrading of the emissions control system of large combustors to exceed the requirements of the Clean Air Act Section 129 standards is an impressive accomplishment.” New facilities (such as this one) must meet or exceed MACT.</p> <p>Source: http://wte.org/faq</p>
<p><u>Myth:</u></p> <p>The facility will generate toxic ash (one ton of ash for every four tons of waste).</p>	<p><u>Fact:</u> <i>This is false and meant as a scare tactic.</i></p> <p>The fact is, for every 10 tons of waste, one ton of a byproduct called carbon ash (not toxic ash) will be produced. The byproduct is completely inert and the remainder can be used in numerous industries.</p>

<p><u>Myth:</u></p> <p>The ash from waste-to-energy plants is not safe.</p>	<p><u>Fact:</u> <i>This is false.</i></p> <p>Waste-to-energy carbon ash safe and completely inert. Ash residue from waste-to-energy facilities is tested in accordance with strict state and federal leaching tests and has been consistently shown to be safe for land disposal and / or reuse. All ash from this facility will be handled and shipped in an enclosed environment.</p> <p>Source: http://wte.org/faq#ash</p>
<p><u>Myth</u></p> <p>Leaching of toxic metals cadmium, lead, and mercury occurs more rapidly at low pH, and contaminates groundwater.</p>	<p><u>Fact:</u> <i>This is false and misleading.</i></p> <p>The proposed Pyrolysis System is a completely closed loop system so all gases and wastewater are contained. Typical MSW contains 17% moisture. Any moisture that enters the gasifier will come off as a vapor mixed with the gases; the vapor then condenses during the gas cleanup. Water will be treated and filtered, with a portion of the water used in the gas cleanup process and the remained filtered to a level that it can be disposed in a public sewer, just like dish, shower and sink water.</p>
<p><u>Myth:</u></p> <p>Rats and carrion birds are attracted to the trash burned in this incineration and gasification facility.</p>	<p><u>Fact:</u> <i>This is false.</i></p> <p>This facility is <u>not an incinerator</u>. In contrast to landfills, the OSGC facility will be an entirely closed loop facility; no garbage will be lying around in storage yards or on the ground. All operations take place inside a closed building; therefore, no rats or birds will be attracted to the location.</p>
<p><u>Myth:</u></p> <p>The process produces toxic air emissions.</p>	<p><u>Fact:</u> <i>This is false.</i></p> <p>Los Angeles County analyzed dioxin/furan data from the four conversion processes currently under consideration in our process. Our research and review of emissions test results reveals that these conversion technologies have no issues complying with U.S. EPA regulations.</p> <p>In fact, these conversion technologies have been shown in actual operation to produce dioxins and furans in amounts dramatically lower than the already low U.S. EPA limits, far less than many commonplace and natural activities such as a wood burning fireplace, and well within safe guidelines. <i>(continued next page)</i></p>

Air Emissions Comparison of Dioxin/Furan Regulation

<u>Regulatory Limits</u>	<u>Dioxin/Furan</u>
US EPA Limits (for new sources)	0.000000001617131
<u>Actual Facility Emissions</u>	
International Environmental Solutions	0.000000000014174
Entech Environmental	0.000000000087715
Interstate Waste Technologies	0.000000000000081
Arrow Ecology and Engineering	This biological process does not produce dioxins or furans.

(All limits normalized to lbs dioxins/furans per ton municipal solid waste)

Air Emissions Comparison of Equivalent-Sized Coal and Conversion Technology Facility

Pollutant	10 MW Coal Plant	10 MW IES Conversion Technology Facility
Sulfur Dioxide	400,000	230
Nitrogen Oxide	408,000	76,755
Carbon Dioxide	148,000,000	49,033,364
Small Particles	20,000	1,701
Hydrocarbons	8,800	1,555
Carbon Monoxide	28,800	0.00
Arsenic	4.5	0.03
Lead	2.28	0.01
Cadmium	0.08	0.01
Mercury	3.69	0.09

(All pollutants measured in pounds/year)

Source:

http://www.socalconversion.org/pdfs/Conversion_Technology_Environmental_Factsheet.pdf

<p>Myth:</p> <p>An OSGC expert claimed at the Ashwaubenon open house that the generators in this incineration gasification facility will sound like three jet engines taking off 24 hours a day. That does not support the claim that there will be no noise.</p>	<p>Fact: <i>This is false.</i></p> <p>This facility is <u>not an incinerator</u>. While the quote is intriguing, it cannot be verified who said it, in what context or, as we believe, it was misunderstood.</p> <p>The following data shows that noise outside the facility will not be significant.</p> <table border="1" data-bbox="507 607 1439 976"> <thead> <tr> <th>Distance from Facility</th> <th>Noise Level</th> <th>Comparison</th> </tr> </thead> <tbody> <tr> <td>23 feet</td> <td>85 dB</td> <td>Average Traffic (from inside a car)</td> </tr> <tr> <td>46 feet</td> <td>21.25 dB</td> <td>Whisper</td> </tr> <tr> <td colspan="3" style="text-align: center;">Noise < 15 dB Human Hearing Threshold</td> </tr> <tr> <td>69feet</td> <td>9.35 dB</td> <td>Calm breathing</td> </tr> <tr> <td>92 feet</td> <td>5.75 dB</td> <td>NA</td> </tr> <tr> <td>115 feet</td> <td>3.4 dB</td> <td>NA</td> </tr> <tr> <td>230 feet</td> <td>.85 dB</td> <td>NA</td> </tr> </tbody> </table> <p>In addition, it is unrealistic to expect there will be absolutely no noise generated inside a facility of any type (including our own homes). The external noise generated will be minimal.</p> <p>Source: http://vancouver.ca/engsvcs/projects/soundsmart/soundAndNoise.htm</p> <p>Source: <i>OSHA permissible Noise Exposure: 90dB – 8 hours</i> http://multimedia.3m.com/mws/mediawebservlet?mwsId=SSSSSu7zK1fslxtUPx_eOxfSev7qe17zHvTSevTSeSSSSSS--</p>	Distance from Facility	Noise Level	Comparison	23 feet	85 dB	Average Traffic (from inside a car)	46 feet	21.25 dB	Whisper	Noise < 15 dB Human Hearing Threshold			69feet	9.35 dB	Calm breathing	92 feet	5.75 dB	NA	115 feet	3.4 dB	NA	230 feet	.85 dB	NA
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	<h2>TECHNOLOGY</h2>																								
<p>Myth:</p> <p>Many companies claim their technology is not an incineration process; but the EPA and the European Union (EU) defines all of these processes as incineration. Cited is the U.S. Environmental, Hazardous Waste Management System: General subpart B-definitions, 260.10.</p>	<p>Fact: <i>This statement is false, unsupported and misleading.</i></p> <p>Nowhere in the document cited does it define gasification as incineration. In fact, the definition of gasification is:</p> <p><i>“Gasification. For the purpose of complying with 40 CFR 261.4(a)(12)(i), gasification is a process, conducted in an enclosed device or system, designed and operated to process petroleum feedstock, including oil-bearing hazardous secondary materials through a series of highly controlled steps utilizing thermal decomposition, limited oxidation, and gas cleaning to yield a synthesis gas composed primarily of hydrogen and carbon monoxide gas.”</i></p> <p>(continued on next page)</p>																								

	<p>The technology referred to as incineration in the document is “plasma arc,” which is a completely different technology than gasification.</p> <p>Source: http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=ec4c5aac5595f8b3838852dfd5b55594&rgn=div5&view=text&node=40:25.0.1.1.1&idno=40#40:25.0.1.1.1.2.1.1</p>
	<h2 style="color: blue;">COSTS & FINANCIAL VIABILITY</h2>
<p><u>Myth:</u></p> <p>The U.S. Energy Information Administration comparison of Waste-to-Energy Plants to coal and nuclear plants shows that WTE incinerators bear capital costs (\$8,232 per kw/hr) that are double the cost of pulverized coal plants and 60% higher than nuclear energy.</p>	<p><u>Fact:</u> <i>Part of this statement is false and the other part is misleading.</i></p> <p>This WTE project is <u>not</u> incineration based. Secondly, cost is only a part of the picture. While the costs associated with building and maintaining waste-to-energy plants might be higher than the costs of coal and nuclear plants, the U.S. EPA states that Waste-to-Energy plants avoid “nearly 1 ton of Carbon Dioxide equivalent emissions,” because of the following:</p> <p>Avoided methane emissions from landfills: When a ton of solid municipal waste is delivered to a waste-to-energy facility, the methane that would have been generated if it were sent to a landfill is avoided.</p> <p>Avoided CO2 emissions from fossil fuels combustion (e.g. coal): When a megawatt of electricity is generated by a waste-to-energy facility, an increase in carbon dioxide emissions that would have been generated by a fossil-fuel fired power plant is avoided.</p> <p>Finally, facility developers must decide for themselves and their businesses if the financial cost is worth the investment. <i>(continued next page)</i></p> <p>OSGC believes it is worthwhile from both a financial and environmental standpoint.</p> <p>Even more importantly, OSGC would not build, nor would it be allowed to operate, a facility that did not meet or exceed current health and safety standards.</p> <p>Source: http://www.energyrecoverycouncil.org/userfiles/file/ERC_2010_Directory.pdf</p>
<p><u>Myth:</u></p> <p>Incineration is a poor economic Investment.</p>	<p><u>Fact:</u> <i>This statement is false.</i></p> <p>Again, this is <u>not an incinerator</u>. The money being invested by OSGC is for pyrolysis and gasification equipment, including gensets and gasifiers, <u>not incinerators</u>. This investment is being made by a private corporation (OSGC) which has decided that it is a good investment from a financial, environmental and community perspective.</p>

	JOBS
<p><u>Myth:</u></p> <p>Very few jobs will be created for a very large capital investment.</p>	<p><u>Fact:</u> <i>The facility <u>will</u> create jobs</i></p> <p>The facility will create numerous engineering and construction jobs during construction in addition to creating 22 full time local positions when the facility becomes operational. Twenty-two jobs is not a small number. And, once again this is a corporate business decision.</p>
<p><u>Myth:</u></p> <p>WTE facilities cost community recycling jobs.</p>	<p><u>Fact:</u> <i>This statement is false.</i></p> <p>Communities' nationwide with waste-to-energy facilities have an aggregate recycling rate at least 5 percentage points above the national average. According to BioCycle / Columbia University data, the national recycling rate is 28.5% while the average recycling rate for WTE communities in the U.S. is 33.3%</p> <p>Waste-to-energy is part of an integrated approach to solid waste management that includes recycling as a core component.</p> <p>Source: http://www.energyrecoverycouncil.org/userfiles/file/2009%20Berenyi%20recycling%20update.pdf</p>
<p><u>Myth:</u></p> <p>No jobs will be created for county residents; the 22 jobs will be for tribal members only.</p>	<p><u>Fact:</u> <i>This statement is false.</i></p> <p>As of November 2010, the Oneida Nation employs 3,015 people; 50.5% Oneida and 49.5% others. OSGC will provide numerous engineering and construction jobs during the construction timeframe and will offer 22 full-time positions for experienced and qualified individuals when the facility opens. These jobs are not restricted to tribal members. In addition, it's important to remember that Oneida Tribal members live in Brown County, whether they live on or off the reservation.</p>
	TRANSPORTATION & OPERATIONS
<p><u>Myth:</u></p> <p>There will be 40 trucks per day coming into the facility.</p>	<p><u>Fact:</u> <i>This is misleading.</i></p> <p>There will be a maximum of 20 trucks coming to the facility every day. Yes, they do need to leave the facility as well, but it is inaccurate and misleading to say it's 40 loaded trucks per day. Currently, the proposed site has a daily traffic count of 10,000 vehicles.</p> <p>Source: http://www.dot.wisconsin.gov/travel/counts/docs/brown/ashwaubenon2009.pdf</p>

<p><u>Myth:</u></p> <p>There will be daily transportation of 150 tons of bio-waste though a dense population center. This waste will be sorted by hand, by one person in a biohazard suit, to search for toxic material</p>	<p><u>Fact:</u> <i>This statement is false.</i></p> <p>The waste that will come to the facility is Municipal Solid Waste (MSW); typical household waste. This is the same waste that goes to our landfills and is not a hazardous waste. Yes, the waste will be sorted to eliminate inappropriate materials (such as household paint, etc. that residents sometime throw into the garbage). Plant employees will not need to wear biohazard suits since there will be no toxic material brought to the plant.</p> <p>Additionally, the plant will increase the rate of recycling by removing #1 and #2 plastics, aluminum and various other metals. Approximately, 8% of all MSW is still recyclable.</p> <p>Sources:</p> <ul style="list-style-type: none"> • <i>Hazardous Waste Definition by EPA: http://www.ohio-state.edu/docs/envaff/cmguide/chapter3.pdf</i> • <i>MSW Definition: http://www.epa.gov/reg3wcmd/solidwastesummary.htm#waste</i>
<p><u>Myth</u></p> <p>Leaching of toxic metals cadmium, lead, and mercury occurs more rapidly at low pH, and contaminates groundwater.</p>	<p><u>Fact:</u> <i>This is false and misleading.</i></p> <p>The proposed Pyrolysis System is a completely closed loop system so all gases are contained. Likewise, all wastewater will be contained. It will also be filtered to a level that it can be disposed in a public sewer, just like dish, shower and sink water.</p>
<p><u>Myth:</u></p> <p>The facility will generate toxic ash (one ton of ash for every four tons of waste).</p>	<p><u>Fact:</u> <i>This is false.</i></p> <p>The fact is, for every 10 tons of waste, one ton of a byproduct called carbon ash (not toxic ash) will be produced. The byproduct is completely inert and the remainder can be, and is used in numerous industries.</p>
<p><u>Myth:</u></p> <p>The process is very inflexible and stifles innovation</p>	<p><u>Fact:</u> <i>This is false.</i></p> <p>Pyrolysis gasification is an <u>alternative to incineration</u>, a better and cleaner method of creating renewable energy; therefore it stimulates innovation and opens the door to advancing current waste-to-energy technologies.</p>
<p><u>Myth:</u></p> <p>The number of inbound trucks is will range from 25-48 trucks during business hours Monday through Thursday, and 75-144 trucks during</p>	<p><u>Fact:</u> <i>This is false.</i></p> <p>The maximum number of inbound trucks will be 25 per day. The claim that there will be 75 to144 trucks on Fridays is false and based on no data or actual information. <i>(continued on next page)</i></p>

<p>Friday business hours to stock up for weekends.</p>	<p>Simple Math:</p> <ul style="list-style-type: none"> • The facility will process 150/tons of MSW per day x 7 days a week = 1,050 tons/week. • Maximum 20 trucks per day (Monday through Friday) x 13 ton average capacity = 260 tons/day x 5 days (Monday through Friday) = 1,300 tons/week • Maximum of 20 trucks per day can supply more than enough MSW for the week in five days (Monday through Friday).
<p>Myth:</p> <p>The number of outbound trucks carrying the plant’s toxic nano-particulate byproduct may range from 7 to 12 per day, Tuesday through Friday, and 21 to 36 trucks on Mondays to remove each weekend’s accumulated byproduct.</p> <p>The remainder is blown by prevailing winds over a distribution area that includes most of Brown County.</p>	<p>Fact: <i>Both statements are false.</i></p> <p>Again, this is speculation and conjecture which is not based on any factual information. The byproduct, Carbon Char (not toxic ash), will be shipped in sealed containers at an anticipated rate of one, to a maximum of three, trucks per day. The byproduct is completely inert and can be used in numerous industries.</p> <p>Source: “<i>Yes, waste-to-energy ash is safe</i>” (http://www.energyrecoverycouncil.org/faq)</p> <p>The statement that the rest of the byproduct will be “blown away by prevailing winds,” is false. It would be impossible considering the byproduct, as well as the waste and everything else in the plant, will be in a closed loop system at all times.</p>
	<p>COMMUNITY & PUBLIC</p>
<p>Myth:</p> <p>Incineration is extremely unpopular with the public; so much so that the industry uses misleading terminology and names.</p>	<p>Fact: <i>This is false and misleading.</i></p> <p><u>Gasification is not incineration.</u> Incineration is the burning of fuels in an oxygen-rich environment, where the waste material combusts and produces heat and carbon dioxide, along with a variety of other pollutants. Gasification is the conversion of feedstocks into their simplest molecules: carbon monoxide, hydrogen and methane forming a syngas which then can be used for generating electricity or producing valuable products.</p> <p>Source: http://www.gasification.org/page_1.asp?a=79</p> <p>(continued on next page)</p>

	<p><u>Pyrolysis is not incineration.</u> Pyrolysis technology is different from conventional incineration. There are a number of noteworthy, additional differences between pyrolysis technology and conventional incineration.</p> <p>First, pyrolysis technology is an endothermic reaction (absorbs heat) while combustion is an exothermic reaction (releases heat). Secondly, pyrolysis occurs in the presence of an insignificant amount of oxygen.”</p> <p>Source: http://yosemite.epa.gov/r5/r5ard.nsf/2134f82000aa062c86257577004df4d77ea207b44e70abab862574c8006e223c/\$FILE/kulp3.pdf</p> <p>As for the assertion that the public is opposed to it; that is a generalized statement that cannot be factually supported. Arguments can be made to the contrary. Many believe, and science supports it, that this type of facility is safe and beneficial to the environment and community.</p>
<p><u>Myth:</u></p> <p>The facility won't get rid of landfills.</p>	<p><u>Fact:</u> <i>It has never been stated that the facility will eliminate landfills.</i></p> <p>Oneida's renewable energy facility will be able to dispose of as much as 80% of local municipal solid waste that would otherwise be landfilled. The project's purpose is to extend life of current landfills so communities do not need to build new landfills in the future.</p>
<p><u>Myth:</u></p> <p>It wastes valuable time (25 yrs. or more) to pay off massive capital investment costs involved with building an incinerator.</p>	<p><u>Fact:</u> <i>This statement is false.</i></p> <p>Once again, OSGC is building a Pyrolysis System, <u>not an incinerator</u>, which solves two problems at once:</p> <ol style="list-style-type: none"> 1. Producing electricity 2. Diverting waste from landfills and reducing emissions <p>Again, it is up to the private corporation (OSGC) to decide if the investment is worth it or not. OSGC believes it is a worthwhile investment from many perspectives.</p> <p>Twenty-five years of disposing of waste, while generating electricity, is not a waste of time. According to the EPA, “A total of 230 million tons of MSW was generated in 1999.” Most of this waste was land filled.</p> <p>Sources: http://www.epa.gov/reg3wcmd/solidwastesummary.htm#waste <i>Waste-to-Energy Plants avoid methane emissions generated from Landfills:</i> <i>“When a ton of solid municipal waste is delivered to a waste-to-energy facility, the methane that would have been generated if it were sent to a landfill is avoided</i></p> <p>http://www.energyrecoverycouncil.org/userfiles/file/ERC_2010_Directory.pdf</p>

<p><u>Myth:</u></p> <p>It is reckless to place a large, untried incinerator gasification demonstration project, that’s the first system of its kind next to a large number of residential homes, churches and schools.</p>	<p><u>Fact:</u> <i>This opinion is not based on factual information.</i></p> <p>This WTE project is <u>not</u> incineration based nor is it a first of its kind. The Pyrolysis Gasification units have been used successfully in the U.S. and around the world.</p> <p>“Demonstration Project” means the project will serve as an example to be followed by other communities willing to reduce methane emissions from landfills and CO2 emissions from coal burning plants.</p>
<p><u>Myth:</u></p> <p>WTE facilities are a burden in many ways:</p> <ul style="list-style-type: none"> • Plummeting property values • Widespread air, soil & water contamination • Adverse health impact • Tax increases upon neighborhoods further from the facility to make up for tax revenues lost from properties rendered valueless • Economic domino effect from chasing away business and residents due to the above. 	<p><u>Fact:</u> <i>These statements are false.</i></p> <ul style="list-style-type: none"> • There is no data indicating property values decreasing because of light manufacturing/industry nearby. This is clearly being used as a scare tactic. • There will be no widespread air, soil or water contamination. All EPA regulations will be strictly followed. Any wastewater (the same as residents’ sink and bath water) will be threaded and properly disposed.. This is clearly being used as a scare tactic. Please see the health and safety section of this document. • There is no adverse health impact data found at any other Pyrolysis operating facilities throughout the US or the rest of the world. This is clearly being used as a scare tactic. Please see the health and safety section of this document. • No data indicates there will be tax increases in the Village of Ashwaubenon because of this facility. This is clearly being used as a scare tactic. • No business has identified its intent to vacate their properties, because of this facility. Once again, the Ashwaubenon Business Park includes Light Manufacturing. The land is zoned light industrial by Oneida. This is clearly being used as a scare tactic.

	CONSTRUCTION
<p>Myth:</p> <p>The builder has only built one other building; this is the second one.</p>	<p>Fact: <i>This statement is false and unsupported.</i></p> <p>Alliance Construction and Design is comprised of more than 20 building professionals with an average of 23 years of experience each; completing more than 100 projects in the past year and a half alone.</p> <p>This is the first facility Alliance is building in partnership with a highly experienced engineering firm (ACTI: American Combustion Technologies Inc.) from California; a firm that has constructed other similar facilities. The building itself is a simple commercial structure which will look much like other offices on Packerland Drive. The technology will be installed and monitored by engineers from both ACTI and Alliance.</p>
	REGULATORY & LEGAL
<p>Myth:</p> <p>OSGC has chosen to ignore the illegality of incinerators in the surrounding zoning by wrongly suggesting its incineration gasification scheme somehow fits with the clean corporate enterprises flourishing in Ashwaubenon corporate business park.</p>	<p>Fact: <i>This statement is false.</i></p> <p>OSGC is not building incineration facility. <u>Gasification is not incineration</u> Incineration is the burning of fuels in an oxygen-rich environment, where the waste material combusts and produces heat and carbon dioxide, along with a variety of other pollutants. Gasification is the conversion of feedstocks into their simplest molecules - carbon monoxide, hydrogen and methane forming a syngas which then can be used for generating electricity or producing valuable products.</p> <p><i>Source:</i> http://www.gasification.org/page_1.asp?a=79</p> <p><u>Pyrolysis is not incineration.</u> Pyrolysis technology is different from incineration. First, pyrolysis technology is an endothermic reaction (absorbs heat), while combustion is an exothermic reaction (releases heat). Secondly, pyrolysis occurs in the presence of an insignificant amount of oxygen.</p> <p><i>Source:</i> http://yosemite.epa.gov/r5/r5ard.nsf/2134f82000aa062c86257577004df4d77ea207b44e70abab862574c8006e223c/\$FILE/kulp3.pdf</p> <p>In addition, according to the Municipal Code of the Village of Ashwabenon, The Business Park (Section 17-16- Business Park) allows Light Manufacturing.</p> <p><i>Source:</i> http://library.municode.com/index.aspx?clientId=14203&stateId=49&stateName=Wisc <i>onsin</i>, and “Light Industry District (LM)” is used interchangeably http://library.municode.com/index.aspx?clientId=14203&stateId=49&stateName=Wisc <i>onsin</i></p>

<p><u>Myth:</u></p> <p>There is no identified agency currently guarantying oversight and enforcement of Clean Air Act and Clean Water Act violations of this site.</p>	<p><u>Fact:</u> <i>This is false.</i></p> <p>This project is, and will continue to be, subject to EPA, DOE (Department of Energy) and BIA oversight as appropriate and as outlined in those organizations / agencies rules and regulations.</p> <p>The EPA has regulatory jurisdiction for pre-construction air permitting of facilities that are considered ‘major sources’ – that is with potential air emissions greater than 250 tons per year (each pollutant) for facilities located on tribal lands. The current OSGC project includes equipment and process capacity that would result in air emissions <u>lower than the ‘major source’ level</u>. Because the project is not a major source, no pre-construction permit is required.</p> <p>As for an environmental assessment (EA): An environmental assessment was conducted by an independent third party for OSGC and submitted to the BIA, which is currently reviewing the EA. In addition, the DOE is currently preparing its own EA as part of the NEPA process.</p> <p>A permit for operation, called the Operating Permit, will be required by the EPA for the facility once it becomes operational. The permit application will be prepared and submitted prior to the start of operation. This ensures all Clean Air Act requirements are met.</p> <p>In fact, in a December letter to the Village of Hobart, the EPA stated: "The EPA is currently in the process of gathering information regarding this facility. Any permit issued by the EPA for such a project must ensure that the public health and welfare is protected pursuant to all Clean Air Act requirements."</p>
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