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Metropolitan Council
300 Metro Square Building
Seventh and Robert Streets
St. Paul, Minnesota 55101

Telephone (612) 291-6359

1 copy

February 23, 1983

TO: PERSONS INTERESTED IN THE RAMSEY/WASHINGTON COUNTY
WASTE-TO-ENERGY PROJECT ENVIRONMENTAL IMPACT STATEMENT

You will find a copy enclosed of a document recommended as the Metropolitan Council scope for the environmental impact statement on the Ramsey/Washington County Waste-to-Energy Project.

The Council's Waste Management Advisory Committee will review the scoping document on Wednesday, March 2, 1983 at 2:00 p.m. in the Metropolitan Council Chambers.

The Physical Development Committee of the Metropolitan Council will discuss the advisory committee's recommendation the following day, Thursday, March 3, 1983. If you are interested in attending this meeting, please call the Council's Public Information Office for the agenda and meeting time (291-6464).

The full Metropolitan Council will make its scoping decision for the EIS on Thursday, March 10, 1983 at 4:00 p.m. in the Council Chambers.

If you have questions about the content of the scoping documents, please call me at 291-6412.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lynne Bly Takemoto".

Lynne Bly Takemoto
Senior Environmental Planner

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RAMSEY/WASHINGTON COUNTY WASTE-TO-ENERGY PROJECT
ENVIRONMENTAL IMPACT STATEMENT
SCOPING DECISION DOCUMENT

February 22, 1983

Prepared By

Metropolitan Council of the Twin Cities Area
300 Metro Square Building
7th and Robert Streets
St. Paul, Minnesota 55101 Tel. (612) 291-6464.

PURPOSE

The rules of Minnesota's Environmental Quality Board (EQB) require that an environmental impact statement (EIS) be conducted for any resource recovery facility which will process 500 or more tons of waste per day (6MCAR, 3.038). Within the Twin Cities Metropolitan Area, the Metropolitan Council is the responsible government unit (RGU) for these EISs.

Ramsey and Washington Counties have proposed the construction of a 600 ton per day waste incinerator in Lake Elmo which will reclaim energy to produce steam for sale to the 3M center in Maplewood. An EIS is mandatory for the project.

EQB rules require a public scoping process for any EIS (6MCAR, 3.030). This process reduces the scope and bulk of the EIS by identifying those issues relevant to the proposed project and restricting studies in the EIS to those identified in the scoping decision document. The Council has prepared an environmental assessment worksheet (EAW) for the Ramsey/Washington Waste-to-Energy project, in accordance with EQB rules, as the basis for a scoping process. A public scoping meeting was held on Feb. 10, 1983 and a comment period regarding the scope was open through Feb. 17, 1983.

This document represents the Council's decision as to what issues should be addressed to complete an adequate EIS on the project. This scoping decision is to be the basis for preparing the EIS and for evaluating its adequacy.

The purpose of the EIS is to function as a means of disclosing information about the significant environmental issues of a proposed action. The document is not intended to justify either a positive or negative decision on the project, but can be used as a guide in issuing or denying permits or approvals for the project and in identifying measures necessary to avoid or mitigate adverse environmental effects and to restore or enhance environmental quality.

PREPARERS

The EIS will be prepared by staff of the Metropolitan Council. Several special studies will be undertaken during the project evaluation for use in the EIS. Consultants will be hired for part of the work. Arrangements will also be made to obtain assistance for other government agencies such as the MPCA and the DNR. (The special studies are listed on page 9.)

CALENDAR

An EIS preparation notice for this project must be published in the EQB Monitor in or before April 25, 1983. Within the ensuing 280 days, a draft and a final EIS must be prepared and released for public review and the Council must make a determination of adequacy for the final EIS. A calendar for key dates in this process is shown in Table 1.

Table 1
RAMSEY/WASHINGTON COUNTY WASTE-TO-ENERGY EIS TIMETABLE

Submit EIS preparation notice to Monitor on or before	April 18, 1983
EIS Preparation notice published on or before	April 25, 1983
Metropolitan Council final determination of adequacy (due by Jan. 30, 1983)	Feb. 26, 1983

Intermediate Dates (Expected)

Draft EIS released	July 11, 1983
Public hearing on draft EIS	Aug. 10, 1983
Comment period closes	Sept. 9, 1983
Final EIS released	Oct. 24, 1983

PROJECT DESCRIPTION

The EIS will describe the project Ramsey and Washington Counties have proposed to undertake. The project description will include:

- a) Purpose of the project.
- b) Proposed location and existing characteristics of the facility site and the steamline route.
- c) A site layout showing major equipment and features of the facility.
- d) Conceptual diagrams.
- e) Description of the combustion technology used to produce steam.
- f) Identification of the general specifications for equipment and facility operation, including utilities, buildings, boiler features, pollution control equipment and labor.
- g) Steamline characteristics for typical segments, for example, size of steam and condensate piping.
- h) Steamline characteristics for areas requiring special design, for example, beneath roadways, at bridges, within other utility corridors, etc.
- i) Capacity for expansion.

ALTERNATIVES

The Ramsey/Washington Waste to-Energy project has precisely the purpose it is named for--to use mixed municipal solid waste as a fuel to generate steam, specifically steam to be sold to the 3M Company Inc. and possibly to others. Its purpose is neither solely to dispose of waste nor solely to produce energy. This purpose must be kept in mind when identifying potential alternatives to the project.

The EQB requires the EIS to address alternatives to the proposed projects. Specifically, the EIS must identify and assess impacts of alternative locations, design modification, magnitude of the project, other means of accomplishing the project purpose and finally, the no-build alternative.

Figure 1 shows the alternatives to the Ramsey/Washington County Waste-to-Energy project.

- a) Other sites studied by Site Task Force--In their efforts to locate the proposed Lake Elmo site, Washington and Ramsey County formed a task force to identify and compare potential sites within a feasible steamline distance (three miles) of the 3M center. This work will be referenced and the impacts of these alternative locations will be discussed in the EIS.
- b) Other Sites--Other sites that were not identified by the counties may exist within a feasible steamline distance of 3M. Efforts will be made to identify any such locations and to discuss their respective impacts.
- c) Other Steamline Routes--The counties have not previously identified or evaluated alternative steamline routes. Such alternatives exist and will be identified and compared for the EIS.
- d) Changes in Magnitude--There are several alternatives within this general heading: 1) A smaller plant to meet only 3M's needs; 2) A larger or expanded facility to accommodate substantial spin-off development; 3) a combination, with a smaller facility to serve 3M and another small facility on the Lake Elmo site to serve the surrounding area.
- e) Other Incineration Technologies--A mass burn facility is proposed. Other combustion technologies exist, including refuse derived fuels (preprocessed waste) and pyrolysis or starved air combustion.
- f) No Build--If the project is not constructed, two needs must be met. The first is meeting the on-going energy demand of 3M. Options include continuation of existing fuel usage or, alternatively, a change in the fuel source, for example, oil to coal. The second need is for daily disposal of 600 tons of mixed municipal solid waste. Each of the counties is required to have a master plan for waste management and for waste abatement. If this project is not implemented, then presumably other measures included in these plans would have to be expanded to meet the increased waste load. For the EIS, the no-build evaluation will focus on other fuel sources for 3M and on other waste management practices included in the counties solid waste plans.

GOVERNMENTAL APPROVALS

The EIS will list all known governmental permits and approvals required for the project and the unit of government responsible for each action. No permits are being sought concurrent with EIS preparation; the EIS will not be prepared with the intent to supply all necessary data for any particular permit application.

IMPACT ANALYSIS

The EQB requires the EIS to discuss environmental, economic, employment and sociological impacts for the project and each major alternative. Direct, indirect, adverse or beneficial impacts are to be identified. This work is the core of the EIS. Each major issue area is enumerated below with emphasis given to those issues that emerged from the scoping process as being most significant.

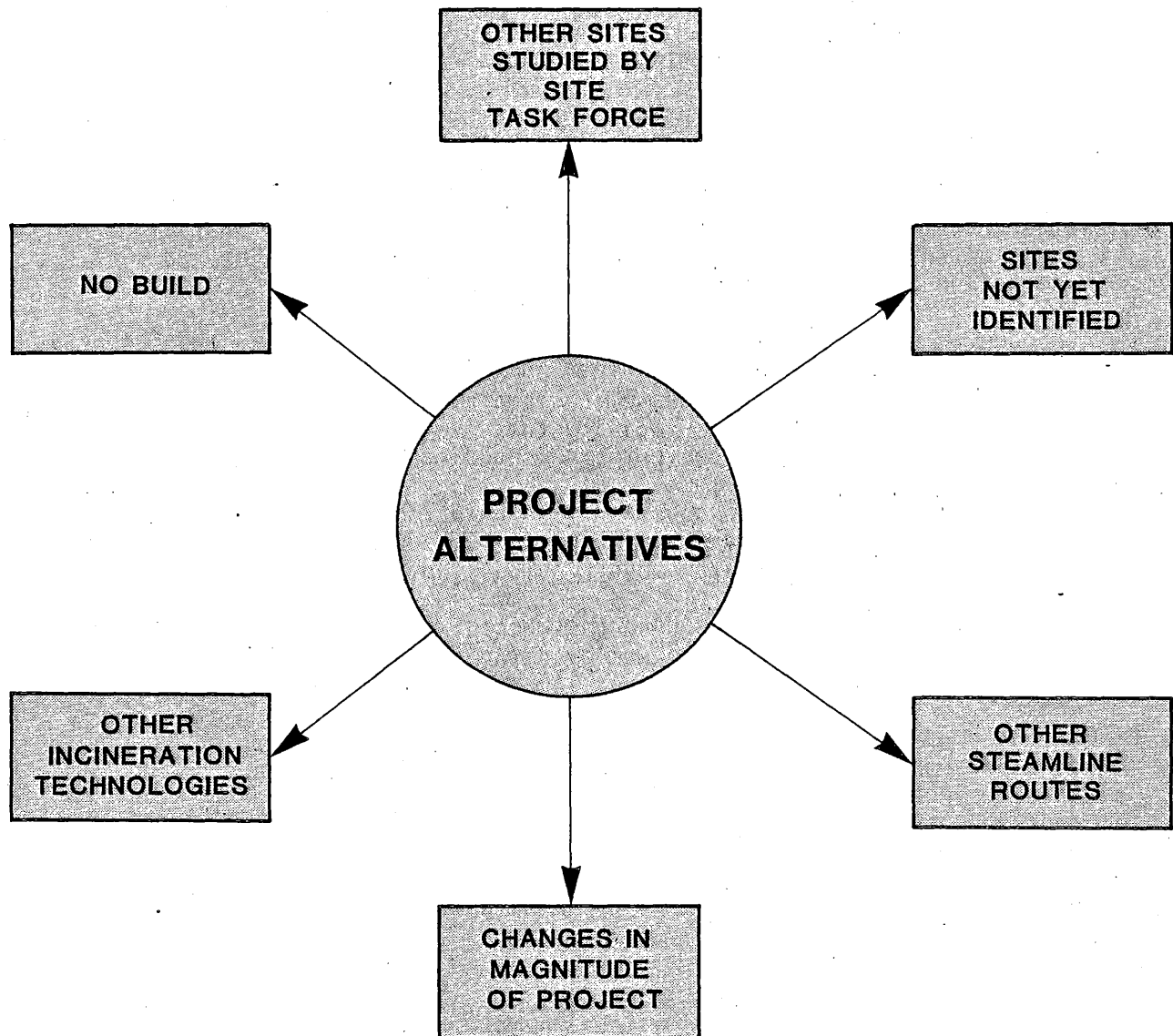


Figure 1. ALTERNATIVES

ENVIRONMENTAL IMPACTS

Air Quality

Air quality impacts can originate during construction, from traffic, from odors and from stack emissions.

Site preparation and steamline placement will generate dust. Other emissions can occur during construction due to traffic disruption or from construction equipment.

Air quality impacts from traffic are most likely to occur if there are congestion problems at points of access and egress to the site and to the local and the regional roadway systems. Carbon monoxide is the pollutant of greatest concern for this analysis. Ambient concentrations will be estimated in the vicinity of proposed access roadways and along potential alternative routes. The traffic volumes expected to be induced by the facility are low and should not have a noticeable impact along free flowing segments of the roadway network.

Potential odor sources to be addressed are odors from the tipping floor, from incomplete combustion of hydrocarbons or from other combustion by-products such as chlorides.

The MPCA has requested that the EIS assess the relative effectiveness of several kinds of air pollution control equipment. The EIS will provide at least a qualitative comparison of the impact of different systems, looking at impacts on pollutant concentrations and also system reliability and longevity.

The EAW already includes fairly complete estimates of the likely contribution of the facility to ambient concentrations of criteria pollutants, that is, pollutants for which state and federal ambient standards have been set. However, this work will be refined for the EIS.

In addition to the interim pollutants, several sources have expressed concern over the potential for and possible impacts of, emissions of metals, acids, toxic hydrocarbons and other trace emissions. A special study will be commissioned for the EIS to address this question. Impacts to be addressed will include health risk and possible damage to materials or vegetation. Results of this study will be used to gauge the need for ambient modeling for such substances.

Alternative sites will produce differing impacts on ambient air quality levels due to variation in priority to other emissions sources, topography, local meteorology and other factors. For alternative sites considered reasonably feasible, air quality impacts will be modeled.

For facilities of differing magnitude, the analysis will focus on how central systems are dependent on facility size.

Other technologies can alter emissions by change in combustion characteristics, for example, temperature or residence time. Likely effects will be addressed. Studies already completed on such alternative processes will be referenced where possible.

Changes in emissions for 3M resulting from fuel switching will be a part of the no-build study. Other comparative work will be tailored to the individual type of waste disposal strategy. For example, odors would be evaluated for a co-composting disposal system.

Geology

The implications of surficial and subsurface characteristics on facility design and engineering feasibility will be covered for the project, the steamline and each location alternative.

Surficial soil types will greatly affect the potential for soil erosion during construction phases. Any special measures needed to minimize soil erosion will be discussed.

Water Quality

The project could impact surface waters at several stages. The potential for increased soil erosion and attendant water quality degradation due to site preparation work and steamline placement will be addressed. Development will alter most drainage patterns. Changes due to the facility will be identified. If the economic analysis shows that the facility has a significant potential to induce nearby development, the EIS will also assess surface water management needs for the surrounding area. In particular, wetlands currently located on-site and nearby play a substantial role in runoff control. Consequences of loss of wetland storage capacity or additional storage needs due to the project or induced development will be addressed.

Two other avenues of surface water impact are linked to site operation: 1) site design and layout, and 2) fly ash and bottom ash. The adequacy of the site design and layout will be studied regarding control of possible spills of incoming materials and control of runoff for ash storage areas. To the extent possible, the chemical characteristics of runoff for fly ash and bottom ash will be identified.

These concerns will not differ substantially for the locational alternatives. However, surface water may be a more important issue for no-build options such as landfilling.

Groundwater impacts are clearly a compelling issue for the landfill no-build option. For the proposed project and technological alternatives, however, groundwater usage is a more pertinent issue. The demand and options for supply will be discussed.

Noise

Noise will be generated by traffic to the site and by facility operation as well. Background noise levels will be monitored on the site. A three dimensional noise model will be used to estimate impacts of haul trucks and existing traffic on residences along County Rd. 70. Efforts will be made to collect available data on operational noise impacts of resource recovery facilities as the basis for assessing potential noise impacts on planned industrial and commercial lands surrounding the project site.

Habitat Change

An on-site survey will be conducted to characterize the existing species of plants and animals resident on the site. Impacts resulting from site development will be described. Impacts of particular concern are temporary disruption of wetlands for steamline placement. Possible loss of wetland areas to induced development is also an issue. Air pollution studies will address the potential for stack emissions to affect nearby vegetation.

Waste Management

Several waste management issues arise with development of this project. They include management of wastewater, ash, recovered materials and handling of hazardous or pathogenic wastes.

It is likely that wastewater for the facility will require pretreatment prior to discharge to a municipal sewer system. Types of treatment alternatives will be identified as will the likely change in water quality after treatment.

Two forms of ash will be generated by the facility, bottom ash and fly ash. The amounts and characteristics of each will be described. The potential impact on leachate quality of mixing the two ashes will also be tested. Disposal options for the ash will be discussed including landfilling and alternative uses. The potential for spillage and frequency of removal are other issues that will be considered.

While Washington and Ramsey County have not explicitly proposed ferrous recovery as part of the project, neither has recovery of ferrous and other materials been precluded. Storage and handling needs associated with materials recovery, especially ferrous recovery, will be described in the EIS. The ability of site and building layout to enhance or hinder materials recovery will be assessed.

In the operation of any facility that receives municipal refuse, there is a possibility that unacceptable materials, such as hazardous or pathogenic wastes, may be received. The EIS will discuss expected frequency of such deposits and the procedures to be followed for identification, storage and removal of such materials.

Risk Assessment

Based on the demographic characteristics of the area surrounding the site and around other locational alternatives, a health risk assessment will provide a qualitative and quantitative description of the potential risk to sensitive persons for all air pollutants of concern.

Data available on comparable facilities will be used to address the issue of workplace safety. This issue will be discussed for the technological and no-build alternatives also.

Where the EIS has identified possible detrimental impacts, this section will compare the relative degree and duration of risk between alternatives.

Economic and Employment Impacts

For the construction phase of the project, this section of the EIS will discuss expected costs and employment opportunities. Operational impacts include job opportunities and any potential revenues from fees or taxes.

More significant are potential indirect impacts. Concerns regarding a possible negative effects on property values or on commercial or residential development will be addressed by reviewing the experience with development of similar waste-to-energy facilities elsewhere.

The project alternative of an expanded facility focuses on the potential for the project to induce new development surrounding the site. The EIS will identify existing demographic and development trends and forecasts for the area. The types of development capable of benefitting from the project will be listed and a discussion of the market for such uses will be given. The opportunity for spinoff development along potential steamline routes will also be addressed. If the analyses show a high probability of spinoff development, the EIS will also discuss the likely benefits and costs to affected communities: employment, housing, tax base, direct revenues as well as demand for services and utilities. A qualitative discussion will contrast likely economic impacts of the project with those alternatives, particularly the no-build alternative.

Sociological Impacts

Transportation

Analysis of traffic impacts will identify volume and type of traffic to the facility. Primary and secondary access routes will be evaluated. Issue pertinent to the high proportion of truck traffic will be addressed, such as safety, turning movements, grade, etc. The adequacy of or impact on local and regional roadway systems will be addressed for a design year and also for a future point in order to consider the combined effect of traffic from the proposed project and other development expected to occur in Lake Elmo and nearby communities. A similar analysis will be provided for other locational alternatives and for the no-build option.

Local Planning

The EIS will discuss local plans and ordinances effective for the project vicinity and steamline route. The compatibility of the project will be assessed and also the degree to which the project may require refinement or modifications to plans for services and utilities. This issue will be a major focus of the analysis of the project alternative showing induced development nearby. The project is of greatest potential impact to Lake Elmo, Oakdale, Woodbury and Maplewood.

Aesthetics

The project has the potential to have an aesthetic impact in the immediate vicinity of the site and also at a greater distance. Odors and the visual compatibility of the facility structures with planned surrounding industrial and commercial development are areas to be discussed. Odors will be addressed in the impact section on air quality. The analysis of visual impact will address the question of close range compatibility but will focus on the longer

range impact of the stack and water vapor plume. The EIS will identify the vistas from which the facility can be viewed and will illustrate the expected landscape modification.

There is currently extensive woodland buffering the area but much is located off-site. Change in landscape character as adjacent properties develop will also be assessed.

Service Disruption During Steamline Construction

There will be a temporary disruption of some services while the steamline is constructed. The EIS will describe the nature and duration of service disruptions associated with steamline construction for the proposed route and alternatives.

Historical/Archaeological

Historical and archeological resources of significance do not appear to exist on the site. Because the site is close to wetlands, however, there is a higher than normal potential for undiscovered archeological artifacts to be present. An archeologic survey of the site will be made and its results described in the EIS.

Mitigation Measures

EQB rules require that measures to mitigate the adverse impacts of a project be identified. The EIS will discuss measures to reasonably eliminate or minimize any adverse environmental, economic, employment or sociological impacts that may result from the proposed project.

Other Studies

The majority of the work to be undertaken for the EIS will be completed by Council staff. Several studies, however, will be conducted by consultants or other governmental agencies.

Consultants will prepare two major studies. The first will identify the composition and quantities of trace emissions from the incinerator. This study will also discuss health risks associated with these air emissions. The second study will investigate potential changes that may occur in waste stream composition and how they could affect the composition of stack emissions or bottom ash and changes in combustion characteristics.

The Minnesota Historical Society, the Department of Natural Resources and the Pollution Control Agency (PCA) will each be involved in special studies for the EIS. The Historical Society will review information collected during a site survey for archeological artifacts. The archeological survey itself will be conducted by a consultant. The DNR Natural Heritage Program will also survey the site, ensuring that any rare, endangered or threatened plant or animal species will be noted. Finally, the MPCA will help evaluate the noise impact of the site by gathering noise monitoring data.

SUMMARY OF A PUBLIC MEETING
ON THE RAMSEY/WASHINGTON COUNTY WASTE-TO ENERGY PROJECT

Tartan High School
Oakdale, Minnesota
February 10, 1983
7 p.m.

ATTENDANCE

Council Members: Mary Hauser, Dean Maschka, Kathy Ridder
Advisory Committee Members: Mary Ayde, Russ Edhlund, Floyd Forsberg,
Doug Wood
Council Staff: Karen Harrington, Bill Lester, Ted Smebakken, Lynne Takemoto,
Ray Thron, Joyce Bowers (intern)

SUMMARY

Council member Mary Hauser called on Lynne Takemoto, Senior Environmental Planner, to open the meeting with a description of the project and a summary of its background. She reviewed the steps involved in preparing an environmental impact statement (EIS) and explained the Council's role in the project. She emphasized the importance of identifying concerns to be addressed in the EIS at this stage in the process.

Leo Hudalla, Mayor, City of Oakdale, expressed concern over the impact of the incinerator on the community. He questioned the need to run the steamline through a residential area and said he felt homeowners would be inconvenienced. He said if the plant is built with insufficient capacity to supply steam to industries other than 3M, he could see no benefit to Oakdale. He asked if there would be compensation to the community, and requested that the physical impact of the steamline on 7th St., the impact of the use of County Rd. 70 by garbage trucks, and the visual impact of the stack and facility on the surroundings all be areas addressed in the EIS. He emphasized that his chief concern is benefits to the City of Oakdale.

Larry Whittaker, City Manager, City of Lake Elmo, stressed several points. The City feels it is essential to study impacts in all of Section 32 and the western third of Section 33. They request the broad study area so that the effect of the proposed plant on city facilities and services can be evaluated. There are no storm sewers, sanitary sewers, or municipal water supplies in the area now. The city feels that 1) a storm water management plan should be developed and approved, and 2) the provision of sanitary sewers and a water supply should be coordinated with the city so as to minimize overall costs and ensure system compatibility. Whittaker said the EIS should consider economic impacts on other city services, such as police, fire and street maintenance as well.

The city is also concerned about effects on nearby property owners. Whittaker specifically mentioned possible devaluation of the Brockman and Dreher properties while stressing the importance of considering impacts on all adjacent lands. The city recommends purchase of the entire Brockman parcel unless new access to the property is provided.

The two final concerns expressed by the city dealt with resource recovery and residue handling. Whittaker said the EIS should address recovery of at least ferrous metals, as well as storage, removal and transportation of ash from the plant to a landfill.

Robert Stevens, citizen, question the need to use 20 acres for the plant. If the site were smaller, it could be closer to or on 3M property. He expressed concern that residential and shopping center construction might be deterred. He felt that property values would be adversely affected.

Robert Burris, resident, was concerned that services on 7th St. would be disrupted while the steamline is being installed. He also asked about what would happen to the building when the incinerator ceased operation.

Concerns about property values were reiterated by another member of the audience. His opinion was that the figures for the projected traffic increase on County Rd. 70 are misleading since they equate truck with car traffic without accounting for the vehicles' differing impacts.

John Mahoney, resident, expressed the view that Oakdale expansion would be curtailed and property values would be lowered. He was concerned that garbage trucks would litter the highway and that haulers would be able to use routes other than the designated one.

Idine Mahoney, resident, said the incinerator should be located away from residences because of exhaust fumes, plant odors and threats to property values.

Dorothy Brockman was concerned that five acres of her property bordering on Helmo Av. would be acquired for the project. This would result in the isolation of the remaining parcel. Because of noise, lack of access and property devaluation she felt that all her property should be purchased. She expressed frustration over not being officially notified of plans for the plant.

Charles Kenow, Woodbury resident, asked what percentage of the project's cost would be paid by Washington County landowners and how much of the county's garbage would be disposed of at the incinerator. He was concerned that garbage collection rates would increase and asked who would pay the costs in the event of loss of the steam market. Air pollution problems were also a concern, especially an increase in SO₂ levels. Kenow expressed doubt that Air Quality standards could be met or that the plant would be odorless. He pointed out that Lake Elmo Regional Park is nearby and might be affected. He was concerned about an increase in traffic on Woodbury streets. The city has planned a new shopping center accessible from I-694 and traffic from this source might conflict with garbage trucks.

Jack Blackburn, resident, was concerned about hazardous emissions. He suggested that steam be converted to electricity on-site to allow for more flexibility in plant location.

Phil McConville, Hudson Area Recycling Association, asked how ash disposal would be accomplished and whether users would sort garbage prior to dumping. He advocated building several small facilities rather than one large plant. He asked how much of the project's cost would be met by 3M's purchase of steam. He repeated concerns about truck traffic and pointed out that the Helmo Av. roadbed might be unstable.

George Oxford, a garbage hauler, said that haulers' increased costs would be reflected in higher fees. He did not feel that 600 tons of garbage per day could be guaranteed.

Ken Saver restated these concerns and pointed out the average tipping fee at an incinerator (\$42 per ton) is four times as much as at existing landfills. He said that 3M would only buy steam if it is cheaper than other energy sources.

Laura Fraser, Lake Elmo resident, suggested that the Council coordinate an information meeting on the same night as the hearing on the draft EIS in order to facilitate public participation.

Jan Hill, Oakdale resident, spoke against the project. She cited possible cost overruns and increased garbage fees. She felt the incinerator should be built on 3M property and not near residences.

There was discussion of how public comments would be considered. Lynne Takemoto summarized the next steps in the scoping process. She said written comments could be submitted until February 17.

Bernard Brommer, resident, asked about the scope of the steamline construction and the size of the line. He expressed concerns about safety to workers at the site and to the community as a result of explosions and other accidents.

Washington County Commissioner Art Schaffer spoke in favor of the incinerator. He emphasized the importance of seriously considering all public comments, and pointed out that the final decision to build the plant has not been made.

The meeting was adjourned.



WASHINGTON COUNTY

OFFICE OF ADMINISTRATION

COURTHOUSE • 14900 61ST STREET NORTH • STILLWATER, MINNESOTA 55082
612/439-3220

M. Neal Erdahl
County Administrator
C. A. Riebel
Deputy Administrator
Virginia R. Dirksen
Office Manager

February 17, 1983

Ms. Lynne E. Takemoto
Metropolitan Council
300 Metro Square Building
St. Paul, Minnesota 55101

Dear Ms. Takemoto:

On February 10, 1983 the Metropolitan Council held a public meeting on the EIS for the Ramsey/Washington County Waste-to-Energy Project. The purpose of the meeting was to receive public comments needed to scope the EIS. This letter and attached comments address this issue and should be considered as part of the record for your public meeting. As indicated during the public meeting, the written record will remain open until February 17, 1983.

Comments from the public during the siting process and the EIS scoping process can be categorized by technical disciplines to be addressed in the EIS. Attached, please find a summary we have prepared which lists these technical disciplines and provides a brief discussion of the possible scope for the EIS. We are available to discuss our comments if you desire.

We wish to highlight our position on the consideration of alternative sites in the EIS. It is our position that the EIS followed a deliberate process which complied with the intent of the Environmental Policy Act, utilized local elected officials in decision-making, and yielded a unanimous decision to site the facility in Lake Elmo. We feel that this siting process need not be repeated in the EIS, and should be referenced in the introduction and/or executive summary sections of the EIS.

We look forward to receipt of your scoping decision document. Please forward a copy of this document to me when it is available. Please contact me if I can be of any further assistance.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "C. A. Riebel".

C. A. "Rip" Riebel
Project Manager
Waste-to-Energy Project

RAMSEY/WASHINGTON COUNTY
WASTE-TO-ENERGY PROJECT

SUGGESTED EIS SCOPE
February 17, 1983

Socioeconomics

Several citizens testified concerning the need for community impacts and benefits to be evaluated in the EIS. The primary concern is how the resource recovery facility will fit into the community, impact community services, and possibly change the character of the area. A socioeconomic analysis could address the following:

1. Regional, county, and local land use
2. Land use plans and controls
3. Recreation
4. Population trends
5. Population projections
6. Population characteristics
7. Employment trends
8. Earnings
9. Local property taxes
10. Community services and facilities including
 - a) water supply
 - b) sewage treatment
 - c) law enforcement
 - d) fire protection
 - e) health care
 - f) education
 - g) housing
11. Property values
12. Property ownership patterns

Alternatives

Although questions were raised concerning alternative sites, these comments are addressed by the previous siting effort. The siting effort conducted by the Counties used an interdisciplinary approach and, consistent with the Environmental Policy Act, evaluated a number of environmental criteria to identify the most feasible and prudent site in Lake Elmo. Therefore, the

EIS need not evaluate alternative sites and should only reference the previous siting effort and site study. Other alternatives could include alternative routes for the steam line and the no build alternative. The steam line has the potential for impacting the greatest number of people during construction. Therefore, this should be the primary alternative evaluation in the EIS. Alternative recycling programs associated with the facility could also be evaluated. It is possible that alternative resource recovery options could be discussed including the option of electrical generation.

Transportation

A few citizens requested information on truck traffic. Therefore, the EIS could include information on existing roadways, vehicular traffic volumes with and without the plant, haul distances, traffic operations, transportation routes, access routes, construction traffic, and pedestrian traffic. It is assumed that traffic will include trucks needed for refuse delivery, trucks needed for ash disposal and employee vehicles. Citizens seem concerned that the project will result in extensive lines of garbage trucks to and waiting at the facility. Truck traffic needs to be evaluated and put into perspective with existing and projected traffic for the Lake Elmo-Oakdale area. The transportation discussion could also address the concern relating to garbage being dumped along the transportation routes to the facility.

Air Quality/Odor

Air quality is perhaps one of the more important impacts which should be evaluated in the EIS. People are concerned about the type and levels of air pollutants which will come out the stack. It is possible that a discussion regarding the composition of municipal refuse should be provided in this section of the EIS. This evaluation could include the following:

1. Climatological data, ambient air quality data, and information on existing significant point sources.
2. Operating parameters for the facility including emission rates.
3. Five years of sequential air quality data to be modeled. Impacts of EPA criteria pollutants emitted from the proposed facility in significant amounts could be modeled. Quantities of nonsignificant EPA criteria pollutants emitted will be calculated.
4. Information regarding any ongoing air quality monitoring programs for the project.
5. Modeling information can be used to compare against existing state and federal air quality standards.
6. Potential air quality impacts resulting from increased truck traffic associated with the proposed project.
7. Measure to control odors including a review of the effectiveness of odor controls at other resource recovery facilities.

Human Health

A couple of citizens testified on potential human health effects. People are concerned over local exposures to potentially dangerous air contaminants and how air emissions will impact their health. This evaluation can put these impacts into a proper perspective by focusing on overall projected changes in the mortality and morbidity rates for the area. The EIS could include:

1. Available background epidemiological data for the area.
2. Information of exposure pathways.
3. A list of pollutants which may be important to evaluating human health effects.
4. Potential health effects of important pollutants.
5. The effectiveness of alternative mitigating measures for reducing health effects.
6. Survey information on exposure rates developed from other similar resource recovery projects.

Visual

Citizens are concerned over the visual impacts the facility might have and how it may impact residential areas in the area. The facility will have buildings approximately 100 feet tall and a stack which will be approximately 175 feet high. Visual information has been collected on a previous project in the same area. It is anticipated that this computerized data base and other visual information from MLMIS could be used to evaluate potential visual impacts of the project. The EIS could include:

1. Existing visual data for the area.
2. A computerized model could be utilized to evaluate landscape units, and visual corridors, etc.
3. Visual impacts of the existing transmission line.
4. Computerized maps to present existing visual resources and show impacts.

Solid Waste

The proposed resource recovery facility is part of an overall solid waste plan for the counties and metropolitan area. Although the EIS should not attempt to duplicate these efforts, it can incorporate and summarize important information collected in the landfill siting and landfill abatement process. The main goal of this discussion should be to provide an overall perspective and to identify solid waste generated by the facility. The following could be included in the EIS to address citizen comments:

1. Existing regional, county and local solid waste disposal and recycling information including generation rates and facilities.
2. Facility requirements for solid waste processing and disposal.
3. Ash and any other solid waste disposal needs.

Noise

Concern has been expressed that noise for the proposed facility might impact the surrounding area. Industrial facilities have the potential for emitting noise which might impact sensitive receptors. The residential areas within a few miles of the facility should be evaluated for potential impacts. This evaluation should use a state of the art three dimensional noise model to qualify potential impacts. The EIS could include:

1. Available noise data.
2. Background noise monitoring conducted on the Lake Elmo site.
3. Available noise information from other resource recovery facilities.
4. Potential noise sources and noise characteristics including plant facilities and noise from truck traffic.
5. Modeling of potential noise from the facility.
6. Identification of potential areas of impact.
7. Elements of a noise abatement program.

Historical/Archaeological

The Minnesota Historical Society indicated in the siting process the need for a brief archaeological survey to determine the potential presence of important resources. Therefore, the EIS could include:

1. Background information on historical and archaeological resources collected from the Minnesota Historical Society.
2. Results of archaeological survey.

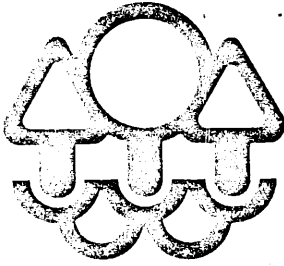
Surface Water Quality and Quantity

Citizens expressed concern over potential water drainage impacts. Therefore, the EIS could include an evaluation of potential surface drainage impacts using available information from the soil conservation service and local watershed district.

Project Description

The EIS should describe the proposed project. This description could include:

1. The location of the proposed facility mapped and described on both community and site specific levels.
2. A site layout prepared showing major equipment and features of the facility.
3. A description of the solid waste combustion process.
4. A list of general specifications for equipment and operation of the facility including utilities, parting requirements, building areas, boiler features, pollution control equipment, refuse quantities to be burned, solid waste residues which will be generated, air emission calculations, and labor requirements.
5. Conceptual diagrams of the proposed facility.
6. The route of the proposed steam line.
7. Steam line characteristics including steam line size (i.e., diameter), condensate line size, and typical depth.



Minnesota Pollution Control Agency

February 16, 1983

Gerald Isaacs, Chairman
Metropolitan Council
Room 300, Metro Square Building
7th & Robert Streets
St. Paul, Minnesota 55101

Dear Mr. Isaacs:

The Minnesota Pollution Control Agency (MPCA) staff has reviewed the environmental assessment worksheet (EAW) for the proposed Ramsey/Washington County Waste to Energy Facility and has several comments to offer on the project for your consideration in the environmental impact statement (EIS) scoping decision. Our comments identify several new issues, in addition to expanding on or clarifying issues identified in the letters to Rick Person of the City of St. Paul dated January 26, 1982, and to Lynn Takemoto of the Metropolitan Council dated September 1, 1982. These letters are attached for your information. Alternatives which should be addressed in the EIS are also presented.

Issues:

1. Material and/or Vegetation Damage. The EIS should contain an evaluation of the potential for material and/or vegetation damage due to the facility for each alternative identified. This evaluation should include a summary of available literature, particularly that describing the experience at other similar refuse burning facilities. At a minimum, possible effects due to fluoride and/or chloride emissions (in particular, HCl emissions) in the immediate vicinity of the facility should be included. If the potential exists for significant damage to vegetation, metals, paint, and other materials near the facility, mitigative measures should be proposed.

2. Health Risk Assessment. The EIS should contain a health risk assessment for all air pollutants of concern, specifically for emissions of trace elements, heavy metals such as cadmium and other hazardous substances including dioxins and other chlorinated hydrocarbons. As a part of this assessment,

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ambient air quality modeling results for these pollutants for each alternative should be included in the EIS. These impacts should be evaluated with regard to their public health risk. Specific reference should be made to the U.S. EPA's studies of large existing waste incinerators and other available health literature for the pollutants of concern. The impact of the mass burn option should be compared with the impacts resulting from existing coal-fired power plants.

3. Odors. The EIS should contain an evaluation of the impact of odors due to hydrocarbons, HCl, and other odoriferous emissions at the plant boundary, and beyond the boundary if this is a problem.

4. Source Separation. Source separation should be evaluated in the EIS. This evaluation should identify current plans by local governmental units for source separation and identify resulting environmental impacts, particularly those for air quality. For instance, ambient air concentrations of lead around the facility could be reduced if newsprint was recycled and emissions of polychlorinated hydrocarbons could be decreased with certain source separation alternatives.

5. Noise. The EIS should contain an evaluation of the noise impact of project related refuse hauling and ash hauling trucks and existing traffic on County Road 70. This impact should be calculated for the closest nearby sensitive receptor, particularly for residences located along County Road 70 and compared to the state noise standards NPC-1 and NPC-2. Noise impacts of plant operation on the planned surrounding commercial and industrial land uses should also be evaluated and compared to the state noise standards. If noise standard violations will occur, mitigative measures such as installing temporary or permanent noise barriers, requiring the use of properly muffled equipment, limiting the hours when waste will be accepted to weekday, daytime hours, and requiring the routing of truck traffic to avoid an adverse impact on sensitive receptors should be evaluated.

6. Ash. The EIS should contain a description of the chemical characteristics of the fly ash and bottom ash (and mixtures of the two types of ash) resulting from refuse incineration. In particular, specific information about resource recovery ash from the Minnesota experience (Red Wing and St. John's University facilities) should be included in the EIS.

Also, it has been found that mixtures of bottom ash and fly ash may be hazardous as determined by the extraction procedure toxicity leach test and the water leach test. Information on this will be issued in March, 1983 in a report about ash from the mass burn plant at Saugus, Massachusetts. Contact John Griffin of the Bureau of Solid Waste Disposal, Massachusetts Department of Environmental Management, at 617/727-4293, for further information. The EIS should discuss the feasibility of combining the two types of

ash. It is possible that the ash types may have to be kept separate at the facility as well as at the disposal site due to the possible hazardous nature of the mixture of the two ash types.

Approval must be obtained from the MPCA's Division of Solid and Hazardous Waste for co-disposal of any material such as incinerator ash considered to be a nonhazardous industrial waste. The request for approval must contain a chemical evaluation of the waste. The Division of Solid and Hazardous Waste must approve the disposal location, whether it be on-site or at an approved landfill. As has been stated in our letter of January 26, 1982, the EIS must allow for a reasonably certain determination that these approvals will be possible.

7. Water Quality. The water quality of the wastewater before and after pretreatment should be described and analyzed, together with treatment alternatives. A comparison of the effluent quality from the various alternatives with the pretreatment standards should be made. Potential surface water impacts from runoff should be examined including expected levels of treatment and water quality. The EIS should explore the need for and feasibility of more than one retention pond and spill control devices.

Finally, in the listing of required permits, the Corps of Engineers 404 permit is listed. It should be noted that MPCA 401 certification of the 404 permit would also be required.

8. Steam-line Route. Both immediate and long-term impacts of the steam-line should be evaluated, especially with regard to the wetland lying to the west of the site. Costs of rerouting the line to the nearest road right-of-way should be evaluated in light of the impacts upon the wetland. Since dewatering would be required, erosion, sedimentation, and dewatering water drainage issues should also be evaluated.

Alternatives:

1. Air Quality Controls. The environmental impacts (air quality, water quality and solid and hazardous waste impacts) and feasibility of all potential air quality control technology alternatives should be discussed in the EIS. The potential air quality control technology options should include:

- a) electrostatic precipitator,
- b) fabric filter,
- c) combination of dry scrubber and fabric filter,
- d) combination of mechanical air pollution control equipment and fabric filter,
- e) combination of dry scrubber and electrostatic precipitator.

Gerald Isaacs
February 16, 1983
page 4

Any other control technologies which have been used at mass burning facilities in the United States or world-wide should also be considered.

The EIS should describe the degree of air quality impact associated with each option. If possible, air quality modeling results should be included. In addition, the EIS should present alternative plans for control of air emissions in the event of failure of the proposed air quality control equipment.

2. Other Disposal Alternatives. The EIS should discuss the landfilling alternative and compare impacts and feasibility of this alternative to the proposed mass burn option.

Non-mass burn alternatives including the refuse derived fuel option, materials recovery options and potential source separation options should be discussed in the EIS.

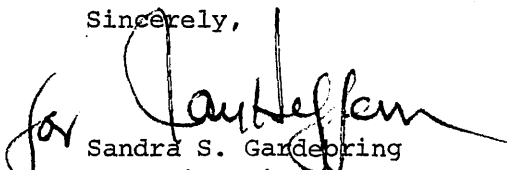
For instance, separation and baling of corrugated materials could occur at the facility, given appropriate tipping floor design. These materials could be separated at the household level with trash haulers dropping them off at recycling centers. Trash haulers could be required to separate materials to be able to use the proposed facility. Also, leaf composting sites could be provided at the facility.

The only non-mass burn option, a materials recovery option, mentioned in the EAW on page 4 is the possible extraction of ferrous materials from the ash by magnetic separation, if desired. All options would have to be incorporated into the plant design at an early stage. Source separation and materials recovery options would result in the need for less landfill space for incinerator ash and may slightly enhance project economics.

Alternatives to the land disposal of ash should also be discussed such as the potential use of the ash in roadway paving materials and for roadway beds.

Thank you for the opportunity to provide input to the scoping of the Ramsey/Washington County Waste to Energy Facility EIS. My staff is available to discuss any of the above issues with your staff. Please have your staff contact Deborah Pile, Environmental Review Coordinator, at 296-7216.

Sincerely,

for Sandra S. Gardebring
Executive Director

cc: EQB



January 26, 1982

Richard Person
600 City Hall Annex
25 East Fourth Street
St. Paul, Minnesota 55102

Dear Rich:

Thank you for meeting with us to discuss the proposed St. Paul/Ramsey County resource recovery facility. The staff of the Office of Planning and Review has discussed the project and has identified the following issues which should be addressed in the environmental impact statement.

1. Nature and quantities of ash.

Some studies have been done of resource recovery ash. If, however, these are insufficient, ash from existing facilities should be obtained and subjected to leach tests.

2. Disposal site(s) for ash and suitability of the sites for ash disposal.

The site(s) will need to be permitted and disposal of the ash in them authorized. The environmental review documents must allow for a reasonably certain determination that these approvals will be possible.

3. Toxic end products.

The DEIS should address the dioxin issue. The staff is concerned that the refuse burned by the resource recovery facility not contain PVC, chlorophenols, chlorobenzenes, PCB's and herbicides such as 2,4,5T, 2,4,5D or similar compounds which when pyrolyzed or combusted can produce polychlorinated dibenzofurans (PCDF's) and dibenzo-p-dioxins (PCDD's).

In one study by Lustenhower, Olie and Hutzinger, the flyash of 35 municipal incinerators contained PCDD's and PCDF's as well as several chlorobenzenes in ppb (up to 1 ppm) amounts. PCDD's and PCDF's include compounds such as TCDD, a dioxin, which is one of the most toxic low molecular weight substances known to man. Moreover, TCDD tends to accumulate in the body since the compound is metabolized very slowly in biological systems.

This issue should be addressed in the draft EIS even though the precursor compounds of PCDD and PCDF (PVC, PCB's, etc.) are not normally present in significant amounts in municipal refuse. In the study by Lustenhower et al., the total amount of 2,3,7,8 TCDD per normal cubic meter of flue gas from municipal incinerators in the Netherlands was approximately 2 nanograms; the significance of this amount should be addressed in the DEIS.

It was also found that each municipal incinerator's emissions will vary depending on the specific mix of refuse burned, its moisture content, and the combustion conditions, e.g., the temperature of incineration and the degree of mixing of the fuel, air and combustion products. A description of the specific combustion process to be used, type of refuse expected to be burned, and an estimate of the possible amount of these toxic end products should be included in the DEIS.

At present, the control of toxic or hazardous emissions from stationary sources under the Clean Air Act does not include PCDF's and PCDD's. However, the EPA intends to use the authority under RCRA to set emission limits for hazardous pollutants from hazardous waste incinerators; the non-hazardous incinerator, e.g., municipal incinerator, will not be regulated under RCRA.

4. Heavy metals.

The DEIS should also include a discussion of heavy metals emissions expected from burning the municipal refuse.

5. Operational noise.

The staff is concerned that residences located close to the facility may be affected by noise levels above the state standards (65 dBA for daytime hours, 0700-2200; and of 55 dBA for nighttime hours, 2200-0700) due to the packer and transfer truck traffic. A noise assessment should be conducted for residences located near the refuse delivery route. The distances from the facility and haul roads to the sensitive receptors in the area should be identified.

If the state standards will be violated, mitigative measures should be implemented or preferably, trucks should be routed away from these residences.

6. Construction noise.

The DEIS should also describe measures which will be used to mitigate the noise impact at residences adversely affected by construction activities. If the distance from the construction activity to a sensitive receptor is not sufficient to provide for attenuation of the noise to levels below the state standards, other mitigative measures will have to be described and implemented.

7. Fugitive dust.

The staff is concerned about fugitive dust emission which will be generated by the project, particularly if residences will be affected. Dust will result during the construction phase and, once the plant is operating, from the truck traffic, particularly if unpaved roads are used.

The Twin Cities seven county metropolitan area is a particulate nonattainment area and fugitive dust emissions must be controlled by measures such as watering, sweeping, etc., where appropriate. Refer to the attached outline by MnDOT which identifies activities and measures which can be implemented for dust control.

8. Process Emissions.

Presently the entire seven county metropolitan area is designated as not attaining federal ambient air quality standards for sulfur dioxide and particulate. The Division of Air Quality, however, has hired a consultant to review the designation and to redraw the boundaries of the nonattainment areas for both of these pollutants. The proposal should be ready in the early part of 1982.

Air quality requirements for the facility would differ depending on how the Twin Cities area is redesignated for these pollutants.

After the redesignation, it is likely that the present site search area for the resource recovery facility (about one and one-half miles around the 3M Corporate headquarters) will be located in a nonattainment area for particulate (either primary or secondary) and in an attainment area for SO₂ (and NO_x).

The facility as now proposed (with air pollution control equipment consisting of a three-stage, high efficiency electrostatic precipitator for removal of particulate) will burn 600 tons per day of refuse and emit about 90 tons per year of particulate, about 200 tons per year of sulfur dioxide, and about 200 tons per year of nitrogen oxides. With these emissions, the facility located in an attainment area for SO₂ and NO_x would qualify as a new major source of sulfur dioxide and nitrogen oxides, and would have to undergo PSD review for these two pollutants (the new facility -- as a municipal incinerator capable of charging 250 tons or more per day of refuse -- must undergo PSD review if 100 tons per year of a criteria pollutant is emitted).

The facility, as proposed, would not qualify as a major source of particulate under the offset rule, e.g., offsets would not be required for the particulate emitted by the facility. If the facility were to emit 100 tons per year of particulate, for example if different, less efficient, TSP control equipment were installed, then it would be subject to the offset rule.

In summary, the facility as now proposed would require PSD review for the sulfur dioxide and nitrogen oxide emissions but would not be subject to offset requirements for particulate (given sulfur dioxide redesignation to attainment).

Richard Person
January 26, 1982
Page Five

9. Human Health Impacts.

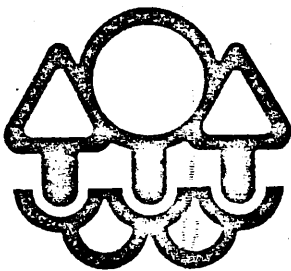
The DEIS should contain a section specifically addressing human health impacts, including vermin control, associated with this type of facility.

We are very interested in obtaining more information on the project as it develops and will be happy to offer what assistance we can.

Sincerely,

Deborah R. Pile
Environmental Review Coordinator
Office of Planning and Review

cc: Laura Oatman, Health Department



Minnesota Pollution Control Agency

September 1, 1982

Ms. Lynn Takemoto
Metropolitan Council
Room 300, Metro Square Building
7th & Robert Streets
St. Paul, Minnesota 55101

Dear Ms. Takemoto:

I am writing concerning the environmental impact statement (EIS) that the Metropolitan Council will be preparing on the Ramsey/Washington County Waste to Energy Project. Minnesota Pollution Control Agency (MPCA) staff, in a letter to Rick Person of the City of St. Paul dated January 26, 1982, provided comments on significant environmental concerns which should be addressed in the EIS. Since our preliminary review, we have discussed the project and identified additional concerns in the areas of air quality, noise, water quality, and solid and hazardous waste management.

New Source Review

As was stated in the January 26, 1982 letter, the entire Twin Cities seven county metropolitan area is currently designated as not attaining the National Ambient Air Quality Standards (NAAQS) for sulfur dioxide and particulate matter. The seven county area is also currently designated as not attaining the carbon monoxide NAAQS.

Barring changes in the federal Clean Air Act, it is expected that by the time the project proposers apply for an air quality installation permit, the area containing the project site in Lake Elmo will be designated as an attainment area for the particulate matter and sulfur dioxide (and NO_x) NAAQS. However, no change in the carbon monoxide designation status is expected. As such, the facility would be subject to the offset rule for CO emissions if the controlled CO emissions were greater than 100 tons per year. However, because the facility is a steam generator that will burn municipal waste, it would qualify for a partial exemption from the offset rule--the reduction in

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the amount of offsetting emission reductions required would be proportional to the percentage heat input due to the garbage burned. To qualify for this partial exemption, special conditions such as making reasonable progress toward attainment must be met. The facility as now proposed may emit about 250 TPY of CO, thus an offsetting emission reduction would have to be found.

Incinerators with charging rates in excess of 50 tons per day are subject to federal New Source Performance Standards (NSPS) as set forth in CFR Title 40 Part 60, Subpart E. Therefore, under the Prevention of Significant Deterioration rule for attainment areas, the facility would be considered to be a major source if controlled emissions of 100 tons per year of a criteria pollutant are to be emitted. Emissions from the facility as currently proposed are over this threshold for SO₂ and NO_x emissions.

If the facility is classified as a major source under the Prevention of Significant Deterioration rule, ambient modelling and/or preconstruction monitoring or stack monitoring may be required for pollutants with significant emission rates. These pollutants may include carbon monoxide, NO_x, SO₂, particulate matter, lead, beryllium and mercury. The staff will also recommend that dioxin emissions be monitored and/or modelled because of their toxicity..

Trace Element Emissions

Page 8.6 of the site report presents trace element emissions from resource recovery facilities (mg/sec) located in the United States. It is not clear from the text of the report whether these emissions result before or after control. The EIS should clarify this and also describe other relevant operating parameters for these facilities, such as the type of air pollution control equipment used, the temperature of incineration, etc. Our staff has used the data from the McKay Bay plant which is approximately the same size as the proposed resource recovery facility for a rough approximation of stack concentrations of trace element emissions from the proposed facility.

Exclusion of Hazardous, Radioactive, or Toxic Wastes

The EIS must identify safeguards to be implemented to prevent the possibility that significant quantities of hazardous, radioactive or toxic wastes would be burned at the facility. Control could be exercised at the generation points or at the facility itself. A plan should be presented in the EIS for exclusion of these waste streams from the refuse to be burned at the plant. It should also describe existing rules or regulations (National Emission Standards for Hazardous Air Pollutants, solid and hazardous waste rules) which may apply.

From an air quality perspective, the pollutant which is subject to Section 112 of the Clean Air Act (National Emission Standards for Hazardous Air Pollutants) for this facility is beryllium.

The beryllium standard of 10 grams/day or .004 tons/year (or of $0.01 \mu\text{g}/\text{m}^3$ averaged over a 30-day period) applies to incinerators which process beryllium-containing waste. Beryllium-containing waste means material contaminated with beryllium and/or beryllium compounds used or generated during any process or operation performed by extraction plants, ceramic plants, foundries, incinerators and propellant plants which process beryllium ore, beryllium, beryllium oxide, beryllium alloys (or beryllium-containing waste). Two such facilities exist in the Twin Cities Metropolitan Area: Hitchcock Industries in Bloomington and Rausch Manufacturing in St. Paul. Since Bloomington is in Hennepin County, waste from Hitchcock Industries would not enter the waste stream for the proposed plant; however, waste from Rausch Manufacturing must not be allowed to be burned at the proposed facility or National Emission Standards for Hazardous Air Pollutants limitations would apply.

We are also concerned that waste containing significant amounts of mercury, arsenic, lead, chromium and cadmium may be burned at the facility. It appears from the trace element emissions table on page 8.6 of the site report that the amount of these emissions could be significant from this facility. Finally, the staff is also concerned that radioactive and hospital wastes will be burned at the facility. Significant sources of waste containing these trace elements or radioactive materials should be identified in the EIS, as well as ways that this waste will be excluded from the waste stream which will be burned at the proposed facility.

Odor Impacts

The enclosure of the tipping area and use of the indoor storage pit air as combustion air and burning the refuse at a sufficiently high temperature will reduce the amount of odor from the facility. Odors could also, however, result from truck spillage of the refuse. The EIS should address the odor issue in detail.

Noise Impacts

Background noise levels should be assessed. A noise survey should be conducted of the area surrounding the site and separate measurements made for weekdays and weekends. The impact of noise due to internal operations, e.g., due to electric motors, cranes, pumps, fans, etc., should be assessed. The EIS should contain a description of the equipment to be used, its noise levels, and impact, if any, on nearby sensitive receptors. Also, noise from outdoor noise sources including refuse delivery trucks, trucks to be used for the transfer of recovered materials and ash, employee cars, supply trucks, and steam valves and lines should be evaluated. If the state noise standards are to be exceeded at nearby sensitive receptors, mitigative measures would have to be implemented.

Noise due to the refuse delivery trucks could be alleviated by proper scheduling (to prevent backup of trucks at the facility), curfews or by construction of a new exit on the I-494 freeway. Surrounding local communities can pass legislation (axle weight limitations) to limit truck traffic in their areas. The environmental impact of the refuse transfer station alternative should also be evaluated.

Lynn Takemoto
page 4 - Sept. 1, 1982

Public Health Concerns

If for some reason the storage capacity of the facility were to become overloaded, alternatives such as diversion of the refuse to a landfill must be implemented. The EIS should explore such options.

Water Quality Concerns

The facility is required to have a pretreatment system and to obtain a permit from the Metropolitan Waste Control Commission. The EIS must include a discussion about alternative types of pretreatment systems and describe the characteristics of effluent from these systems.

The EIS must describe the erosion control measures to be used during construction.

The EIS must describe the surface water runoff control measures to be used after the facility is completed.

If my staff can be of assistance to you in any way, please contact Marlene Voita of my staff (296-7392) or me. Ms. Voita will be the lead person for coordination of the Agency's input on this project.

Sincerely,

Deborah R. Pile

Deborah R. Pile
Environmental Review Coordinator
Office of Planning & Review

DRP:es

cc: Marlene Voita



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ROUTING

Admin. _____
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3 February 1983

FEB 8 1983

Mr. Gerald J. Isaacs, Chairman
Metropolitan Council
300 Metro Square Building
7th Street and Robert Street
St. Paul, Minnesota 55101

For your information ✓
Take appropriate action _____
Please reply _____
Prepare reply for Chmn sig _____

Dear Mr. Isaacs:

RE: Waste-to-Energy Project
Ramsey/Washington Counties, MN

MHS Referral File Number: 0-615
(PLEASE REFER TO THIS NUMBER IN
ALL FUTURE CORRESPONDENCE)

Thank you for the copy of the EAW on the above referenced project. This Worksheet accurately depicts the conclusions and recommendations of the Minnesota State Historic Preservation Office as shown on page 5 of the EAW.

We look forward to working on this project with you and will provide you with assistance to the extent our resources allow.

Thank you again for your participation in this important effort to preserve Minnesota's heritage.

Sincerely,

Dennis A. Gunkel
Russell W. Fridley
State Historic Preservation Officer



City of Lake Elmo

777-5510

3880 Laverne Avenue North / Lake Elmo, Minnesota 55042

COMMENTS PRESENTED TO PUBLIC MEETING ON RAMSEY/WASHINGTON COUNTY
WASTE TO ENERGY PROJECT; February 10, 1983; Tartan High School

Good evening. Thank you for the opportunity to present our concerns and suggestions on areas that the Environmental Impact Statement for the Ramsey/Washington County Waste to Energy Project should address. We appreciate the cooperation of the two Counties and the Metropolitan Council in considering our concerns.

In addition to the concerns raised by the City Engineer (Larry Bohrer, TKDA) and the City Planner (Robert Chelseth, Planning and Development Services, Inc.), which we have submitted to you in written form, the City of Lake Elmo raises the following issues and requests that they be considered in the EIS:

The Environmental Assessment Worksheet, in item 8, page 1, describes the total project area as 20 acres. The City of Lake Elmo is deeply concerned about this proposed total size and by what appears to be a too-limited over-all view of the impact on the surrounding area. We believe it is essential to study the impact this plant will have on City facilities and services in all of Section 32 and the western one-third of Section 33 - the area that is naturally tributary to and a part of the site for the Energy Plant. We are most concerned about:

SURFACE WATER The entire sub-watershed that this Plant will affect should be studied as there are presently no provisions to store surface water upstream; and, the nearest storm sewer is in the Southwest corner of Section 32 - and is needed to handle the overflow run-off from all of Section 32. In effect, a surface water management plan for the sub-watershed should be developed and approved by the Watershed Districts, the Soil and Water Conservation District, and the City of Lake Elmo. The Battle Creek plan and the City's Wetlands study may prove of some assistance in this study. I will leave a copy of the Wetland study with you tonight. The Battle Creek plan is available from the Ramsey-Washington Metro Watershed District.

SANITARY SEWER All of the potentially tributary area for sanitary sewer should also be studied, as - with surface water - there is no over-all sewer plan and there is only one outlet, which has to serve all of Section 32. The pipe serving the plant should be located, sized, and constructed to complement future connections in the area between the Plant and the present sewer, in the Southwest corner of Section 32. The City wants to avoid maintaining two systems - one for the Plant and one for adjacent property.

Comments, Waste to Energy Project
EIS Scope
City of Lake Elmo
page two

WATER The need for a public water supply for the whole area
SUPPLY should be addressed; so that we don't end up with two
 water systems either. It will be cheaper to plan for
and build one system serving Section 32 now than to build one to
serve the Plant only and the area later.

SERVICES The EIS should consider the impact this Plant will have
 on other City services. It should address our increased
costs for police, fire, and street maintenance services. Revenues,
whether real estate taxes or other, must be adequate to cover the
costs of the additional services the Plant will demand. With
little population or development in Section 32, the whole range of
City services will be new...and a long way from areas where we
now provide services.

The City of Lake Elmo is also concerned that the limited site
proposed in the EIS might unfairly and improperly diminish the
value of adjacent property. We believe consideration should be
given to the following two points:

BUFFERING Either a new, adequate access to the balance of the
 Brockman property should be built with the Plant - or
all of the Brockman property should be purchased. The current
20 acre site takes the only access to the Brockman property and
leaves them with the less desirable land for development. This
land could, if acquired, provide for a more adequate buffer from
visual and noise pollution - and would provide an area to control
surface water run-off from the plant and road realignment.

ADJACENT The County should also consider the impact on all
PROPERTY adjacent land - in Oakdale and Lake Elmo. The Dreher
 property, now primarily residential, would no longer
be attractive for residential use. Nearly all the truck traffic
would travel in front of and alongside this home. The property
will be greatly depreciated for its present use; and, perhaps, the
Counties should consider acquiring this too.

Finally, we believe the EIS should address:

RESOURCE The EIS should address the recovery of, at least,
RECOVERY ferrous metals - before or after incineration. And,

RESIDUE The EIS should address the storage, removal, and trans-
 port of ash from the plant to a landfill - including
the potential frequency of removal, spillage, and heavy metal content.

Mayor Eder could not be here tonight; but, asked me to share these
concerns with you; and to thank you for the opportunity to comment
on the scope of the EIS, at this time. We have appreciated the
cooperation of the Counties to date, on this project, and we look
forward to resolution of these concerns and completion of the project.

Thank you.

Laurence E. Whittaker, City Administrator

PLANNING AND DEVELOPMENT SERVICES, INC.

529 South Seventh Street Suite 535 Minneapolis, MN 55415 612-332-4166

JAN 19 1983

January 18, 1983

Larry Whittaker, Administrator
City Hall
Lake Elmo, Minnesota 55042

SUBJECT: Review and comment on the Environmental Assessment Worksheet prepared by the Metropolitan Council for the Waste-to-Energy Project (January 1983).

This preliminary review focuses on the accuracy of the contents of the EAW, as well as highlighting areas where emphasis should be placed during the preparation of the Environmental Impact Statement (EIS).

Page 1; Item #12b. The project is inconsistent with the adopted city land use plan, which currently has this site planned for "Urban Mixed" use. Because of the lack of information on public sewer and major highway plans, this site and the surrounding area in section 32 were placed in a general, catch-all, district anticipating a mix of future forms of urbanization. In response to this project proposal, more detailed land use plans are being prepared for the area. Because this is a relatively unique land use, careful consideration must be given to the most appropriate forms of land use that will be best suited for the surrounding area.

Page 1; Item #12. Consistency with Ramsey-Washington County Wasteshed District plans should be addressed under this item or #19 during the preparation of the EIS.

Page 2; Item #13. A pipeline easement parallels the western boundary of the site. This may affect expansion plans and the right-of-way planned for the steamline.

Page 2; Items #15, #16, and #17. Given sandy soils with pockets of muck, and a groundwater table averaging ten feet, the site preparation work necessary to construct a large industrial building and stack should be detailed and closely examined in the EIS.

Page 2; Item #19. The relocation of Helmo Avenue, the installation of public water and sewer lines, and the development of nearby property that is likely to occur as a result of the construction of this facility will all combine to change the existing natural surface water system. A detailed analysis of these potential impacts should be part of the EIS, including alternatives for surface water management.

Page 3; Item #22. It is not clear why an individual (on-site) system is identified as part of the project's waste water treatment facilities. This point should be clarified to identify the location and function of any on-site treatment facility planned.

Larry Whittaker
Page Two
January 18, 1983

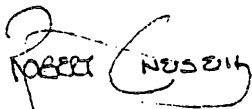
Page 3; Item #24. In the interest of exploring all possible impacts, the issue of potential odors generated by the project should still be examined under the EIS. In addition to the plant operation itself, there are concerns over the trucking and handling of wastes as they pass to and from the site.

Page 4; Item #25. The issue of where and how will hazardous and pathogenic wastes inadvertently received at the facility be stored and removed from the site should be addressed in the EIS.

Page 6; Item #29. Although the overall increase in the average number of trips per day is projected to be 16-20 percent, consideration should be given to the fact that two-thirds of these vehicles will be heavy trucks.. The resulting impacts from noise, road maintenance, etc., should be addressed as part of the EIS. This may influence decisions on selecting adjacent land uses, as well as road designs.

Finally, on Page 6, the last paragraph notes that the EIS must address impacts associated with the possible future development of adjacent lands. This is a key item in terms of the city's planning, managing and serving the growth which may result from the development of plant. The EIS should address the costs/benefits of added employment, tax base and population growth with expected costs for municipal utilities, services and public improvements. Obviously, a development of this magnitude carries both opportunities and risks with it. A thorough analysis and discussion of these points now may eliminate a breakdown in the process as the project progresses.

Sincerely,

A handwritten signature in dark ink, appearing to read "Robert Chelseth". The signature is stylized with a large, looping "C" and "H".

Robert Chelseth
Principal Planner

klw

January 13, 1983

Mr. Larry Whittaker
City Administrator
PO Box J
Lake Elmo, Minnesota 55042

Re: Environmental Assessment Worksheet
Waste-to-Energy Plant
Lake Elmo, Minnesota
Commission No. 7113-82

Dear Mr. Whittaker:

An Environmental Assessment Worksheet (EAW) has been prepared for the proposed Waste-to-Energy Plant and has been submitted to the Environmental Quality Board (EQB) and Metropolitan Council. An Environmental Impact Statement (EIS) is required for an incinerator of this size; therefore, the EAW will be used to identify issues needing more study in the EIS. We have reviewed the engineering features of the EAW and our comments are listed below. Our comments are numbered to correspond to the EAW numbered questions.

12. The EAW states the future land use for the site is "Public Facility". This is a misinterpretation of Map 24 in the Lake Elmo Comprehensive Plan. The future land use is "Urban Mixed".
14. The site contains two wetlands identified as Wetland No. 32-4 (Type IV) and Wetland No. 32-5 (Type III) in the "Lake Elmo Water Resources Inventory" dated September 1982 and prepared by the Washington Soil and Water Conservation District. The wetlands comprise a total of 2.2 acres or 10% of the 20 acre site.
22. Estimated wastewater flows of 0.02 mgd from the facility appear to be consistent with the very preliminary sewer capacity study done to date.

Mr. Larry Whittaker
January 13, 1983
Page Two

29. The EAW states that the access to the site will be from I-694 to CSAH 70, then CSAH 70 to Helmo Avenue. We recommend that the EIS also address how many trucks may come from the east from I-94 to CSAH 13, then CSAH 13 to North Frontage Road, and North Frontage Road to Helmo Avenue. This projection of truck traffic is necessary to analyze the adequacy of North Frontage Road.

The Metro Council will hold a public hearing in early February to obtain public testimony as to the correctness or completeness of the statements in the EAW. We recommend that the above comments be forwarded to the Metro Council at that time.

Sincerely yours,

TOLTZ, KING, DUVAÏL, ANDERSON
AND ASSOCIATES, INCORPORATED

Larry D. Bohrer, P.E.

LDB:j



United States Department of the Interior

FISH AND WILDLIFE SERVICE
St. Paul Field Office, Ecological Services
570 Nalpak Building
333 Sibley Street
St. Paul, Minnesota 55101

IN REPLY REFER TO:

February 4, 1983

Ms. Karen Harrington
Metropolitan Council
Suite 300 Metro Square Building
St. Paul, Minnesota 55101

Dear Ms. Harrington:

This responds to your request for our review of the environmental assessment worksheet for the Ramsey/Washington County Waste-to-Energy Project.

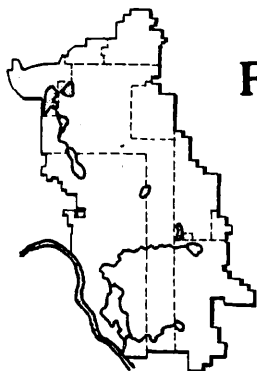
Our only concern at this stage relates to the possible impacts of constructing the steamline through the cattail marsh directly west of the project site. The worksheet does not discuss the details of steamline construction; however, we suspect that it would be buried to minimize heat loss. If constructed underground through the wetland, the line could cause dewatering of the basin. This possibility would depend on construction methods, the nature of the bottom sediments, and the underlying soil types. Additionally, the line may require an access road for maintenance purposes that would cause adverse impacts to the wetland if filling is required. We suggest that, if at all possible, these potential impacts be avoided by routing the steamline around this wetland.

Thank you for the opportunity to comment on this document.

Sincerely,

Richard F. Berry
Field Office Supervisor

cc: MDNR, St. Paul (Jon Parker)



Ramsey-Washington Metro Watershed District

985 Ruth Street St. Paul, Minnesota 55119

FEBRUARY 17, 1983

KAREN HARRINGTON
METROPOLITAN COUNCIL
ENVIRONMENTAL PLANNING DIVISION
300 METRO SQUARE BLDG.
ST. PAUL, MN 55101

DEAR MS. HARRINGTON:

I HAVE REVIEWED THE EAW FOR THE PROPOSED RAMSEY-WASHINGTON WAST-TO-ENERGY FACILITY IN THE CITY OF LAKE ELMO. THIS PROPOSED FACILITY IS WITHIN OUR WATERSHED DISTRICT AND WOULD BE OF CONCERN TO THE BOARD OF MANAGERS. I WOULD LIKE TO TAKE THIS OPPORTUNITY TO MAKE SEVERAL COMMENTS.

THE PROJECT IS WITHIN THE BATTLE CREEK DRAINAGE BASIN. OUR CURRENT CONSTRUCTION PROJECT TO IMPROVE BATTLE CREEK AND STABILIZE THE EROSION SITUATION IS BASED UPON A WATER MANAGEMENT PLAN FOR THIS AREA. THIS PLAN ASSUMES A LOW DENSITY RESIDENTIAL DEVELOPMENT PATTERN FOR THIS SITE. BECAUSE THIS FACILITY WOULD INVOLVE INDUSTRIAL CHARACTER DEVELOPMENT AND LARGE AREAS OF IMPERVIOUS SURFACES, WE WOULD HAVE TO REQUIRE STORM WATER STORAGE OF A GREATER MAGNITUDE THAN INDICATED IN OUR BATTLE CREEK MANAGEMENT PLAN. THE LARGE WETLAND ON THE SOUTHERN PORTION OF THE SITE IS IDENTIFIED TO SUPPLY 51 ACRE FEET OF STORAGE. THIS WILL, IN ALL LIKELIHOOD, HAVE TO BE INCREASED IF THIS FACILITY IS CONSTRUCTED.

IN GENERAL, I WOULD CONCUR WITH THE REQUEST OF LARRY WHITACKER, CITY MANAGER FOR THE CITY OF LAKE ELMO, THAT A DETAILED STORM WATER MANAGEMENT PLAN SHOULD BE DEVELOPED FOR THE AREA. THIS PLAN COULD EVALUATE THE ISSUE IDENTIFIED ABOVE AS WELL AS ADDRESS THE LOCAL DRAINAGE ISSUES FACING THE CITY OF LAKE ELMO.

AS A FINAL COMMENT, THE PROJECT WOULD REQUIRE A PERMIT FROM THE WATERSHED DISTRICT, SINCE IT INVOLVES BOTH THE ALTERATION OF WETLAND AREAS AND INVOLVES GRADING OF GREATER THAN ONE ACRE OF LAND.

THANK YOU FOR THE OPPORTUNITY TO COMMENT AND REVIEW THE EAW. FEEL FREE TO CONTACT ME AT ANY TIME DURING THE PREPARATION OF THE EIS IF THERE IS ANY INFORMATION WE COULD PROVIDE TO ASSIST YOU OR YOUR CONSULTANTS.

SINCERELY,

CLIFTON AICHINGER,
ADMINISTRATOR

Jan 26 1983

Dear Sir,.

In regard to the Brockman property,
we would be in favor of selling all
our property on Minnehaha street
and Helm Ave.

We are not in favor of selling
any parcel or portion that would
land lock any of our property.

yours truly,
Eileen Brockman Campbell
Harry Brockman

13633 Greenwood Trail
Stillwater, Minn. 55082
February 8, 1983

Mr. A.B. Schaefer, Jr., Chairman
Washington County Board
6660 Manning Avenue No.
Stillwater, Minn. 55082

Dear Artie:

As you know, my name is Mrs. Dorothy Brockman and I am representing the Brockman family who owns approximately fifty acres of property on the east side of Highway #694 and south of Tenth Street (also known as Minnehaha Avenue).

No one has officially contacted us but from all indications on maps we have seen it would appear the energy plant will be constructed on the five acres we own bordering Helmo Avenue. Should this occur it would then landlock our forty-five acres to the west along Highway #694. The problem of landlocking such valuable land along a major highway and interchange is of great concern to us and should be addressed.

In all the reports we have seen this project is designated for a 20 acre site. Yet when I called Mr. C.A. Reibel on Wednesday, January 26, 1983, for some information, I expressed our concern about landlocked property. His statement to me was the project ^{may} take all of our property. This would then involve more than 20 acres. Just how many acres are involved in the project? Is only five acres of our property going to be taken and landlock the rest? It is the Brockman family's contention that inasmuch as so much damage will be done to our property such as no access, devaluation of the remaining property, noise, truck traffic, etc. that all of the property should be taken.

I would like to go back a number of years. When Highway #694 was built our land, which has been in the Brockman family for many years, was cut in half and our access to the east side virtually cut off. In order to protect our property we had to go out on the open market and to considerable expense purchase five acres fronting Helmo Avenue. Now we are faced with the same dilemma.

page 2

2-8-83

Mr. A.B. Schaefer

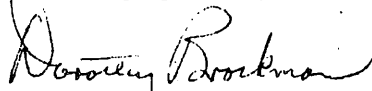
I would like to interject here also that when the interchange was built for Highway #694 and Minnehaha it was only half an interchange. When the State of Minnesota decided to correct this they claimed they had no funds for the purchase of land. We had to donate approximately 5½ acres of land without any reimbursement.

We feel the time has come when:

- (1) someone should officially notify us that our property is involved
- (2) isn't it time for someone to level with us what the total use is intended for our property.

We have a great deal at stake here and we are very concerned. Thank you.

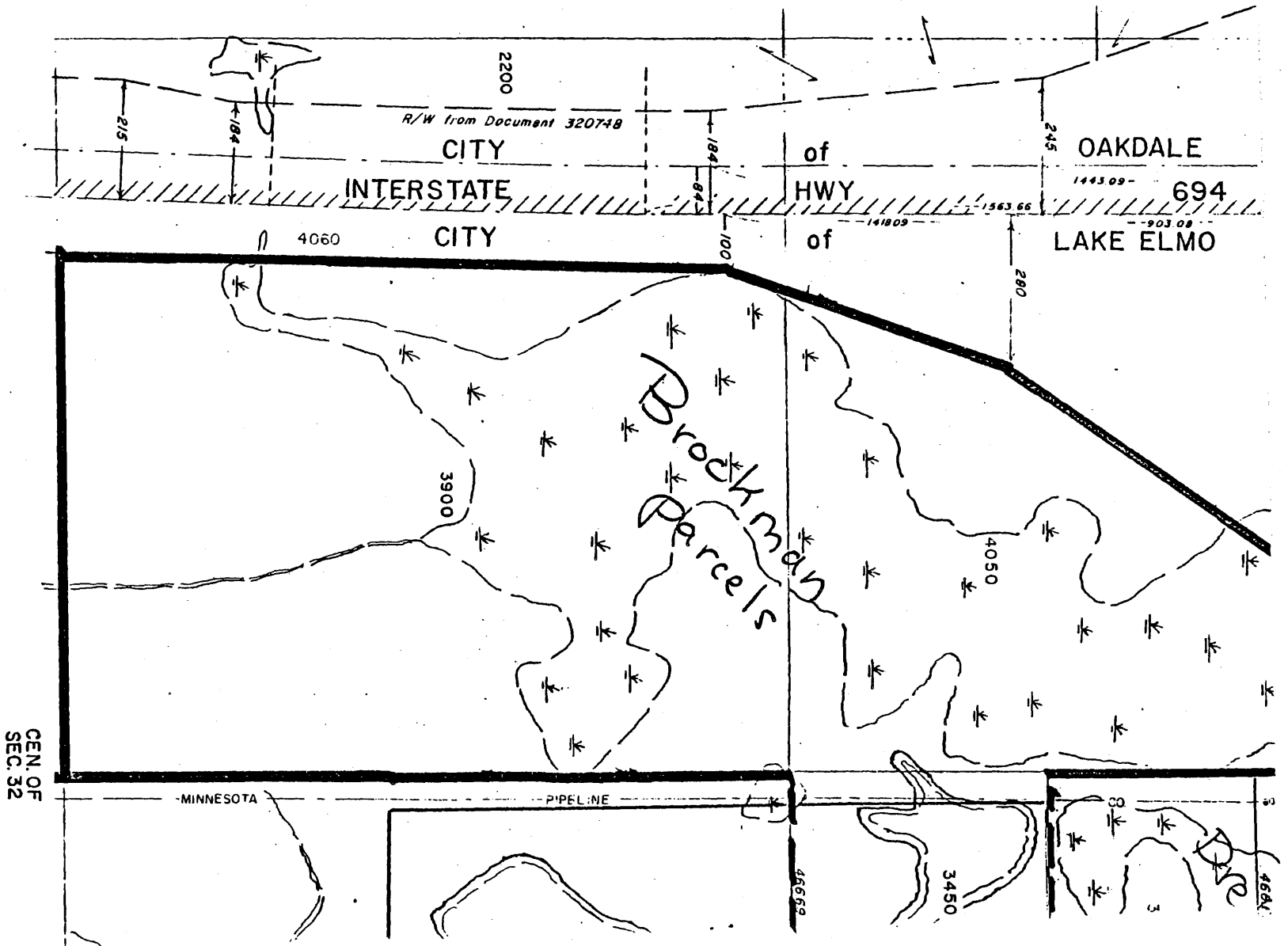
Sincerely yours,



(Mrs.) Dorothy Brockman

cc: Mr. C.A. Reibel

AST IRON MONUMENT





City of Lake Elmo

777-5510

3880 Laverne Avenue North / Lake Elmo, Minnesota 55042

February 18, 1983

ROUTING

Admin. _____
P. R. _____
H. R. _____
CS/PIO _____

FEB 22 1983

Mr. Gerald J. Isaacs, Chairman
Metropolitan Council
300 Metro Square Building
7th & Robert Streets
St. Paul, Minnesota 55101

For your information _____
Take appropriate action _____
Please reply _____
Prepare reply for Chmn sig _____

Re: EIS for Ramsey/Washington County Waste/Energy Project

Dear Mr. Isaacs:

Although the deadline for scoping the EIS on this project has passed, the City of Lake Elmo would like to raise one additional concern. This concern relates to a goal and responsibility that the Metropolitan Council already shares with us.

The City of Lake Elmo is concerned that projects such as this Waste/Energy Plant may discourage efforts at waste abatement. Therefore, we urge that the Metropolitan Council specifically address the need for continued serious efforts at waste abatement in the EIS for this project.

We believe that waste abatement should be encouraged not only to recover valuable resources but to prolong the useful life of this plant as it is now proposed. With effective waste abatement, this plant could serve the needs of these two counties well into the future.

Thank you very much for your additional consideration.

Very truly yours,

Laurence E. Whittaker
City Administrator

LEW/kc

CC: Rip Riebel



GEORGE LATIMER
MAYOR

CITY OF SAINT PAUL
OFFICE OF THE MAYOR

347 CITY HALL
SAINT PAUL, MINNESOTA 55102
(612) 298-4323

ROUTING

Admin. _____
P. R. _____
H. R. _____
CS/PIO _____

FEB 22 1983

February 17, 1983

For your information _____
Take appropriate action _____
Please reply _____
Prepare reply for Comm sig _____

Mr. Jerry Isaacs, Chairman
Metropolitan Council
Metro Square Building
St. Paul, MN 55101

RE: Ramsey/Washington Waste-to-Energy Project EIS

Dear Mr. Isaacs:

The City of St. Paul's involvement in waste-to-energy project planning dates back to 1975 and before. The Twin Resco project, as it was called at that time, would have provided steam to Hoerner-Waldorf or the NSP High Bridge plant, diverting 1000-1200 tons per day of refuse from area landfills. The economics of this project were not favorable at the time, but the U.S. Environmental Protection Agency awarded the City a grant to continue the planning process. Out of the grant has emerged the current proposal--the Ramsey/Washington County Waste-to-Energy Project.

The positive aspects of the project are that 500-600 tons of waste per day would be transformed from a land disposal liability to a local resource replacing the equivalent of 150,000-200,000 barrels per year of imported energy. We are confident that the negative environmental impacts, particularly air emissions, truck traffic, and steam line routing, will be minimal.

We are hopeful that a cost effective Ramsey/Washington project will become an integral part of a comprehensive solid waste management system in the eastern half of the metropolitan area--including recycling, composting, and other waste-to-energy projects, as these opportunities present themselves.

Sincerely yours,
George Latimer

George Latimer, Mayor
City of St. Paul

GL/djj

cc: Robert J. Orth, Chairman
Ramsey County Board of Commissioners