MINNESOTA PLANNING ENVIRONMENTAL QUALITY BOARD

December 2, 2002

Mr. Michael J. Donnelly
Project Manager
Stanley Environmental Inc.
2658 Crosspark Road
Suite 100
Coralville, IA 52241

RE: Draft Site Permit Application
Faribault Energy Park
EQB Docket #02-48-PPS-FEP

Dear Mr. Donnelly:

I have received and reviewed the Site Permit Application dated November 2002, and per our conversation I am considering it a draft version.

Below I have listed my remarks (i.e., additions, comments and corrections) in response to each section of the draft site permit application.

Section 1:

Addition: Page 1-1, 1st paragraph. Include a discussion on the relationship of MMPA to Faribault Energy Park, LLC, similar to that presented in the CON application assembled by Dahlen, Berg and Company.

Correction: Page 1-1, 4th paragraph, second sentence. "One of its main responsibilities ~~if~~ is protecting the electric power network…"

Addition: Page 1-2, 3rd paragraph. The first bullet point listed should be the ten day notification provision found in Minnesota Rules 4400.2000, subpart 2.

Correction: Page 1-2, 4th paragraph, fourth sentence. "The following items are required in the site permit application as outlined…"

Section 2:

Addition: Page 2-2 under location. Include in this subsection the township name and the county in which the subject property is located.

Correction: Reference figures within the text by figure number, rather than title.

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Engineering and Operational Design and Analysis

Addition: Include a discussion of pollution control equipment (i.e., SCR, steam injection) and associated components (i.e., , ammonia injection system, ammonia storage).

Addition: Include a discussion on the various turbines being considered (i.e., GE PG7241{FA}CTG) and their specifications.

Addition: Include a discussion of water treatment equipment (i.e., recirculating gravel filter, single pass sand filter, UV disinfection).

Addition: Include a discussion on, if it is to be employed, the inlet air cooling system.

Addition: Include in the discussion whether the facility will contain a diesel back up generator (i.e., for black start capability) and if the fuel storage will be separate from that which is to serve as emergency power generation. Also, will that affect the above ground storage tank (AST) thresholds (Minnesota Rules Parts 7001.4205-4250) for major facilities.

Addition: Include in the discussion the MW rating for the combustion turbine and the MW rating for the HRSG.

Fuels and Fuel Storage and Staging

Addition: Include a discussion on the capacity and containment area of all fuel oil storage tanks (i.e., the two 500,000 gallon ASTs for emergency power generation and, if applicable, for diesel back-up generator) proposed for the facility. Discuss the applicability of the Minnesota Pollution Control Agency's major facilities requirements (i.e., AST).

Site Expansion Analysis

Addition: Include in the discussion how the site could accommodate expansion of generating capacity in the future (Minnesota Rules Parts 4400.1150, Subpart 1, Item I).

Addition: Include in the discussion what the effect of selling steam or hot water to a possible adjacent industry would have on the amount of natural gas consumed and the plant's generating capacity.

Infrastructure Needs

Electrical

Addition: Include in the discussion a brief description of MISO, similar to that appearing on page 1-1 in relation to MAPP, and the status of any interconnection study or service study.

Comment: Note that Minnesota Rules Part 4400.0500 allows the proposer of a LEPGP to apply for a site permit for a LEPGP and a route permit for a HVTL and a route permit for a pipeline in one application.

Fuel

Addition: Include the anticipated pressure (PSI) rating for the new 16 inch natural gas pipeline.

Correction: "The new 16-inch line to the plant site will consist of less than one mile of line and will be routed to the plant site ~~of~~ on private easement".

Water

Addition: Create and reference within the discussion a water balance table illustrating the estimated quantity (gallons per year) of water the facility will require, the estimated quantity (gallons per year) of water utilized in the various processes (i.e., potable, non-contact cooling, steam generation, turbine washing) and the estimated quantity (gallons per year) of water in each discharge (i.e., ISTS, NDPES discharge, holding tank).

Addition: Provide well construction logs (i.e., County Well Index search), geotechnical test borings or other data used to determine site lithology/stratigraphy and underlying aquifer data.

Comment: The last sentence on page 2-8 is confusing since previous statements indicated that all water consumed at the proposed facility will be obtained from private wells.

Waste Disposal

Addition: Rename this heading Solid Waste Disposal.

Wastewater

Comment: Describe where the floor drains located in the "fuel storage buildings or other process areas" of the facility will be discharged. Will this waste water stream include the wash down of accumulated particulates on the turbine blades?

Comment: Will the discharge to the created wetlands require a joint NPDES/SDS permit and if so include in the discussion the requirements (i.e., site evaluation, hydrogeologic study, monitoring) of that permit.

Addition: The report states that it is anticipated that spent cooling water will be discharged into a created wetlands. Describe the management of the spent cooling water if this option is not available (i.e., direct discharge to the drainway).

Federal, State, and Local Permits Required

Addition: Minnesota Rules Part 4400.100, Subpart 1, Item K. requires a brief description of each permit required. Expand the information in this section to contain the description of each applicable permit, including rule and/or statute.

Addition: Include the Rice County ISTS permitting requirements.

Comment: Determine if a Minnesota Department of Transportation access road permit will be required for the proposed facility and if so include it within the listed items.

Comment: Are any local (i.e., township or county) permits or approvals (i.e., ditch alteration, conditional use permit, emergency response plan) required?

Certificate of Need

Correction: Minnesota Rule Part 4400.1100, subpart 1, Item L requires that the site permit application contain a copy of the certificate of need from the PUC or documentation that an application for a CON has been submitted. In lieu of the certificate, simply state that an application has been submitted to the PUC and copy has been provided to the Minnesota Environmental Quality Board. Also, include the anticipated date of PUC action. In the final site permit application do not reproduce the entire CON application.

Figures:

1. Number each figure and reference the figures by number rather than title within the body of the text. Since various sections need to refer to figures, consideration should be given to creating a separate tabbed (i.e., Figures) section placed ahead of the appendix for the figures.
2. Correction: [Figure 1] Vicinity Map. The figure has no scale or cardinal points.
3. Correction: [Figure 2] Subject Property. The figure has no legend (i.e., what does the hatched area represent), no scale or cardinal points.
4. Addition: Create a figure to include an aerial photograph (i.e., recent/historic) with the concept plan overlain. Highlight the existing utilities (i.e., pipeline and transmission line).
5. Addition: Create a figure(s) illustrating the noise monitoring and modeling data.
6. Addition: Create a figure based on the county soil survey map.

Section 3:

Environmental Setting

Addition: Identify (i.e., name, address) of the “closest residence” and provide the distance this residence is from the (1) developed portion of the subject property and (2) the property line of the subject property.

Comment: It is unclear what is meant by "edge of the project site". When discussing the subject property it is best to refer to either (1) the entire property (i.e., subject property), (2) the proposed developed portion of the subject property or (3) the property line (boundary) of the subject property.

Addition: Page 3-1, 2nd paragraph mentions that the subject property is truncated by a surface water drainage or perennial stream. Include in the discussion the direction of flow and discharge into the Cannon River of this surface water.

Background Noise Survey

Addition: Provide the background noise data in both a table format and illustrated (i.e., sampling locations) on a figure. Include the dates and times that the measurements were collected.

Noise During Operation

Addition: Provide the manufacturer's expected noise rating (i.e., 90 dBA at one meter) for each type and model of turbine considered and for each major source. Provide the noise data in table format.

Addition: Provide noise attenuation model data in both a table format and illustrated (i.e., predicted values as radius from the source) on a figure. Expand the radius out to include the nearest receptor.

Addition: Provide a brief description of the model simulation used (e.g., Power Acoustics' SPM9613) to obtain the noise level estimates at the plant boundary.

Comment: It is unclear what is meant by "plant boundary". When discussing the subject property it is best to refer to either (1) the entire property (i.e., the subject property), (2) the proposed developed portion of the subject property or (3) the property line (boundary) of the subject property.

Socioeconomic Impacts

Correction: There is a misplaced bracket at the top of the 3rd paragraph.

Public Service

Comment: The first sentence appears to be inconsistent with earlier information. Based on previous statements my understanding is that the facility will not require municipal water or sewer.

Effects on Land Based Economics

Zoning

Addition: Include in the discussion the current zoning status for the subject property and name the appropriate authority (i.e., township or county).

Land Use

Comment: The figure (i.e., aerial photo) referenced does not appear within the report. Create a figure to include an aerial photograph (i.e., recent/historic) with the concept plan overlain. Highlight the existing utilities (i.e., pipeline and transmission line).

Comment: The figure (i.e., soil survey map) referenced does not appear within the application. Create the figure and include it within the application.

Prime Farmland

Comment: The first paragraph states that the proposed facility is 250 MW with a corresponding allowable acreage of 140; I believe the latter number should be 125 acres. If you obtained the value of 140 allowable acres by subtracting the area for water storage and cooling ponds state that within the text.

Airport

Addition: Include in the discussion the orientation of the runway (i.e., northwest to southeast) relative to the site location.

General Comments:

1. Provide a definitions glossary as an appendix.
2. Create a separate tabbed Figures and separate tabbed Tables Section, placed before the appendix.
3. When referencing a statement or table include the reference number contained in Section 7 References.
4. The addition of Section and Subsection numbers would aid in the organization of the application. An example is the section on “Impacts on Human Settlement”; it is clear that “Displacement/Demographics is a subsection, but it is unclear whether Noise, Aesthetics, Human Health and Safety, Socioeconomic Impacts, Recreation and Public Services are meant to be subsections. Additionally, the same comment arises in the section on Effects of Land Based Economics, followed by Land use, Zoning and Transportation.

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

William Cole Storm, Staff
MEQB
cc: Randall Porter, Faribault Energy Park, LLC

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