

Mr. Todd A. Potas, P.E.  
Senior Project Manager  
Environmental Resource Group  
1000 IDS Center  
80 South Eight Street  
Minneapolis, MN 55402

June 11, 2002

RE: Simon Entergy LLC, Waterville Plant Draft Environmental Assessment  
Worksheet

Dear Mr. Potas:

I have reviewed the draft environmental assessment worksheet (EAW) and per our conversation of Monday, June 10, 2002, my comments are listed below:

#### Section 4

- The mandatory EAW category on the worksheet should be checked, not the EIS scoping category.
- EQB rule category subpart and name should be listed: 4410.4300, Subpart 3 Electric Generating Facilities.

#### Section 6

- Include in the discussion the megawatts of generation of the separate components (i.e., the simple cycle combustion turbine generator {CTG} and the heat recovery steam/steam turbine generator {HRSG/STG}).
- Describe the “black start” process mentioned within the text.
- The following paragraph, as it appears on page 3 of the draft EAW is confusing; suggested changes are shown. SEI anticipates obtaining right-of-way access for the connection of the new transmission line at this location, ~~because~~ Waseca County ~~does~~ may not have zoning ordinances that address high-voltage transmission lines. ~~Nevertheless,~~ The Power Plant Siting Act requires a permit for all transmission lines greater than 100 kV, but allows project proposers to seek local approval for certain types of transmission lines, including those less than 200 kV. ~~Therefore,~~ If local approval cannot be obtained, the 115 kV transmission line will require a permit from the Minnesota Environmental Quality Board.
- Page 3, paragraph 7, the comments on the gas pipeline should include a discussion on the pipeline routing process similar to the presiding paragraph on transmission line routing.
- Page 4, first paragraph states that SEI anticipates that construction will begin on July 2002. Given the review process this schedule is not possible. Minnesota Rules part 4410.1400 states that the RGU shall have 30 days from notification to the proposer that its submittal is complete to approve the EAW for distribution. Minnesota Rules

part 4410.1600 states that a 30 day public comment period shall begin the day the EAW is distributed.

- Page 4, subsection c, the first sentence as it appears is confusing; suggested changes are shown. SEI is the first minority independent power producer company in the nation. SEI is located in Waseca, Minnesota.

#### Section 8

- The table should list the Minnesota Department of Health (MDH) and the associated potable (i.e., production) well permit application.
- Under local agencies, the individual septic treatment system permit (ISTS) and associated local unit of government should be listed.
- Determine and document whether an access permit is required from the Minnesota Department of Transportation (MNDOT) and if so include this information in the table.

#### Section 12

- Change the last sentence in this section to state that the cooling water discharge point will be designed and constructed with the appropriate materials (i.e., geotext fabric, riprap, etc.) to dissipate energy and control erosion. Include in this discussion which regulatory body will oversee the design, construction and adequacy of these measures.
- Include in the discussion the anticipated temperature of the discharge water and the extent, if any, of the temperature change on the receiving body.

#### Section 13

- Include in the discussion a water balance table illustrating the estimated quantity (i.e., gallons per year) of water the facility will require, the estimated quantity (i.e., gallons per year) of water utilized in the various processes (i.e., potable, non-contact cooling, steam generation, turbine washing) and the estimated quantity (i.e., gallons per year) of water in each discharge (i.e., ISTS, ND PES discharge, spent turbine wash and steam effluent).
- Provide well construction logs, test borings or other data used to determine site lithology/stratigraphy and underlying aquifer data.

#### Section 16

- Include in the discussion the soil type likely to be encountered (i.e., Waseca County Soil Survey) and its susceptibility to erosion.

### Section 18

- Include a description of the treatment for the non-contact process cooling water.

### Section 19

- In subpart (b) include a discussion on the underlying resource aquifer (i.e., formation, depth, overlying stratigraphy, etc.).

### Section 31

- On page 14, in the last paragraph it is stated that the discharge from the oil/water separator will be to the “sanitary sewer.” For clarification this should be stated that the discharge will be to the “on-site ISTS.”

### Figure 1

- Use the existing figure as an insert, within a smaller scale localized map (i.e., 1:54,000) showing the proposed site position relative to the city of Waterville.

### Figure 2

- Indicate project boundaries, annotated with a legend, on the site map.
- Identify and label the east-west road at the top of the map.

### Figure 3

- Illustrate, annotated within the legend, the boundaries of the proposed leased property for this project.
- Illustrate, annotated within the legend, the treated non-contact process cooling water discharge pipe/point.
- Illustrate, annotated within the legend, the proposed transmission line connection.
- Illustrate, annotated within the legend, the proposed 6” gas line.
- Illustrate the 650’ section of asphalt access road.

If you have any comments or questions, please do not hesitate to contact me at 651-296-9535.

Sincerely,

William Cole Storm

cc: Angela Knish, Waseca County