



Minnesota Pollution Control Agency

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May 8, 2009

Mr. Bill Storm
Minnesota Department of Commerce
85 7th Place, Suite 500
St. Paul, MN 55101-2198

RE: Xcel Energy Prairie Island Nuclear Generating Plant
Draft Environmental Impact Statement for Proposed Extended Power Uprate Project
and Request for Additional Dry Cask Storage

Dear Mr. Storm:

Thank you for the opportunity to review and comment on the Draft Environmental Impact Statement (DEIS) for the proposed extended power uprate (EPU) project and request for additional dry cask storage for Xcel Energy's Prairie Island Nuclear Generating Plant (PINGP). Regarding matters for which the MPCA has regulatory responsibility and other interests, MPCA staff has the following comments on the DEIS.

National Pollutant Discharge Elimination System/State Disposal System (NPDES/SDS) Permit

PINGP holds an individual NPDES/SDS Permit from the MPCA (MN0004006), which regulates the discharge of wastewater from plant operations to the Mississippi River. References in the DEIS to this permit characterize it as the "NPDES permit" (e.g., under **Chapter 1, Section 2.4 Other Permits, Wastewater Discharge Permit**); please correct future references to this in the final EIS. Also, for clarification, the issuance date for the facility's current NPDES/SDS Permit was September 23, 2005. The permit was modified twice in 2006 – on January 23, and again on June 30.

- **Chapter 1, Section 4.2 Biological Resources, Aquatic Communities**

In this section, the DEIS indicates that the MPCA has listed the portion of the Mississippi River between the St. Croix and Chippewa Rivers in Wisconsin as impaired waters for 2006 for aquatic consumption, due to the presence of mercury and polynuclear chlorinated biphenyls (PCBs), and for aquatic life due to turbidity. The current (2008) 303d List of Impaired Waters identifies these impairments, as well as an impairment for aquatic consumption due to Perfluorooctane Sulfonate (PFOS) in fish tissue. The final EIS should reference the most current impairment list, and should identify the PFOS impairment. The current List of Impaired Waters may be found on the MPCA's Web site at: <http://www.pca.state.mn.us/water/tmdl/tmdl-303dlist.html>.

The *Impingement and Entrainment* portion of this section details water appropriation limits in the facility's current individual NPDES/SDS Permit. These limitations restrict the volume of cooling water that is drawn from the Mississippi River during the April 15 to June 30 period. The DEIS does not make note of the fact that the permit allows the facility to exceed these volumes in order to maintain an 85°F condenser inlet temperature, provided that flow is minimized and cooling towers are operated to the maximum practicable extent. The final EIS should specifically address the fact that the facility is currently authorized to exceed the flow restrictions in order to maintain their ability to meet thermal limitations, and should discuss any potential increase in the frequency of such exceedances resulting from the EPU.

- **Chapter 1, Section 4.11 Water Resources, Surface Water**

The *Water Discharge: Temperature* portion of this section details the temperature limitations found in the facility's individual NPDES/SDS Permit. The DEIS indicates in this section that operation of the cooling system in open-cycle mode could result in a temperature increase in the discharge of up to 3°F, and that existing thermal effluent limitations would be met either through increased use of cooling towers or by de-rating the plant. The final EIS should, in general, provide additional details regarding the thermal modeling that has been used to determine potential temperature increases at the discharge and the point of compliance at Lock and Dam No. 3, and the facility's ability to meet the current effluent limitations following the EPU. This information will be required in order to reissue the NPDES/SDS Permit when the current permit expires in 2010.

Questions regarding PINGP's NPDES/SDS Permit should be directed to Brandon Smith at 651-757-2740.

NPDES/SDS Construction Stormwater Permit

Please note that, based on the description of the construction of the new storage pads for the dry cask storage expansion (**Chapter 2, Section 4.3 Water Resources**), it appears Xcel Energy/PINGP will need to obtain coverage under the general NPDES/SDS Construction Stormwater Permit from the MPCA. Coverage under the general Construction Stormwater Permit is required if a total project will disturb one acre or more of land. Please note that because the project is within one mile of, and discharges stormwater to, an impaired water, it is subject to additional best management practice requirements during construction, under the Construction Stormwater Permit. Questions regarding Construction Stormwater Permit requirements should be directed to Larry Zdon at 651-757-2839.

Air Emission Permit

PINGP holds an Air Emission Permit from the MPCA (04900030-004) which regulates non-radiological air emissions, such as nitrogen oxides, sulfur dioxide, and carbon monoxide, from 13 diesel-fired engines that are used for emergency purposes and one distillate-oil fired boiler used for plant steam. Based on the information provided in the EIS, the proposed EPU and dry cask storage expansion do not include changes to these emission sources or addition of new emission sources and, therefore, no changes to the PINGP Air Emission Permit are necessary.

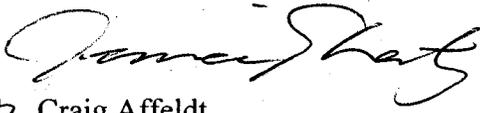
Questions regarding the PINGP Air Emission Permit should be directed to Steven Pak at 651-757-2633.

Hazardous Waste Generator License

PINGP holds a Hazardous Waste Generator License from the MPCA (MND049537780). They are registered as a small quantity generator (generating between 220-2200 pounds per month of hazardous waste). In 2008, PINGP generated 6,679 pounds of hazardous waste, mainly consisting of paint-related material, metals and PCBs. Based on the information provided in the EIS, it does not appear that the proposed EPU and dry cask storage expansion would necessitate any changes to PINGP's Hazardous Waste Generator License. Questions regarding hazardous waste licensing should be directed to Kathy Gedde at 651-757-2382

We look forward to receiving your responses to our comments. Please be aware that this letter does not constitute approval by the MPCA of any or all elements of the project for the purpose of pending or future permit action(s) by the MPCA. Ultimately it is the responsibility of the project proposer to secure any required permits and to comply with any requisite permit conditions. If you have any questions, please contact me at 651-757-2181.

Sincerely,


for Craig Affeldt

Supervisor
Environmental Review Unit
Environmental Review and Feedlot Section
Regional Division

CA:mbo

cc: Steve Pak, MPCA
Brandon Smith, MPCA
Kathy Gedde, MPCA
Larry Zdon, MPCA
Jessica Ebertz, MPCA
Karen Kromar, MPCA