

Invenergy

November 23, 2004

Mr. Bill Storm
Minnesota Environmental Quality Board
658 Cedar Street, Room 300
St. Paul, MN 55155

Re: Docket No: 04-85-PPS-Cannon Falls EC

Dear Mr. Storm:

Invenergy has reviewed the Environmental Assessment and we commend you on the promptness, accuracy, and thoroughness of the assessment. In order to assure the record is correct and clear, we offer the following corrections and clarifications:

- In the Overview section of the EA, the date of the public hearing is incorrectly listed as December 2, 2004. This date should be December 1, 2004.
- In Table 17 of the EA, the distances listed are incorrect as a result of a discrepancy in our site permit application. Tables 4-2 and 4-3 listed different distances from the project equipment to the noise receptors. The distances listed in Table 4-3 are actually distances to the closest plant property boundary. The correct distances to accurately represent the distances to the plant equipment are:
 - Residence 1 – 1,400 ft
 - Residence 2 – 2,000 ft
 - Residence 3 – 1,600 ft
 - Residence 4 – 2,200 ft
 - Residence 5 – 2,100 ft
- On page 6, fifth paragraph, the EA states a generation building will enclose the CTGs. While it is true we are considering the building, we have not yet decided whether the building will be constructed. The building would provide additional protection from the elements, however, it is not required as the turbine components and auxiliary equipment are contained in heated weather enclosures. Including the building will actually increase the visibility of the plant from local area roads due to its required height and size.
- On page 11, first paragraph, the EA states that construction parking for up to 70 vehicles will be provided. The number of construction spaces will actually be higher. Enough onsite parking will be provided for the entire construction labor force. Off site parking will not be required.
- On page 11, second paragraph, the EA refers to pile driving activity. Although we haven't completed our detailed geotechnical analysis, the initial information available does not indicate the need for driving piles. If piles are indeed needed, the description in the EA is accurate.
- On page 11, fourth paragraph, the EA states that a construction crane will be used to lift the large pieces of equipment. Construction cranes will be used for most of

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the equipment, however the heavy items such as the combustion turbines and generators will be offloaded from the specialized haul vehicles with a gantry and walked over and placed onto the foundations. A simple cycle construction project does not generally have a construction crane with sufficient lifting capacity to pick up a combustion turbine or generator.

- On page 35, fifth paragraph, states “the remote start capability of the unit means that twenty-four hour staffing will not be required.” We do not want this statement to mislead people that the plant will operate without operations staff onsite. It is our intent to have the plant staffed at all times when the combustion turbines are operating if possible. If a situation exists where the plant is required to operate around the clock, the plant will be staffed through overtime and modifying shifts or if necessary supplement with experienced Invenergy employees from other plants and offices. The plant will have remote start capability, however, it will only be used if a qualified Invenergy employee does not arrive at the facility and start the combustion turbines within 80 minutes of Xcel’s request to start the plant. Invenergy will encourage its employees to live in the Cannon Falls area , which will make it more likely that a CFEC employee will always able to respond within 80 minutes to an afterhours Xcel dispatch request. In general, Xcel will provide 24 hour notice of any scheduled dispatches.
- On page 36, third paragraph, footnote 41 lists the Fairbault Energy Site permit application as the source. This is incorrect; it should reference the Cannon Falls Energy Center site permit application.
- Table 18 refers to the requirement for an above ground storage tank (AST) permit. Although Invenergy will be required to notify the MPCA of the ASTs, it is our understanding that an AST permit will not be required because the amount of oil stored on site will be less than 1 million gallons. Table 18 also refers to a risk management plan. As indicated in our Application, a spill prevention control and countermeasures plan (SPCC) will be prepared. It is unclear to us whether the EA is using the term “risk management plan” to refer to the SPCC, or whether you had something else in mind. We would appreciate clarification.

If you have any additional questions, please contact me at 312-224-1417.

Sincerely,



Joel Schroeder
Project Manager
Invenergy Cannon Falls LLC

cc: Bryan Schueler – Invenergy
James Bertrand – Leonard, Street & Deinard