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Monday, September 29, 2003

Bill Storm
bill.storm@state.mn.us
658 Cedar Street
St. Paul, MN 55155

RE: EAW Project Title: NGPP Biomass

Dear Mr. Storm;

I have read and reviewed the above-listed EAW Worksheet and have the following questions or comments:

Page 4, Ash Handling System: The document states that 2 types of ash will be generated, bottom ash & fly ash; are these byproducts odorous or contain hazardous contaminants, do they require special storage, is it safe to assume they need to be soil-incorporated at state-defined agronomic rates?

Page 6 Commercial, industrial or institutional building area – areas of specific use & page 9 Cover Types. Surface and Ground water quality and quantity is of great importance to the citizens of Waseca County and as demonstrated in the Comprehensive Local Water Plan, proposed Comprehensive Plan and various Lake Associations. What specific efforts are being made to reduce or retain impervious surface storm water, contaminated runoff, and/or etc from affecting local watersheds and/or groundwater sources? By using the Cover Types table on page 9 it appears the impervious surface coverage of Site 1 is approximately 58% and Site 2 at approximately 67%.

Page 8, Item 9, paragraph 2, Site 2 & Page 28, Item 27 Compatibility with plans and land use regulations. **Please note the following correction**: Site 2 is zoned by Waseca County as Agricultural and lies directly west of a Highway Commercial Business zone. The land lying West of County Road 4 is zoned agricultural; the land directly east and adjacent is zoned B, Highway Commercial (Business).

Page 13, Water Quality: Surface Water Runoff, item a, Para. 3 re: Site 1. The paragraph states, ***if*** *a new pond is constructed water from the new pond may be pumped to the existing industrial wastewater pond, may be land applied, or it* ***may*** *be discharged to the LeSueur River.* It would be my hope that the should the water be discharged into the LeSueur River that the water would be of an appropriate rate, temperature, quality and quantity so as not to negatively impact existing aquatic, terrestrial or biological systems.

Page 18, Item 20 Solid wastes, hazardous wastes, storage tanks, Item B. The question was not fully addressed. Measures were not identified or described to prevent them from contaminating groundwater. Waste alternatives or methods of elimination, discharge or emission were also not addressed.

Page 20, Traffic Impacts I thought the traffic or anticipated daily counts were well described. What I found lacking from the information was; Is the existing transportation system designed to handle the additional traffic or would improvements be needed to support this additional traffic on these roadways? Secondly, it says the fuel supply will come from several source routes. Those routes also were not identified and are they able to carry any additional traffic that they may encumber from this proposed project? (P.S. I did forward an electronic copy of the EAW to the Waseca County Engineer Jeff Blue for his review of traffic impacts.)

Page 23, Stationary source air emissions, last sentence on the page talks about the cooling water producing a vapor plume on occasion. Will this vapor plume or does this vapor plume have the potential to negatively impact the traveling public either by producing thick, dense fog, or having the possibility of creating icy or wet road conditions? Has this issue been addressed, considered or a mitigation plan considered?

Page 24, Odors Will odors be generated from the site due to fermentation of either corn stalks or wood chips that has the potential to negatively impact the surrounding area, adjoining landowners or surrounding residents? Also, is there any potential at Site 1, if they are using effluent waters as a cooling source to potentially heat that water to a temperature that might somehow emit unpleasant and/or nuisance odors?

Page 27, Nearby resources. Please note that Waseca County does participate in the Minnesota Agricultural Preservation Act, MN Stat. Chapter 40A, of which approximately 1/3 of Waseca County land is enrolled. These two particular sites however, **do not** include an Agricultural preservation covenant.

Page 28, Visual Impacts The document states that the proposed stack will be 150 feet tall. Will this stack exceed the height standard of the Waseca Airport conical zone? If so, how will the project be affected? What alternatives exist to address this matter?

Thank your for the opportunity to comment on these matters. If you have any questions or comments, please feel free to contact me.

Sincerely,

Angela M. Knish
Planning and Zoning Administrator

cc: Fred Salsbury, Engineer, City of Waseca (by email)
Kris Busse, Administrator, City of Waseca (by email)
Waseca County Commissioners
Bruce Boyce, Waseca County Coordinator
file

Enclosure(s):