



Minnesota Pollution Control Agency

October 15, 2003

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



Re: Comments NGPP Minnesota Biomass Environmental Assessment Worksheet

Dear Mr. Storm:

Thank you for the opportunity to comment on the Environmental Assessment Worksheet (EAW) for the NGPP Minnesota Biomass facility to be built in Waseca County. This comment letter addresses matters of concern to Minnesota Pollution Control Agency (MPCA) staff reviewing the EAW. MPCA staff is submitting the following comments for your consideration and response before a final determination on the need for an Environmental Impact Statement (EIS) is made for this project.

Item 6b: Description

Under the heading of "Agricultural Biomass," the EAW states that the agricultural biomass used as fuel will mainly be corn stover and other biomass fuels. Please confirm that "other biomass fuels" is limited to biomass derived from plant matter. In addition, the market created by this facility for baled corn stalks will likely contradict increased efforts to promote leaving crop residue in fields. Removing corn stalks from farm fields can result in soil erosion and sedimentation in surface water due to wind and precipitation. This concern is lessened if, during baling, corn roots are left in the ground.

Item 17: Water Quality: surface water runoff

The EAW states that the NGPP Minnesota Biomass project will create about 53 acres of new, impervious surface. Approximately 40 acres of this impervious surface will be used for fuel storage. This is a sizable amount of surface area to consider for stormwater treatment. The EAW does not provide enough detail to address this large amount of stormwater; only that land will be graded so that stormwater drains into a newly constructed pond. An EAW should inform the public about potential environmental effects and demonstrate how those effects will be mitigated through pollution prevention techniques or facility design. For that reason, the MPCA requests that the response to comments describe what an evaporation/holding pond is, including a general description of design, specifics on what potential pollution problem it is trying to solve, and why a pond is a good choice to solve that problem. (For site number one, discharging stormwater into the existing Industrial Wastewater Pond appears not to be an option, as long as the food processing plant is in operation.) The MPCA will require detailed plans and specifications prior to stormwater permit approval.

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Because of reasons listed above, the MPCA's policy requires the following proposed projects conducting an environmental review to include a completed AERA as part of that environmental review:

- 1) the proposed project falls under one of the mandatory categories in Minn. R. 4410.4300 or Minn. R. 4410.4400, and air emissions are expected to be greater than 100 tons per year after the use of control equipment; or
- 2) the proposed project is an electric generating facility greater than or equal to 25 megawatts (MW).

The MPCA is the Responsible Governmental Unit (RGU) to conduct the environmental review for projects listed in number one. The Environmental Quality Board is the RGU for projects listed in number two. The NGPP Minnesota Biomass project falls under number two above. Therefore, the MPCA requests that the environmental review for NGPP Minnesota Biomass include an AERA.

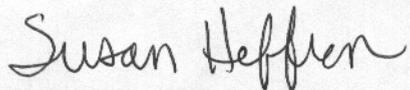
Item 24: Odors, noise, and dust

Under "Predicted Operational Noise," a drop-off rate of 4.5 dB/distance doubled is appropriate for attenuation calculations, as well as additional attenuation from acoustically absorptive ground features of surrounding agricultural fields. If windrows of fuel supply are always present and in a configuration that adequately impairs the propagation of sound to the nearest sensitive receptors it is appropriate to use them in sound attenuation calculations, if the windrows are removed at times, or reduced to a point that significantly reduce their effectiveness, they should not be included in the attenuation calculations.

In conclusion, because MPCA staff believes that an AERA must be completed and included with environmental review, and because of incomplete stormwater information, we cannot make a determination at this time whether an EIS is needed on the project.

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

Sincerely,



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

SH:jae

Agricultural biomass accounts for about seven acres of the fuel storage area. The EAW says that this fuel may have the potential to add nitrates to the stormwater. How and when will the stormwater in the holding pond be tested? Will stormwater be tested for possible pesticide/herbicide residual runoff in the stormwater? How will the stormwater be treated if nitrates and/or other chemicals are found?

Item 23: Stationary source of air emissions

Pollution Control Equipment

An air emissions permit application has been submitted to the MPCA. However, review of this application will not be completed prior to the comment deadline of October 15. Therefore, at this time, MPCA staff does not know if the project proposers have conducted a Best Available Control Technology (BACT) analysis to conclude that the pollution control equipment listed in the EAW is sufficient. The EAW states that the project will install a Selective Non-Catalytic Reduction (SNCR) system to control nitrogen oxide emissions (NOx) and a mechanical (multiple-cyclone type) particle collector used in conjunction with a final dust collector to control particulate matter emissions. The projects proposers should be made aware that they may need to install different control equipment pending MPCA review of a BACT analysis.

Hazardous Air Pollutant Emissions

Table 23-1 in the EAW includes information on the total amount of potential Hazardous Air Pollutant (HAPs) emissions. It also states that the major source of HAPs will be hydrogen chloride. The EAW should also contain information on what other HAPs are expected to be emitted, their estimated amounts, and the basis for their estimation.

Air Emissions Risk Analysis

Air toxics emissions and their associated health risks have become a greater concern to the general public in recent years. The MPCA, along with the Minnesota Department of Health (MDH), and other interested parties, have developed a tool called the Air Emissions Risk Analysis (AERA) – formerly called an air toxics review. The purpose of the AERA is to aid the MPCA in examining possible health threats from a list of toxic chemicals and to help the public understand those threats. The MPCA feels strongly that an AERA should be completed and included in an environmental review document (EAW or an EIS) if one needs to be prepared prior to the permitting process. One of the purposes of environmental review is to make significant environmental issues "...available to governmental units and citizens early in the decision making process." (Minn. R. 4410.0300, subp.3). Including an AERA in environmental review ensures timely consideration of a significant environmental issue – possible health risks from potential air toxics emissions. The most effective participation and meaningful discussions on potential environmental effects should and does occur during the environmental review process. Project proposers often change portions of their project design because of factors brought about in environmental review. Once a proposed project completes environmental review and enters the permitting stage, changing the facility design becomes less likely.