

Attachment D

MPCA Correspondence



Minnesota Pollution Control Agency

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Attachment D
Docket No. E002/GS-08-690
December 17, 2010

November 17, 2010

Mr. Patrick Flowers
Xcel Energy – Environmental Services
414 Nicollet Mall MP 7
Minneapolis, MN 55401-1993

Re: Comments Regarding Lake Pepin Thermal Discharge Study
Prairie Island Nuclear Generating Plant
NPDES/SDS Permit No. MN0004006

Dear Mr. Flowers:

This letter is intended to serve as the Minnesota Pollution Control Agency (MPCA) comments on the Lake Pepin Thermal Discharge Study for the Prairie Island Nuclear Generating Plant (Thermal Study), which was submitted to the MPCA on September 22, 2010, for comments pursuant to a December 18, 2009, Order and Site Permit issued by the Minnesota Public Utilities Commission.

Based on review of the Thermal Study, the MPCA has determined that the information currently available adequately demonstrates that the conditions of National Pollutant Discharge Elimination System (NPDES)/State Disposal System (SDS) Permit MN0004006, which are based on applicable water quality standards, are met by the discharge of heated effluent from the Xcel Energy – Prairie Island Nuclear Generating Plant (PINGP). The information submitted in the Thermal Study report, as well as past studies and environmental review documents, indicate that the water quality standards will continue to be met downstream from the compliance monitoring point, which is identified in NPDES/SDS Permit MN0004006 as Lock and Dam #3, following a proposed extended power uprate at the PINGP facility.

As mentioned in previous discussions regarding this topic, the basis for the Thermal Study stems largely from concerns regarding ice formation at the head of Lake Pepin, and its affect on winter recreation. The Minnesota Public Utilities Commission has directed PINGP to seek advice from the MPCA regarding whether or not the Thermal Study adequately addresses the effects of the PINGP thermal discharge on ice formation. Although the MPCA is the agency that administers the NPDES/SDS permit which regulates the thermal discharge from the PINGP facility to the Mississippi River, protection of ice thickness for recreational purposes falls outside the scope of water quality standards and wastewater treatment requirements, which are the basis for the NPDES/SDS permit program. Therefore, if Minnesota Public Utilities Commission determines that further data collection is warranted based on the findings of this Thermal Study, the MPCA recommends that the Minnesota Department of Natural Resources be consulted regarding any possible future studies related specifically to ice thickness.

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Please contact me if you have any questions regarding these comments.

Sincerely,



Brandon E. Smith
Engineer
Land and Water Quality Permits Section
Industrial Division

BES:lmg

cc: Brent Kuhl, Xcel Energy
Jack Enblom, Minnesota Department of Natural Resources
Jamie Schrenzel, Minnesota Department of Natural Resources
Randall Doneen, Minnesota Department of Natural Resources