BS

Minnesota Pollution Control Agency

Environmental Quality Board
OCT 2003

October 24, 2003

Mr. Bill Storm
Environmental Quality Board
658 Cedar Street
St. Paul, MN 55155

Re: Comments on Faribault Energy Park's Environmental Impact Statement Scoping Document

Dear Mr. Storm:

Thank you for the opportunity to comment on the Environmental Impact Statement (EIS) scoping document for the Faribault Energy Park (FEP) proposal to be built in Rice County. This comment letter addresses matters of concern to the Minnesota Pollution Control Agency (MPCA) staff reviewing the scoping document. MPCA staff is submitting the following comments for your consideration.

The scoping document provided to the MPCA on October 13, 2003, is generic in nature. This letter does not intend to provide great detail to those sections of concern to the MPCA. However, we do suggest that discussion of the following items be included under the following sections.

Section B.1.
This section should discuss the relationship of using natural gas versus fuel oil. FEP is asking to be allowed to use up to 2,500 hours per year on fuel oil. It would be beneficial to understand under what circumstances FEP might switch from natural gas to fuel oil.

Section B.3.
This section should discuss their selection of emission control equipment including a discussion about Best Available Control Technology analysis. There is already a good discussion of this topic in the site application.

Section D.3.
This section should also address carbon dioxide emissions by estimating total annual releases at maximum capacity.

Air pollutant emissions should be represented in a worst-case operating scenario. This may mean 2,500 hours per year on fuel oil and the balance on natural gas, or some other combination.

Section H.1.
The MPCA has a new policy that addresses what projects must undergo an Air Emissions Risk Analysis (AERA), formerly called an air toxics review. This policy states that all power plants over 25 MW must include a completed AERA in their environmental review document.
Page 5-13 of FEP's site application states that this project is not subject to an Air Toxics Review because it will fire natural gas only. However, FEP is now requesting to burn fuel oil up to 2,500 hours per year. Because the FEP project is over 25 MW and will be able to burn a significant amount of fuel oil, the MPCA is requesting that a completed AERA be included in the EIS. "Completed" means that the MPCA has completed review of the AERA.

Sections N.3. and O.5.
These sections will address stormwater and wastewater management. While the EIS need not included details plans and specifications, it should include enough information to determine if mitigation and pollution prevention measures are adequate to protection the environment and the public. For example, the MPCA would anticipate that the EIS will describe intended treatment, including a general description of design, specifics on what potential pollution problem this design is trying to solve, and why their chosen treatment plan is a good choice to solve that problem.

In addition, MPCA staff is curious about FEP's proposed idea to link an educational or "interpretative" park with stormwater and/or wastewater treatment. What does FEP envision? How will facility access be kept separate from access to the interpretative park (a safety concern)?

Section 8.0
It appears that FEP will need a National Pollutant Discharge Elimination System permit for its wastewater discharge and a fuel storage permit for fuel oil. The MPCA does not conduct "Archeological and Historical Reviews."

If you have any questions regarding these comments, please call me at (651) 297-1766.

Sincerely,

Susan Heffron

Susan Heffron
EQB Technical Representative
Agency Wide Planning
Office of Strategic Resource Management Systems

SH:mbo