

# Project Core, Knott & Perry Water Supply, and CoalFields Industrial Park Gas Supply AML Pilot

## Projects

### Perry & Knott County, KY Environmental Assessment

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## **1. PURPOSE AND NEED**

Consistent with the Consolidated Appropriations Act, 2017 (Public Law 115-31) and Consolidated Appropriations Act, 2018 (Public Law 115-141), the Department of the Interior's (DOI) Office of Surface Mining Reclamation and Enforcement (OSMRE) has made funding available for projects in the Abandoned Mine Land Reclamation Economic Development Pilot Program (AML Pilot) for Fiscal Year (FY) 2017 & 2018. The Pilot Program provided grants to the six Appalachian states with the highest amount of unfunded Priority 1 and Priority 2 Abandoned Mine Land (AML) problems based on OSMRE's AML inventory data. The funding for the proposed projects is a special allocation of general revenue funds under the Abandoned Mine Land Economic Revitalization Program (AMLER)/Abandoned Mine Land Reclamation FY17 and FY18 Economic Development Pilot Program. The principal benefit to be derived from the successful completion of the projects is economic stimulus for this coal region (Perry and Knott Counties, Kentucky and surrounding counties).

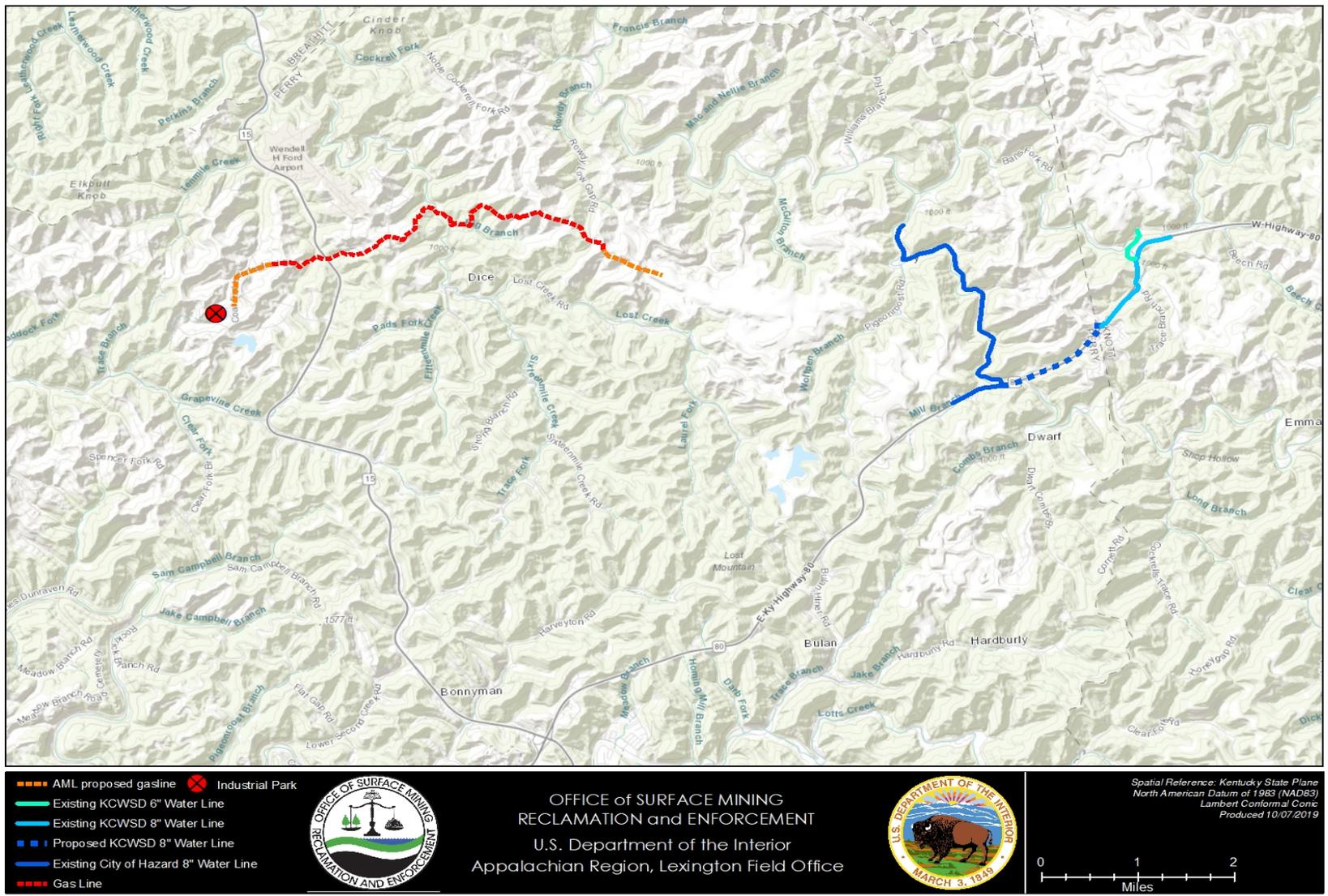
State AML programs, in consultation with state and local economic and community development authorities, developed a list of eligible projects in Appalachian counties that demonstrated a nexus with lands eligible for AML funding for reclamation. This AML Pilot is an opportunity for local communities and states to return impacted areas to productive reuse, as defined by the state in cooperation with local communities, to achieve the economic and community development goals identified for the community and/or region.

State AML Programs are encouraged to collaborate with their respective state and local economic development authorities and local communities to identify potential projects and apply funds from the AML Pilot to projects that will offer the greatest benefits for communities. The AML Pilot offers states and local communities' flexibility in deciding which projects offer the greatest opportunities within their communities.

Kentucky selects, by committee, specific projects from all project applications submitted for consideration. The committee is typically made up of 6 persons, includes representatives (sometimes cabinet secretaries or division commissioners) from Kentucky's Energy and Environment Cabinet, Finance and Administration Cabinet, and Cabinet for Economic Development. Applications are reviewed in accordance with OSMRE's grant guidance for such projects and the economic effects for local communities are a major consideration of the review. The list of selected projects is based on the committee's consensus of opinion.

The projects included in this review are inter-related and this environmental analysis addresses all projects. The projects are: the purchase, shipment/delivery, and installation of a new aluminum extrusion press and accessories at Coalfields Industrial Park (Project Core), install approximately 1.5 miles, or 8,000 feet, of subsurface 6" and 8" steel natural gas pipeline (Coalfields Industrial Park Gas Supply), and install approximately 6,200 linear feet of 8" water supply pipe, 4 gate valves, one water storage tank, one new booster pump station with Supervisory Controls And Data Acquisition (SCADA), and upgrade two existing booster pump stations, which one upgrade will include a power generator (Knott and Perry Waterline). These projects competed with other proposals and were selected by the Commonwealth of Kentucky to create an economic stimulus for this coal region in Perry and Knott Counties and surrounding communities.

Figure 1. Map of Coalfield Industrial Park and Proposed Gasline and Waterline



## 2 PROPOSED ACTION AND ALTERNATIVES

The [FY17 AML Pilot Guidance](#) and [FY18 AML Pilot Guidance](#) provide a process for evaluating proposed projects and offers states and local communities' flexibility in deciding which projects offer the greatest economic development opportunities. The Commonwealth of Kentucky has met these processes and has offered up its recommended proposed action that has been reviewed at various levels. As such, the following alternatives were considered:

- Expend money set aside as part of the AMLER Grant Pilot Program in order to stimulate the economy in this coal region via the implementation of the Project Core AML Pilot Project as proposed/described above.

Or:

- Take action to attract and acquire another business, likely manufacturing, to the same facility intended for Project Core (i.e. the same facility that Dajcor plans to locate to – the former American Woodmark buildings/property).

Or:

- Take no action at this time.

### 2.1 Preferred Alternative

This alternative considers the following three inter-related projects.

#### 2.1.1 Project Core

This project consists of the purchase, shipment/delivery, and installation of a new aluminum extrusion press and accessories. The Perry County Fiscal Court (PCFC) will own the press and lease it to [Dajcor Aluminum, Ltd.](#) for a period of fifteen (15) years. Also, Dajcor is required to occupy the former American Woodmark building, now owned by the PCFC, at the Coal Fields Regional Industrial Park at Hazard, KY.. Dajcor is an aluminum extrusion, fabrication, and anodizing company established in 2010 in Chatham, Ontario, Canada. Dajcor serves a range of customers in various industries including transportation, automotive, recreational, construction, and electronics, amongst others. Dajcor requires additional production capacity and has chosen to open a new operation in Kentucky. Dajcor estimates that Project Core will create two hundred twenty (220) new full-time jobs with an average total hourly compensation of seventeen dollars (\$17.00) per hour. Dajcor anticipates Project Core jobs will be filled by residents from up to twelve (12) surrounding counties.

[One East Kentucky](#) is a Kentucky nonprofit corporation and regional economic development agency for a 9-county region in Eastern Kentucky whose membership is comprised of private businesses and local chambers of commerce. One East Kentucky works to recruit industry and associated investments to Eastern Kentucky; and has recruited Dajcor to Perry County, Kentucky. Dajcor has been offered the former American Woodmark buildings/property at the [Coalfields Regional Industrial Park](#) with significant economic development incentives to develop Project Core as its first U.S.-based aluminum manufacturing facility. The Coalfields Regional Industrial Park is a partnership endeavor of five (5) Eastern Kentucky counties.

The estimated cost for the purchase, shipment/delivery, and installation of a new aluminum extrusion press and accessories for this project is \$6,500,000.

There will be no disturbance or tree cutting necessary to deliver and place the purchased aluminum extrusion press within the former American Woodmark building(s)/property at the Coalfields Regional Industrial Park.

#### 2.1.2 Coalfields Industrial Park Gas Supply

The proposed AML Pilot funded portion of the project proposes to install approximately 1.5 miles, or 8,000 feet, of subsurface 6" and 8" steel natural gas pipeline, from a well head in central Perry County, as part of a larger project to provide a natural gas supply to the Coal Fields Regional Industrial Park, approximately 9 miles north northwest of Hazard, KY. This action will positively promote regional economic growth and diversification and provide for new job creation at the Coal Fields Regional Industrial Park for displaced coal economy workers in this multi-county region.

The Industrial Park serves a five-county area, providing sites for manufacturing concerns, and is owned and operated by the Coal Fields Regional Industrial Authority. This Industrial Authority is governed by a Board made up of representatives from each of the five noted counties. The 236-acre Industrial Park has good highway access, public water, public sewer and electricity from Kentucky Power Company, but no natural gas. To attract new industries, all infrastructure needs to be in place.

The proposed AML Pilot project will fund the subsurface installation of a portion of this gas line (shown in orange on the attached maps). Construction includes a tie-in to an existing 6" steel surface laid Diversified Gas & Oil PLC gas line, located on the Hazard North 7.5' United States Geological Survey (USGS) quadrangle at 37o 21' 59" N and -83o 11' 47" W. The AML Pilot funded portions of the project are the sections of the proposed gas line shown in orange on the attached maps. Gas line installation will also include numerous appurtenances such as valves, reservoirs, and blow-down stations.

The entire AML Pilot funded portion of the gas line will be installed below the ground surface, via trenching and horizontal directional drilling (HDD), on previously-surface-mined areas, and alongside associated roads. Tree removal is not required. The previous coal-mining-related disturbances consist of significant upheaval, mixing, and removal of earthen material from deep excavation, grading, sub-surface drilling, fill material placement, and erosion. There should be no undisturbed earthen material to a depth of at least several feet at the areas slated for AML-funded gas line installation. Any road crossings will be accomplished via HDD or open cut and backfilled/compacted trenches.

Installation and maintenance of hay-bale silt checks and erosion control netting will minimize sedimentation at any creek crossings and other critical areas. All construction disturbances will be kept to a minimum and vegetated as soon as practical. The engineers and/or contractors retained for this project are required to obtain all necessary permits and the project will not be funded until all required permits and authorizations are issued. All gas utility work will be done in strict accordance with all U.S. DOT requirements and Pipeline Safety Regulations. Water trucks, powered brooms, and other methods will be used to control dust as needed.

The primary customer of the natural gas supplied by the gas line is an aluminum extruder (Dajcor Aluminum, Ltd. – associated with the Project Core 2018 AML Pilot Project) and will have a daily usage of approximately 220 dekatherm (215.69 MCF or approximately 215,000 cubic feet) at peak usage. The natural gas will be used in their process to heat aluminum prior to extrusion. The gas line is designed in complete accordance with USDOT Part 191 regulations. The gas line will be polyethylene (PE) with the exception of an area very close to the tie-in point, and at blowdown and reservoir stations (to collect liquids) where welded steel will be used. 100% weld testing will be used on all steel piping within the fenced limits of the tie-in station and at blowdowns/reservoirs.

All piping will be installed within a carefully-prepared trench bed with all areas using compacted sand as a supporting material, free of any rocks, which should provide a trouble-free base for the piping. All PE piping proposed shall use “high density” PE rather than the commonly used (in the gas industry) medium density PE for gas distribution. The use of high density piping will give the project a very significant margin between the proposed service pressure and the design-rated pressure of the pipe. The PE piping is essentially “jointless” and provides the best solution for leak free service in the gas industry and avoids the cathodic protection issues of steel piping. Telemetry (for monitoring only) at the tie-in station will be utilized and any flow which would indicate a leak will sound an alarm at the Hazard, KY Water Treatment Plant which is manned 24 hours per day/7 days per week. Should a leak occur, valves, which far exceed that required by Part 191, have been incorporated into the design and should allow the affected area to be isolated and repaired as soon as practical.

### 2.1.3 Knott and Perry Water Supply

The Knott & Perry Counties KY 476 and KY 80 Interconnect AML Pilot & Water Supply Project consists of installing approximately 6,200 linear feet of 8” water supply pipe, 4 gate valves, one water storage tank, one new booster pump station with Supervisory Controls And Data Acquisition (SCADA), and upgrading two existing booster pump stations, of which one upgrade will include a power generator. All features will be installed along KY Route 80 at, near the Knott/Perry County line approximately 7 miles, and northeast of the City of Hazard in Perry County. The new waterline will tie into an existing City of Hazard waterline, in Perry County, at the intersection of Route KY 476 and Route KY 80. This new line will travel along KY 80 in an east northeast direction into Knott County. The new water tank will be constructed in Perry County, essentially at the Perry/Knott County line, next to KY 80. The new booster pump station will be constructed along KY 80 approximately 5,000 feet, from the water tank, into Knott County along KY 80. The two refurbished booster pump stations are located farther into Knott County in the Knott County Water and Sewer District (KCWSD) at/near Irishman Creek and Montgomery Creek.

KCWSD will be considered the Grantee and will be the signatory with the KY Energy and Environment Cabinet (EEC) on the Memorandum of Agreement (MOA)/Contract for this project. Ownership of the waterline and appurtenances will be divided at the County line and KCWSD will own the master meter. KCWSD will sell the water to the City of Hazard via an existing Water Sharing Agreement. AML Pilot funds will be dedicated to construction of the water supply infrastructure as discussed above. This completed project will allow a sufficient water supply to customers/future customers of the Coalfields Regional Industrial Park at the City of Hazard. This industrial park is the site of the 2018 AML Pilot Project proposal – Project Core – an aluminum extrusion /manufacturing facility to be operated by Dacor, Ltd. This project should also alleviate some of the quantity (and quality) problems that the City of Hazard and the Village of Buckhorn (both in Perry County) have experienced, especially during the winter months. Customers in these

areas have been served by water supply projects that have previously been funded by normal AML Grants.

## **2.2 Attract and acquire another business (Alternative 2)**

PCFC and One East Kentucky had discussions with several companies prior to Dajcor. The most serious company that was considered was Project Feather; an automotive aluminum wheel manufacturer. This company had planned a large investment with some similarities to Dajcor, only their process was much dirtier, with hazardous materials, and required a significant upgrade to the facility. Also, during discussion with Project Feather, it became clear that in order to attract them, the facility would not only need to be purchased, the company did not wish to pay for any facility updates themselves. Although a formal bid was never completed, these updates, as well as machinery requirements to lure Project Feather, were estimated at roughly \$10,000,000 (facility purchase, renovations, and equipment purchases) that would have to be sourced from AML Pilot funds, with Project Feather not willing to allow the PCFC to own these items for an extended period of time.

Dajcor and their aluminum press were chosen because they understand the significance of PCFC maintaining control of both the facility and the extrusion press for a minimum of 15 years for security of any monies spent to attract them so that if any potential issues arise, PCFC would maintain the ability to utilize the facility and equipment to attract another job creator very quickly. This project creates more of a win-win between the company and PCFC than any other project that has been considered or come before. Additionally, Dajcor has pledged to be a partner with PCFC and One East Kentucky to assist in attracting additional manufacturers into the Coal Fields Regional Industrial Park, participating as a good corporate citizen in community projects and activities, and consistently donating to non-profits to assist with poverty issues in the community.

## **2.3 No Action**

Should the Commonwealth of Kentucky take no action, this coal region would not benefit from AML Pilot funds. Dajcor would not be a tenant of the Coal Fields Regional Industrial Park and, as a result, jobs would not be created and businesses and associated revenue from outside of the area would have less of an incentive to locate to the industrial park and boost the local/regional economy. The creation of additional related businesses, associated increased employment, and economic opportunity for the region will continue to be negatively impacted if no action is taken.

# **3 AFFECTED ENVIRONMENT**

## **3.1 General Setting**

The proposed Project Core AML Pilot Project will be developed, i.e., aluminum press installed, within an existing manufacturing building in the Coalfields Regional Industrial Park which is located on a previously-surface-mined area. The entire gas line will be installed below the ground surface, via trenching and horizontal directional drilling (HDD), on previously-surface-mined areas, and alongside associated roads. Similarly, the waterline will be installed below ground in existing right of ways adjacent to existing roads. Since the areas have already been disturbed, minimal environmental effects will occur.

## 3.2 Affected Resources

### 3.2.1 Historical/Cultural Resources

There are no known cultural or historic resources in or near the project area.

### 3.2.2 Fish and Wildlife

State and Federally listed species for the project area can be found in Appendix B.

### 3.2.3 Soils/Water

The [USDA NRCS Web Soil Survey](#) was reviewed for this project. The following tables list soil types for the gas line and waterline projects. Since no disturbance of the existing industrial complex will occur and were previously disturbed, no soils were examined for that area.

**Table 1. Gas Supply Project Soils**

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
FaB	Fairpoint soils, undulating	31.8	44.10%
FaF	Fairpoint and Bethesda soils, 2 to 70 percent slopes, benched, stony	18.3	25.30%
SCF	Shelocta-Cutshin-Gilpin complex, 20 to 75 percent slopes, very stony	5.3	7.40%
uShgF	Shelocta-Highsplint-Gilpin complex, 20 to 70 percent slopes, very stony	6.8	9.50%
uUdoC	Udorthents-Urban land complex, 0 to 15 percent slopes	6.8	9.40%
uUdrB	Udorthents-Urban land-Grigsby complex, 0 to 6 percent slopes, occasionally flooded	1.9	2.60%
uUduE	<u>Udorthents-Urban land-Rock outcrop complex, 0 to 35 percent slopes</u>	1.1	1.60%

**Table 2. Waterline Soils**

<b>Map Unit Symbol</b>	<b>Map Unit Name</b>	<b>Acres in AOI</b>	<b>Percent of AOI</b>
SCF	Shelocta-Cutshin-Gilpin complex, 20 to 75 percent slopes, very stony	1.2	1.50%
uShgF	Shelocta-Highsplint-Gilpin complex, 20 to 70 percent slopes, very stony	6.6	8.00%
uUdoC	Udorthents-Urban land complex, 0 to 15 percent slopes	2.5	3.00%
uUdoD	Udorthents-Urban land complex, 15 to 35 percent slopes	8.5	10.20%
uUdrB	Udorthents-Urban land-Grigsby complex, 0 to 6 percent slopes, occasionally flooded	18.4	22.20%
uUduE	Udorthents-Urban land-Rock outcrop complex, 0 to 35 percent slopes	44.8	53.9

No stream crossing occurs from the proposed actions. However, other portions of the Coalfield Industrial Park Gas Line (funded by other partners) does. The plan is to do horizontal directional drilling under the streams so that the streams are unaffected. USACE reviewed this project. No permits are required for this action and no effects to streams are anticipated.

#### 3.2.4 Agricultural

There are no agricultural activities occurring at, or near, the project site. Furthermore, due to significant coal mining and industrial park development disturbances at the project site, which removed, mixed, and compacted topsoil material, the project area is not conducive to any productive agricultural use or timber production. The [USDA NRCS Web Soil Survey](#) was reviewed for this project. No Prime Farmland was identified.

### 3.2.5 Recreation

The Coalfields Industrial Park is a commercial/industrial designation. The intent is for industry to operate the complex. Regardless of the outcome of this analysis, that will continue. No recreation opportunities exist. The Knott and Perry waterline is in the right of way of roads and highways. This area will continue to be a right of way. The Coalfields Gas Supply proposed location is designed in right of way of roads and through previous reclaimed AML sites. No recreation opportunities exist.

### 3.2.6 Small Business Use

The Coalfields Industrial Park is a commercial/industrial designation. The intent is for industry to operate the complex. Regardless of the outcome of this analysis, that will continue.

### 3.2.7 Air Quality

The Coalfields Industrial Park is a commercial/industrial designation. As there is no one currently operating in the complex there are no air quality issues. However, the intent is for industry to operate the complex. Regardless of the outcome of this analysis, that will continue. Should an operator be found by some other means, the air quality analysis in section 4.1.7 is likely what would occur.

### 3.2.8 Hazardous Waste

There are no known hazardous wastes within or near the project area.

### 3.2.9 Noise

The Coalfields Industrial Park is a commercial/industrial designation. As there is no one currently operating in the complex there are no noise issues. However, the intent is for industry to operate the complex. Regardless of the outcome of this analysis, that will continue. Should an operator be found by some other means, the noise analysis in section 4.1.9 is likely to occur.

### 3.2.10 Topography

The project site and surrounding area have been previously disturbed by coal mining activities. This project consists of construction/installation of a natural gas pipeline and waterline in a subsurface trench. This project will not change topography of the site.

### 3.2.11 Other (Socioeconomic or Political)

The project is intended to provide increased opportunities for the region by providing a natural gas supply to a regional industrial park to support a business that has agreed to locate in the park and to support other businesses that would benefit from the availability of natural gas. As a result, this project will provide additional economic opportunities that will positively impact low income and minority people and communities.

### 3.2.12 Cumulative Environmental Impact

There are no other known projects in or near the vicinity of these project areas. There are no other environmental issues known that would contribute to effects for the proposed action.

### 3.2.13 Environmental Justice

Coal jobs have fallen to their lowest level in 118 years, some of which may be attributed to mechanization, but the forces of supply-and-demand has had the most telling effect upon coal employment in Eastern Kentucky. The multi-county area of Breathitt, Harlan, Kott, Leslie and Perry counties has been a prominent production area, employing thousands of workers in the past. The following chart shows the decrease in coal mining’s direct employment:

**Table 3. Employment Change in Local Counties from 2012-2016**

<u>County</u>	<u>Employment (2012)</u>	<u>Employment (2016)</u>	<u>Change in Employment (2012 - 2016)</u>
Breathitt	62	48	-14
Harlan	1367	867	-500
Knott	330	252	-78
Leslie	605	245	-360
Perry	1530	966	-564

The impact of these job losses upon local economies is profound. The Kentucky Coal Association has prepared a table that shows the statewide financial effect of the loss of coal jobs: direct, indirect and induced. For purposes of this project proposal, these assumptions have been extrapolated to relate to the multi-county area.

**Table 4. Direct and Indirect Change of Benefits**

<u>Impact Type</u>	<u>Change in Employment</u>	<u>Avg Wages &amp; Benefits</u>	<u>2012-2016 Loss</u>
Direct	-1516	87816	-133000000
Indirect/Induced	-2213	45300	-100000000

A total annual loss of \$233,000,000 in these small economies is devastating and can be recovered by increasing the number of quality manufacturing jobs.

## 4 ENVIRONMENTAL IMPACTS OF ALTERNATIVES

### 4.1 Preferred Alternative or Alternative 2

#### 4.1.1 Historical/Cultural Resources

The Office of State Archaeology (OSA) was sent a solicitation for comment regarding the Coalfields Regional Industrial Park Gas Supply & Knott and Perry Water Supply AML Pilot Projects. The utility line placement design is in existing right of ways and previously disturbed AML lands that have been reclaimed that had previous clearance from KHC. KHC concurred that these projects will not have a negative impact to historical/cultural resources (Appendix D).

#### 4.1.2 Fish and Wildlife

A May 20, 2019 search of the Kentucky State Nature Preserves Commission (KSNPC) database for the Coal Fields Gas Supply Project revealed one (1) species of state concern, which is monitored by the KSNPC, occurs within one mile of the project site and four (4) federally-listed threatened and/or endangered species are known to exist within ten miles of the project site. The Kentucky Department for Fish and Wildlife Resources (KDFWR) commented on that project, per their May 20, 2019 letter, and did not identify any species that were not identified in the KSNPC Database search. The species noted in the searches are:

- Northern brook lamprey (*Ichthyomyzon fossor* – KSNPC Threatened)
- Kentucky arrow darter (*Etheostoma spilotum* – USESA Threatened)
- Gray bat (*Myotis grisescens* – USESA Endangered)
- Northern long-eared bat (*Myotis septentrionalis* – USESA Listed Endangered)
- Indiana bat (*Myotis sodalis* – USESA Listed Endangered)

As indicated in the attached memorandum (Appendix B) by KY DAML Biologist Edwin A. Boone, Jr., dated May 20, 2019, the proposed projects will not have a negative impact on the listed species. The Project Core Project includes no ground disturbances or new construction of buildings, will not negatively impact fish or wildlife resources. The Knott and Perry Water Supply waterlines will be placed in right of ways immediately adjacent to roads. No tree clearing will occur. As such, this project will not negatively impact fish or wildlife resources.

#### 4.1.3 Soils/Water

Due to significant coal mining disturbances and industrial park development activities, soils within the project area are not conducive to any productive use such as agricultural production or timber production. This project requires no disturbances; therefore, soils will not be impacted.

According to a water resources review for the Coalfields Gas Supply Project, per a May 28, 2019 email from DAML Environmental Scientist Samantha Johnson, a Floodplain/Stream Construction permit, US Army Corps of Engineers (ACOE) Permit, and a Water Quality Certification (WQC) Permit are not required for that project. Similarly, Knott and Perry occurs within existing disturbed right of way beside existing roads. No permit is required for this project.

#### 4.1.4 Agricultural

Currently, there are no agricultural activities occurring at, or near, the project site. Furthermore, due to significant coal mining and industrial park development disturbances at the project site, which removed, mixed, and compacted topsoil material, the project area is not conducive to any productive agricultural use or timber production. The [USDA NRCS Web Soil Survey](#) was reviewed for this project. No Prime Farmland was identified. No effects to prime farmlands will occur as a result of the proposed action.

#### 4.1.5 Recreation

The specific project site is not being used for any known recreational activities. It is unknown whether a recreational entity would ever be interested in using the site. The project site is on private property, in an industrial park, and somewhat remote. It is unlikely that the site would be a viable candidate for any successful recreation-related endeavor and the proposed project is not infringing upon any recreational activity occurring at the site because there are no recreational activities

occurring at the site. As a result, the proposed project will not have a negative impact on recreational opportunities at the site.

#### 4.1.6 Small Business Use

It is unknown whether the specific project site would ever be used for small business purposes and there are no known viable and actionable intentions by other business entities to locate to the specific project site. The project site is a former industrial site at an industrial park. It is not being used for business purposes currently and there are no known intentions to use it for business purposes other than for the proposed Project Core AML Pilot Project/Dajcor Aluminum operation. As a result, the chance that the site would be used for another small business endeavor in the short term, at least, is significantly unlikely.

The purpose of this project is to facilitate the implementation of an aluminum extrusion business in the industrial park which will provide jobs and help attract businesses to bring much-needed revenue and employment opportunities to the area. This project will likely have a very positive impact towards small (and large) businesses in the area and the local economy in general.

#### 4.1.7 Air Quality

Implementation of this project would cause an insignificant change to air quality in the area.

The delivery of the press will be accomplished via typical tractor trailer transport that will take a few days of less to unload at the facility. As a result, any vehicle-related air pollutant emissions from the delivery and unloading operation at the project site will be negligible and not meaningful to any degree to warrant discussion within this EA.

The emissions of the Dajcor operation once the aluminum press has been delivered, installed, and in full operation, the company's only emissions come from burning approximately 140 dekatherms per day of natural gas, and the associated CO<sub>2</sub> emissions of that. Dajcor Aluminum Ltd. is in the process of obtaining Air Quality Permit(s) from the state of Kentucky. There should be no significant issues regarding the issuance of Air Quality Permit(s) since Dajcor is not engaged in any form of heavy-emissions-producing work.

The [US Environmental Protection Agency \(EPA\) greenhouse Gases Equivalencies Calculator](#) – Calculations and References states the following regarding CO<sub>2</sub> emissions from natural gas:

Therms and Mcf of Natural Gas:

Carbon dioxide emissions per therm are determined by converting million British thermal units (mmbtu) to therms, then multiplying the carbon coefficient times the fraction oxidized times the ratio of the molecular weight of carbon dioxide to carbon (44/12).

0.1 mmbtu equals one therm (EIA 2018). The average carbon coefficient of natural gas is 14.46 kg carbon per mmbtu (EPA 2018). The fraction oxidized to CO<sub>2</sub> is 100 percent (IPCC 2006).

Note: When using this equivalency, please keep in mind that it represents the CO<sub>2</sub> equivalency for natural gas **burned** as a fuel, not natural gas released to the atmosphere. Direct methane emissions released to the atmosphere (without burning) are about 25 times more powerful than CO<sub>2</sub> in terms of their warming effect on the atmosphere.

## Calculation

Note: Due to rounding, performing the calculations given in the equations below may not return the exact results shown.

$$0.1 \text{ mmbtu}/1 \text{ therm} \times 14.46 \text{ kg C}/\text{mmbtu} \times 44 \text{ kg CO}_2/12 \text{ kg C} \times 1 \text{ metric ton}/1,000 \text{ kg} = \mathbf{0.0053 \text{ metric tons CO}_2/\text{therm}}$$

Carbon dioxide emissions per therm can be converted to carbon dioxide emissions per thousand cubic feet (Mcf) using the average heat content of natural gas in 2016, 10.39 therms/Mcf (EIA 2018).

$$0.0053 \text{ metric tons CO}_2/\text{therm} \times 10.39 \text{ therms}/\text{Mcf} = \mathbf{0.0551 \text{ metric tons CO}_2/\text{Mcf}}$$

## Sources:

- EIA (2018). [Monthly Energy Review September 2018, Table A4: Approximate Heat Content of Natural Gas for End-Use Sector Consumption](#). (PDF) (270 pp, 2.65 MB, [About PDF](#))
- EIA (2017). [Natural Gas Conversions – Frequently Asked Questions](#).
- EPA (2018). Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2016. Annex 2 (Methodology for estimating CO<sub>2</sub> emissions from fossil fuel combustion), Table A-41. U.S. Environmental Protection Agency, Washington, DC. U.S. EPA #430-R-18-003 (PDF) (101 pp, 3 MB, [About PDF](#))
- IPCC (2006). 2006 IPCC Guidelines for National Greenhouse Gas Inventories. Volume 2 (Energy). Intergovernmental Panel on Climate Change, Geneva, Switzerland.

The Dajcor operation will likely burn approximately up to 140 dekatherms of natural gas per day. A dekatherm is equal to 10 therms. As a result, the operation may burn approximately up to 1,400 therms of natural gas per day. If each therm produces 0.0053 metric tons of CO<sub>2</sub>, then an estimate of 7.42 metric tons of CO<sub>2</sub> would be produced per day or 2,708.3 metric tons of CO<sub>2</sub> produced per year.

According to the Department of Energy, the state of Kentucky produced 130 million tons of carbon dioxide in 2015 alone. The amount of carbon dioxide produced by this project per year is calculated to be 0.0000208330% of Kentucky's total 2015 CO<sub>2</sub> emissions.

Based on the analysis described above, this project will have an insignificant impact on air quality in the region.

The EPA's Envirofacts database (ICIS-AIR) for EPA Facilities/Air Pollution contains compliance and permit data for stationary sources of air pollution (such as electric power plants, steel mills, factories, and universities) regulated by the EPA and state and local air pollution agencies. The information in ICIS-AIR is used by the states to prepare State Implementation Plans (SIPs) and to track the compliance status of point sources with various regulatory programs under the [Clean Air Act](#). Envirofacts air release information specifically relates to industrial plants and their components (stacks, points, and segments). ICIS-AIR data can provide valuable information not only about the industrial facilities, but about the chemicals they introduce into the local air. Information is also available for management of operating permit applications and renewals.

Air quality testing has not occurred recently at the project site. A search of the ICIS-AIR revealed that a Nonattainment Area for Ozone exists approximately 54 miles northeast of the project site. This Nonattainment Area is associated with the metropolitan- Huntington, WV-Ashland, KY area. A report generator from the [NEPAassist geographic database](#) allows a maximum 12-mile radius for its NEPAassist reporting tool (i.e. it will gather information for a report within an area comprising a maximum radius/buffer of 12 miles from a point). The 12-mile radius report revealed no other recorded air pollution issues within a 12-mile radius from the project site.

There are eight monitored facilities for air pollution in the vicinity of the AML Pilot Project. The closest two are approximately 2.5 miles west of the project site. It appears that all of the closest eight facilities have no air quality violations recorded and the most recent date of any records in this database regarding air quality violations for any of the facilities is April 2014, over 5 years ago. This information suggests that there are no air pollution concerns to be considered with the proposed project as it relates to these monitored facilities approximately 2.5 miles away or more.

The Coalfields gas supply project can be anticipated to be a 9-month/36 week+ (270 days) construction contract. According to the analysis in the attached tables, construction activities on this project are estimated to produce less than 697 tons of Carbon Dioxide (CO<sub>2</sub>) emissions over the length of the project. According to the Department of Energy, the state of Kentucky produced 130 million tons of carbon dioxide in 2015 alone. The amount of carbon dioxide produced by this project, assuming diesel-powered equipment usage (which creates more CO<sub>2</sub> emissions than gasoline-powered equipment usage), is calculated to be 0.000005361136615% of Kentucky's total 2015 CO<sub>2</sub> emissions.

Similarly, the Knott & Perry Water Supply project is anticipated to be about 2/3rds of the calculation of the coalfields gas supply. Overall, CO<sub>2</sub> emissions will not contribute significantly to degrade air quality.

Dust will be controlled at the project site with measures such as watering trucks, sprayers, and mulch as needed. This, in conjunction with the short-term project-related disturbance, will result in no negative air pollution impacts as a result of project construction.

#### 4.1.8 Hazardous Waste

Hydraulic Oil is the only product used in the aluminum pressing process that could be deemed hazardous or petroleum-related. The Dajcor company uses an average of 10,000 liters of oil per year for press operations at their Canadian facility and the facility associated with this project is expected to use a similar amount. The hydraulic oil will be captured in containment totes and recycled for future use. Nothing is dumped or lost. Their processes require recapture of oil and reuse until it is time for it to be recycled by an outside firm.

#### 4.1.9 Noise

Project-related noise will not have any long-term significant impact on residents in the area. The project area is located in a relatively isolated industrial park on the top of a mountain at a former coal mine site, with the closest residences to the industrial site located approximately one half of a mile, or more, away. Furthermore, the industrial park has been in operation for many years with industrial operations occurring during that time, including at the facility related to this project.

There is no construction activity associated with this project so noise as a consideration of this project, in that regard, is irrelevant. As mentioned previously, delivery of the press will be accomplished via typical tractor trailer transport that will take a few days of less to unload at the facility. As a result, any vehicle-related noise emissions from the delivery and unloading operation at the project site will be negligible and not meaningful to any degree to warrant discussion within this EA.

Intermittent noise will increase in the area due to increased vehicle traffic associated with business use of the proposed project site and surrounding businesses, for which the industrial park was designed for. However, no significant long-term negative impacts associated with an increased noise level should occur due to the location of the project/industrial park and since the proposed project is located at an already existing industrial park that was envisioned/created and constructed/designed to harbor business activities (particularly industrial-type business activities) which are expected to be noise generators. In other words, noise levels at the industrial park are to be expected and should not significantly increase in scope or magnitude as a result of the Dajcor aluminum press operation. Noise levels during the Dajcor operation, will not be different than noise levels encountered at any similar operation or similar industrial park in the Commonwealth of Kentucky or in much of the nation.

According to the [Federal Highway Administration](#), sound is composed of many frequencies, some of which may affect one person more than another. Because engineers measure sound in decibels (dB) on a logarithmic scale, when two sources of sound, each measuring 70 dB(A), are added together, the resulting sound level is not 140 dB(A) but 73 dB(A). The (A) refers to a weighting scale that approximates the manner in which humans hear higher frequencies better than lower frequencies.

Levels of highway traffic noise typically range from 70 to 80 dB(A) at a distance of 15 meters (50 feet) from the highway. These levels affect a majority of people, interrupting concentration, increasing heart rates, or limiting the ability to carry on a conversation. The noise generated by a conversation between two people standing 1 meter (3 feet) apart is usually in the range of 60-65 dB(A). Most people prefer the noise levels in their homes to be in the 40-45 dB(A) range, similar to the levels found in a small office. A reduction of sound from 65 to 55 dB(A) reduces the loudness of the sound by one half, while a reduction of sound from 65 to 45 dB(A) results in a loudness reduction of one quarter.

According to the [Caltrans Traffic Noise Basic Fact Sheet](#), the distance between a highway and residence can also affect noise levels. Doubling the distance between the highway and residence will result in a noise level reduction of 3 to 4.5 decibels, depending on the surface composition over which the noise is traveling.

The relatively isolated industrial park setting of this project area will help counter the effect of any short-term noise and any increased traffic from business use after the project is complete. After all, this is one of the main purposes of creating an industrial park – to concentrate and isolate industrial-type business activities and noise away from residential areas to minimize any negative impact to communities. Furthermore, traffic frequency associated with the project will be less than typical highway usage associated with a metropolitan area for which the two sources above reference. Even if the closest residents to the industrial park experience some noise disturbance as a result of project activity or Dajcor operation, this noise disturbance will be minimal.

Gas supply and waterline projects noise levels may reach 100 dB(A) at a distance of 15 meters (50 feet) from the highway when heavy equipment is operating and intermittent. Most noise is unlikely to be heard over normal traffic noise.

#### 4.1.10 Topography

The project site and surrounding area have been previously disturbed by coal mining, road construction, and industrial park development activities. Other building(s) of similar size exists adjacent to the site and the building(s) associated with this project already exist. As a result, implementation of the Project Core AML Pilot Project will not affect topography or character of the site.

#### 4.1.11 Other (Socioeconomic or Political)

The proposed project will not adversely impact low income or minority persons or communities. The project is intended to provide increased opportunity for the region by allowing a manufacturing business to locate to the area which will employ local residents and likely attract other businesses to the area. As a result, this project will provide additional economic opportunities that will positively impact low income and minority people and communities.

#### 4.1.12 Cumulative Environmental Impact

No significant environmental impacts should occur as a result of the preferred alternative. No previous AML Reclamation Projects or AML Pilot Projects have been found to significantly negatively impact the environment. Typical AML Reclamation Projects are designed to reclaim problems threatening public safety where land or waters have been disturbed by abandoned coal mining, with insignificant negative environmental impacts during construction and after these reclamation projects are complete. Typical AML Pilot Projects are designed to bring jobs, consumers, and investment to the area. Authorized Pilot Projects have caused no significant negative environmental impacts during construction/implementation and after completion. Therefore, based on previous AML and Pilot Projects, and their insignificant impacts to resources as discussed above, the proposed alternative, will not have a significant impact upon the environment.

#### 4.1.13 Environmental Justice

Environmental justice concerns may arise from impacts on the natural and physical environment, such as human health or ecological impacts on minority populations, low-income populations, and Indian tribes, or from related social or economic impacts.

The proposed project will not adversely impact low income or minority persons or communities. AML Reclamation and Pilot Projects often occur in high-poverty areas, but do not produce a significant environmental impact. As discussed above, this project will not have a significant environmental impact. Because of the severe and distressed economic conditions confronting Perry and Knott Counties and the surrounding region, the county/region simply does not have the resources to move forward with opportunities, such as this project, without assistance from the AMLER Grant. This grant will allow this project to move forward, thereby having a positive impact, both economically (as described below) and ecologically (through an improved standard of living), to minority populations and low-income populations of Perry County and the surrounding region

The proposed project will have a significant positive impact upon job creation/employment and state and local tax revenues. The attached economic modeling/analysis for this project, completed by American Electric Power (AEP), provides details. Since this project will produce no significant environmental impacts and since the project offers significant anticipated economic benefits, low income and minority persons will benefit in regards to environmental justice.

## **4.2 No Action Alternative**

### **4.2.1 Historical/Cultural Resources**

If the Commonwealth takes no action, historical/cultural resources will not be impacted. It appears highly unlikely that any historical/cultural resources exist at the project site anyway since the project area has been significantly disturbed by previous coal mining activity and development of an industrial park.

### **4.2.2 Fish and Wildlife:**

Should the Commonwealth take no action, fish and wildlife resources will not be impacted.

### **4.2.3 Soils**

Should the Commonwealth take no action, soils at the site will not experience any impact to their current state. Due to significant disturbances by previous coal mining activity and industrial park development, soils within the project area are not conducive to any productive use such as agricultural production or timber production.

### **4.2.4 Agricultural**

Should the Commonwealth take no action, agricultural activities/potential at the site are unlikely to experience any impact to their current state. Currently, there are no agricultural activities occurring at the site. It should be noted that agricultural potential is likely highly compromised at the site due to the area having been significantly disturbed by previous coal mining activity and industrial park development. As a result, the general area/industrial park site is highly unlikely to be conducive to any meaningful agricultural production without major soil manipulation such as adding nutrients and relieving soil compaction.

### **4.2.5 Recreation**

The project site is currently not being used for any recreational activities – it is an industrial park not designed, sanctioned, or suited for recreational activities. Should the Commonwealth take no action, the site will remain, as chosen by the Perry County Fiscal Court, an industrial park that offers no outdoor recreational opportunities.

### **4.2.6 Small Business Use**

Should the Commonwealth take no action, it is unknown whether the specific project site would ever be used for small business purposes. This project represents a positive impact on small/large business use. Dajcor represents the most viable entity currently to desire to locate to the proposed project site that involves realistic and attainable incentives and preparation measures to make such a business plan a reality. As discussed above, the only other entity that was a possibility was Project Feather, but this was not a practical/pragmatic opportunity. The presence of Dajcor within the existing building at the industrial park will help attract other businesses to the industrial park and/or region.

#### 4.2.7 Air Quality

Should the Commonwealth take no action, air quality is likely to remain unchanged.

#### 4.2.8 Hazardous Waste

Should the Commonwealth take no action, it appears unlikely that any hazardous wastes would be produced/generated at the site.

#### 4.2.9 Noise

Should the Commonwealth take no action, noise is likely to remain unchanged.

#### 4.2.10 Topography

Should the Commonwealth take no action, topography of the area will likely remain unchanged.

#### 4.2.11 Other (Socioeconomic or Political)

Should the Commonwealth take no action, socioeconomic and/or political issues will likely worsen. The possibility of the area to serve and attract viable businesses are diminished, both in the short term and long term, without Dajcor locating to the Industrial Park.

#### 4.2.12 Cumulative Environmental Impact

Should the Commonwealth take no action, cumulative environmental impacts are unlikely to change.

#### 4.2.13 Environmental Justice

Should the Commonwealth take no action, Perry and Knott Counties, Kentucky, and surrounding areas, will continue to have limited economic growth to counter the decline in the coal industry. As a result, environmental justice implications will remain unchanged.

## 5 SUMMARY

The Commonwealth considered the following reclamation options:

- Expend money set aside as part of the AMLER Grant Pilot Program in order to stimulate the economy in this coal region via the implementation of the Project Core AML Pilot Project as proposed/described above.

Or:

- Take action to attract and acquire another business, likely manufacturing, to the same facility intended for Project Core (i.e. the same facility that Dajcor plans to locate to – the former American Woodmark buildings/property).

Or:

- Take no action at this time.

KYDAML selected the first alternative. It is the only option of those considered that may create economic stimulus for this coal region consistent with the goals of the AMLER Pilot Program.

## **6 CONSULTATIONS**

Agencies and databases consulted prior to the preparation of this document were:

- Kentucky Office of State Archaeology (OSA)
- Kentucky Heritage Council (KHC) – Programmatic Agreement
- Kentucky State Nature Preserves Commission (KSNPC) database
- Kentucky Department of Fish and Wildlife Resources (KDFWR)
- Kentucky Division of Water (DOW) floodplain database
- US Fish and Wildlife Service

## **7 PREPARERS/REVIEWERS**

### **Kentucky Division of Abandoned Mine Lands Personnel**

Edwin A. Boone Jr., Environmental Scientist IV

Samantha Johnson, Environmental Scientist V

Bill Overman, Assistant Director

### **Office of Surface Mining Restoration and Enforcement**

Don Hall, Abandoned Mine Lands Program Specialist

Matthew Moran, Natural Resources Specialist

Corey Miller, Branch Chief

# APPENDIX A. CO2 EMISSIONS ESTIMATES

Section E.1.g. Air Quality (Tables 1 - 6)

CO<sub>2</sub> Emissions Estimates for AML Projects

TABLE 1: Fuel Consumption Rates		
From: The Food and Agricultural Organization of the United Nations (FAO) estimate on heavy equipment fuel efficiency <a href="http://www.fao.org/docrep/005/291/05379e05.htm">http://www.fao.org/docrep/005/291/05379e05.htm</a>		
Reference Table		
LMPH = liters of fuel used per machine hour LMPH=(K*GHP*LF)/EPL		
	Gasoline	Diesel
K (Fuel Consumption kg/brake hp-hour)	0.21	0.17
EPL (weight kg/liter)	0.72	0.84
LF (Load Factor) -Low	0.38	0.38
LF (Load Factor) -Med	0.54	0.54
LF (Load Factor) -High	0.7	0.7
1 Liter = 0.264172 US Gallons		

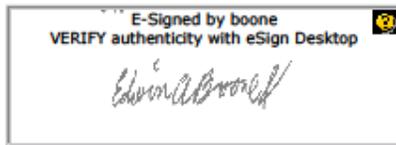
TABLE 2: Carbon Dioxide (CO <sub>2</sub> ) Emission Rates				
From: The EPA's AP-42 Compilation of Air Emission Factors (Chapter 3.3) Gasoline and Diesel Industrial Engines; Table 3.3-1 <a href="http://www3.epa.gov/ttn/ch03/ch03_03_01.html">http://www3.epa.gov/ttn/ch03/ch03_03_01.html</a>				
From: U.S. Department of Energy - Fuel Properties Comparison <a href="http://www.eitc.energy.gov/fuels/fuel_properties.php">http://www.eitc.energy.gov/fuels/fuel_properties.php</a>				
	Gasoline	Units	Diesel	Units
Carbon Dioxide Emissions Factor	154	lb/mmBtu	164	lb/mmBtu
Energy Content of Fuel	0.116009	mmBtu/gal	0.128488	mmBtu/gal
Carbon Dioxide Equivalent per Volume of Fuel	17.87784	lb/gal	21.072032	lb/gal
Carbon Dioxide Equivalent per Volume of Fuel	0.00893893	ton CO <sub>2</sub> /gal	0.010536012	ton CO <sub>2</sub> /gal

Table 3: Typical Equipment Usage on AML Projects			
From: 35+ years of construction experience and input from DAML Design and Construction Engineers and Construction Staff			
Machine	Project Size Less Than \$500 K	Project Size Greater Than \$500 K	Hours Used Per Week (40- hour Week)
Dozer - D4 (John Deere 450)	X		20
Excavator 1 - small (John Deere 60g)	X		40
Excavator 2 - medium (John Deere 75g)	X		40
Dump Truck - 6-wheel (Kamworth T880 Daycab)	X		30
Skid Steer/Compact Track Loader (John Deere 3202/313g)	X		40
Dozer - D4 (John Deere 450)		X	30
Dozer - D7 (John Deere D750)		X	40
Track Loader (John Deere 755K)		X	30
Excavator 1 - medium (John Deere 75g)		X	40
Excavator 2 - large (John Deere 245g)		X	30
Dump Truck 1 - 6-wheel (Kamworth T880 Daycab)		X	40
Dump Truck 2 - 6-wheel (Kamworth T880 Daycab)		X	40
Skid Steer/Compact Track Loader (John Deere 3202/313g)		X	40

## APPENDIX B. FISH AND WILDLIFE CONSULTATIONS/REVIEW

### MEMORANDUM

**To:** Coal Fields Gas Supply 2017 AML Pilot Project  
**From:** Edwin A. Boone, Jr., Environmental Scientist IV; Design Branch  
Section II, Staff Biologist



**Through:** Keith Coleman, Branch Manager; Project Eligibility Branch  
**Re:** Results of Kentucky State Nature Preserves Commission (KSNPC)  
database search  
**Date:** May 20, 2019

On Monday, May 20, 2019, I conducted a search of the KSNPC database in order to determine if any species that are monitored by the KSNPC are known to occur within the near vicinity (a 1 mile radius) of any of the site to be disturbed by this project, and if any federally listed threatened and endangered species are known to occur within the general area (a 10 mile radius) of these sites. These searches revealed that one species of state concern that are monitored by the KSNPC occurs within one mile, and that four federally listed threatened and endangered species is known to exist within ten miles of the project site. The species noted in the search are:

- Northern brook lamprey (*Ichthyomyzon fossor* – KSNPC Threatened)
- Kentucky arrow darter (*Etheostoma spilotum* – USESA Threatened)
- gray bat (*Myotis grisescens* – USESA Endangered)
- Northern long-eared bat (*Myotis septentrionalis* – USESA Threatened)
- Indiana bat (*Myotis sodalis* – USESA Listed Endangered)

In its comments regarding this proposed project, the Kentucky Department of Fish and Wildlife resources did not mention any species in addition to those noted above.

This proposed project is composed of a 2.16 mile-long corridor, within which a natural gas supply line will be installed. Following the completion of this project, other entities will complete the remaining

# APPENDIX C. ECONOMIC IMPACT ANALYSIS



## Economic Impact Analysis - Dajcor Aluminum Ltd

### Introduction

This report estimates the economic impact of Dajcor’s potential location in Perry County, KY at Coal Fields Industrial Park. The company proposes to create 220 jobs with average annual payroll of \$7,696,000. Operations would begin on January 1, 2019.

Although the facility would be located in Perry County, employees could live in surrounding counties Breathitt, Knott, Leslie and Letcher, thus it is important to show the impacts on the 5-county area.

The analysis was performed using IMPLAN software for economic impact modeling. IMPLAN develops local level input-output models to estimate the economic impact of new companies moving into an area, business closures, and other economic activities. This model is widely used by local, state and federal government agencies as well as private industry and universities.

The aluminum rolling, drawing and extruding industry does not currently exist in the 5-county study area so the analysis-by-parts technique was used. The state of Kentucky was used as the proxy region to model direct effects.

### Project Overview

The following table summarizes data and assumptions used in developing the economic impact model for this project.

Proposed Project Location	Perry County, Kentucky
Region Analyzed	5 Counties in Kentucky – Perry, Breathitt, Knott, Leslie and Letcher
New Employment	220 jobs
IMPLAN Sector	224 - Other aluminum rolling, drawing and extruding
Investment Date	January 1, 2019

### Estimated Operations Impact

The following analysis considers the economic impacts of the facility’s ongoing operations. It assumes full employment of 220 jobs at the facility opening on January 1, 2019. Facility operations will continue to provide economic impact as long as the facility is in operations.

In the 5-county study area, Dajcor’s operations could directly or indirectly support approximately 402 jobs (based on and including 220 direct jobs) with total labor income of \$27M. Labor income includes both employee compensation (wage and benefits) and proprietor income.

Indirect and induced employment impacts are seen across a cross section of sectors, with the largest contributions going to Wholesale Trade, Limited-service Restaurants, Management of Companies and Enterprises, and Hospitals.

# APPENDIX D. SHPO CONCURRENCE



MATTHEW G. BEVIN  
GOVERNOR

DON PARKINSON  
SECRETARY

**TOURISM, ARTS AND HERITAGE CABINET**  
**KENTUCKY HERITAGE COUNCIL**  
THE STATE HISTORIC PRESERVATION OFFICE  
THE BARSTOW HOUSE  
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PHONE (502) 564-7005  
FAX (502) 564-5820  
[www.heritage.ky.gov](http://www.heritage.ky.gov)  
January 17, 2018

REGINA STIVERS  
DEPUTY SECRETARY

CRAIG A. POTTS  
EXECUTIVE DIRECTOR  
& STATE HISTORIC  
PRESERVATION OFFICER

Mr. Bryan Kirby  
CEDA, Inc.  
114 N. 3<sup>rd</sup> St.  
Richmond, KY 40475

Re: Hazard/Coalfields Regional Industrial Pk. Natural Gas Line Proj., Perry Co., KY

Dear Mr. Kirby:

Our review indicates that the proposed project will not impact any properties or sites that are listed in or eligible for the National Register of Historic Places. The proposed project should not require an archaeological survey or cultural historic survey.

In the event that human remains are encountered during project activities, all work should be immediately stopped in the area. The area should be cordoned off, and in accordance with KRS 72.020 the county coroner and local law enforcement must be contacted immediately. Upon confirmation that the human remains are not of forensic interest, the unanticipated discovery must be reported to the Kentucky Heritage Council.

Should the project plans change, or should additional information become available regarding cultural resources or citizens' concerns regarding impacts to cultural resources, please submit that information to our office as additional consultation may be warranted. Should you have any questions, feel free to contact Nick Larcuente of my staff at [nicolas.larcuente@ky.gov](mailto:nicolas.larcuente@ky.gov).

Sincerely,

Craig A. Potts,  
Executive Director and  
State Historic Preservation Officer

CP:nd KHC #50709

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