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**FINAL**

**ENVIRONMENTAL IMPACT STATEMENT**

**Pope-Douglas MSW Ash/Bypass Landfill  
Douglas County, Minnesota**

**September 1992**

**MINNESOTA  
POLLUTION CONTROL  
AGENCY**

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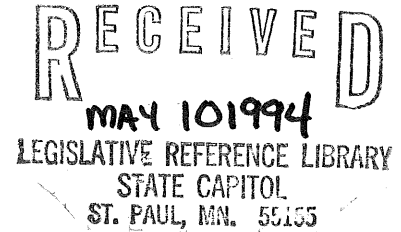
520 Lafayette Road • St. Paul, Minnesota 55155

POPE/DOUGLAS MUNICIPAL SOLID WASTE (MSW) ASH/BYPASS LANDFILL  
ALEXANDRIA, MINNESOTA

FINAL ENVIRONMENTAL IMPACT STATEMENT (EIS)

Minnesota Pollution Control Agency

October 8, 1992



Responsible  
Governmental Unit:

Minnesota Pollution  
Control Agency

Contact:

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Pope/Douglas Solid Waste Management Board

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ABSTRACT: This Pope/Douglas Municipal Solid Waste MSW Ash/Bypass Landfill Final Environmental Impact Statement (EIS) supplements the draft EIS for which Notice of Availability was Published on June 22, 1992. Certain portions of the Draft EIS have been revised; comments on the Draft EIS and responses are presented.

**PUBLIC COMMENT PERIOD:** Written comments on the Final EIS may be made at any time through 4:30 p.m. on October 26, 1992. All written comments should be directed to Kevin J. Kain, EIS Project Manager at the above address.

Together, the Draft EIS and this Final EIS constitute the complete EIS for this proposed project. The MPCA Citizens Board will use both documents together in making the adequacy decision on the EIS, which is expected to occur in November 1992.

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- A: COMMENT LETTERS
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## 1.0 INTRODUCTION AND SUMMARY

The Pope/Douglas Solid Waste Board has proposed to construct a 20-acre municipal solid waste (MSW) ash/bypass Landfill facility on an 80-acre parcel approximately 20 miles west of Alexandria. Under the rules of the Minnesota Environmental Quality Board (EQB), the Minnesota Pollution Control Agency (MPCA) prepared a Draft Environmental Impact Statement (EIS) on the project, which was published for public comment on June 22, 1992. The public comment period ran until August 12, 1992 and included a three week extension. A public meeting to receive comments on the Draft EIS was held in Hoffman on July 21, and was attended by approximately 70 people. By the end of the comment period, the MPCA had received 72 comment letters to go along with thirteen statements presented at the public meeting.

The Final EIS has been prepared in accordance with EQB rules, which require the MPCA, as the responsible governmental unit, to prepare responses to the timely, substantive comments on the Draft EIS consistent with the scoping decision for the project. Chapter 1 includes the purpose and format of the Final EIS, a brief description of the proposed project, a description of the comments received on the Draft EIS, and brief description of Chapters 2 and 3, which are new and contain revised information on the project and responses to public comments.

### 1.1 PURPOSE AND FORMAT OF THE FINAL EIS

The purposes of the Final EIS are to: provide technical information supplementing or revising the Draft EIS; describe the potential impacts, commitments to mitigation, and alternatives related to the project; and respond to comments on the Draft EIS. The Final EIS and Draft EIS together form the basis for the MPCA Board's determination of adequacy.

To determine adequacy, the MPCA Board will decide whether: 1) the EIS followed the approved scope; 2) the Final EIS responded to the timely, substantive public comments received on the Draft EIS; and 3) the MPCA prepared the EIS in accordance with EQB rules.

### 1.2 PROPOSED PROJECT

The Pope/Douglas Solid Waste Board proposes to construct a 20-acre municipal solid waste (MSW) ash/bypass Landfill facility on an 80-acre parcel approximately 20 miles west of

Alexandria. This new landfill would allow Pope County and Douglas County to discontinue their current practice of shipping the ash from their Alexandria waste to energy incinerator to Wisconsin, and the bypass material to a landfill in North Dakota. The proposed project included a 4-cell landfill with each cell having a clay liner, groundwater collection/retention system, leachate collection system, and stormwater retention basin. In addition, the project proposed management of a prairie remnant on the site.

The design details of the proposed landfill outlined in the permit application were based on solid waste rules which existed prior to 1992. In 1992, the State of Minnesota promulgated revised rules for MSW ash landfill design. Chapter 2 of this Final EIS identifies changes which are necessary to comply with the revised ash rules and other suggested mitigative measures to ensure compliance with the Minnesota solid waste rules.

The major mitigative measures of the project include a revised liner design, ground water diversion system, and a leachate collection system. In addition, the project would include management of a prairie remnant<sup>1</sup> on the site.

### 1.3 PUBLIC MEETING AND COMMENTS ON THE DRAFT EIS

The Draft EIS was published for a public comment period that ran from June 22 through August 12, 1992. A public meeting to obtain comments on the Draft EIS was held in Hoffman on July 21, 1992. The meeting was attended by about 70 people and testimony by 13 people was recorded. Seventy-two comment letters also were also received during the public comment period.

In addition to letters from local concerned citizens, the environmental organization, Project Environment Foundation submitted a comment letter, as did the Minnesota Department of Natural Resources (MDNR), the Minnesota Department of Health (MDH) and the United States Fish and Wildlife Service.

The issues raised in the comments were wide-ranging. The major themes related to how the new Minnesota ash rules would effect the project, the adequacy of the proposed ground water diversion system, storm water control, the final height of the landfill, the possible

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<sup>1</sup> Prairie remnants are areas disturbed to varying degrees by humans and livestock over the past 150 years, but with potential to support populations of native prairie plants and animals.

effect of high wind at the site, financial assurance requirements, the selected site and the siting selection process. Comments received at the public meeting and in letters are presented in Chapter 3. The response to comments, also presented in Chapter 3, has been prepared by the MPCA staff with assistance from consultants, the MDNR, and with information provided by the project proposer.

#### 1.4 ENVIRONMENTAL IMPACTS, MITIGATION, AND NEED FOR FACILITY

Chapter 2 of the Final EIS supplements the Draft EIS with technical information describing project modifications, additional mitigative measures, and the need for the project. This information parallels the issues of primary concern in public comments received on the Draft EIS. Key points are highlighted below.

##### 1.4.1 PROPOSED MITIGATION

As originally submitted, the proposed MSW ash landfill does not comply with ash rules passed in 1992. If the SWB continues to pursue the MSW ash landfill, design modifications would be required as discussed below. Other "Mitigation" efforts listed below are efforts which the SWB has indicated they would consider as a means to improve the operation of, or to reduce the pollution potential from the proposed landfill.

###### 1.4.1.1 Design Modifications

###### 1. Liner Design

New Ash rules promulgated in 1992 require the construction of either one or two flexible membrane liners with leachate collection placed over three feet clay, depending upon the concentration of chemicals present in the leachate. The Pope-Douglas Solid Waste Board (SWB) would be required to prepare an entirely new liner design.

The actual liner requirements are based upon the measured leachate concentration. If the leachate concentration of either the fly ash or combined ash exceeds the maximum leachate contaminant level (MLCL) two flexible membrane liners would be required. During testing of the fly ash from the waste-to-energy facility, the MLCL for at least one chemical was exceeded in the fly ash. Therefore, two flexible membrane liners with three feet of clay would be required.

2. Separate Ash/MSW Bypass Cells

A revised design would require separate MSW incinerator ash and bypass cells.

3. Surface Water Retention

The surface water retention pond would have to be designed to receive runoff from the entire site. This includes the borrow area and cover stockpile area in addition to the landfill area.

4. Groundwater Retention

A separate groundwater holding tank to receive the groundwater which is removed from beneath landfill would be required.

5. Fence

The SWB would be required to install a chain link fence surrounding the leachate loadout and holding tanks.

6. Leachate Storage Tank

Use non-corrosive materials such as fiberglass in lieu of steel for the leachate storage tank would be considered.

7. Smaller Cells

A plan to reduce the size of the cells at the landfill to permit faster closure of the cells would be considered.

8. Composite Liner for MSW

The feasibility of constructing a composite liner beneath the MSW as well as the ash cell would be considered.

9. Weigh Scale

The SWB would consider installing a weigh scale at the landfill.

10. Site Driveways

The SWB would consider providing an additional site access from the north to enhance the leachate removal operations.

11. Gas Vents

Gas flares to burn the landfill gas would be required to install if significant volume of unprocessed MSW is proposed to be placed in the landfill.

12. Landfill Capacity

The SWB will attempt to increase the recycling efficiency to exceed the state requirement of 30%. They will investigate transporting excess unprocessed MSW to another facility so that no unprocessed MSW would be placed in the landfill.

1.4.1.2 Operation Practice Modifications

1. Leachate Disposal

The SWB would be required to execute a leachate treatment agreement with a wastewater treatment facility in the event that the leachate may not be utilized for quench water.

2. Daily Cover

The SWB would provide daily cover of ash.

3. Waste Placement

The SWB would compact the ash in the landfill to achieve maximum density.

4. Erosion Protection

The SWB would provide and maintain a silt fence placed around the stockpile to trap sediments and prevent deposition in the wetlands.

5. Windy Conditions

The SWB would place wind screens and would discontinue filling operations during periods of windy conditions.

1.5 LANDFILL SITING

1.5.1 MPCA INVOLVEMENT IN THE LANDFILL SELECTION PROCESS

Landfill siting is a difficult public policy issue that has received much attention during the environmental review of this proposed facility. It is understandable that the proposed solid waste management facility would attract concern and opposition from people living in the vicinity of the proposed site. Through the Minnesota Waste Management Act and the continued involvement of the Legislative Commission on Waste Management, this difficult public policy question has been addressed, and the following direction has been provided to state and county governments with respect to their roles in solid waste facility siting.

The MPCA is responsible for establishing the criteria for design and operation of landfills through a combination of rules and environmental permits. The state solid waste rules specify the basic design and locational criteria (i.e. setbacks from lakes, streams, etc.). The solid waste facility permit specifies the exact design and operational criteria that must be applied to the proposed facility to protect the surrounding environment. The permit is an enforceable contract containing specific design and operational requirements that must be complied with.

The MPCA's "siting" role is to first establish the general siting criteria in statewide solid waste rules, which was done in 1988, and second, once a site is selected, to review whether the proposed site complies with those criteria. The site search and selection is performed by the County. When selecting a site, the local unit of government must assure that the site meets all the federal, state, and local laws and rules pertaining to the type of facility that is being sited.

## 2.0 PROJECT MODIFICATIONS, ENVIRONMENTAL IMPACTS AND MITIGATION

This section supplements the Draft EIS prepared for the Pope-Douglas MSW Ash/Bypass landfill proposal. It contains revised information on the project description, and on the potential environmental impacts and mitigation measures.

### 2.1 PROJECT DESCRIPTION

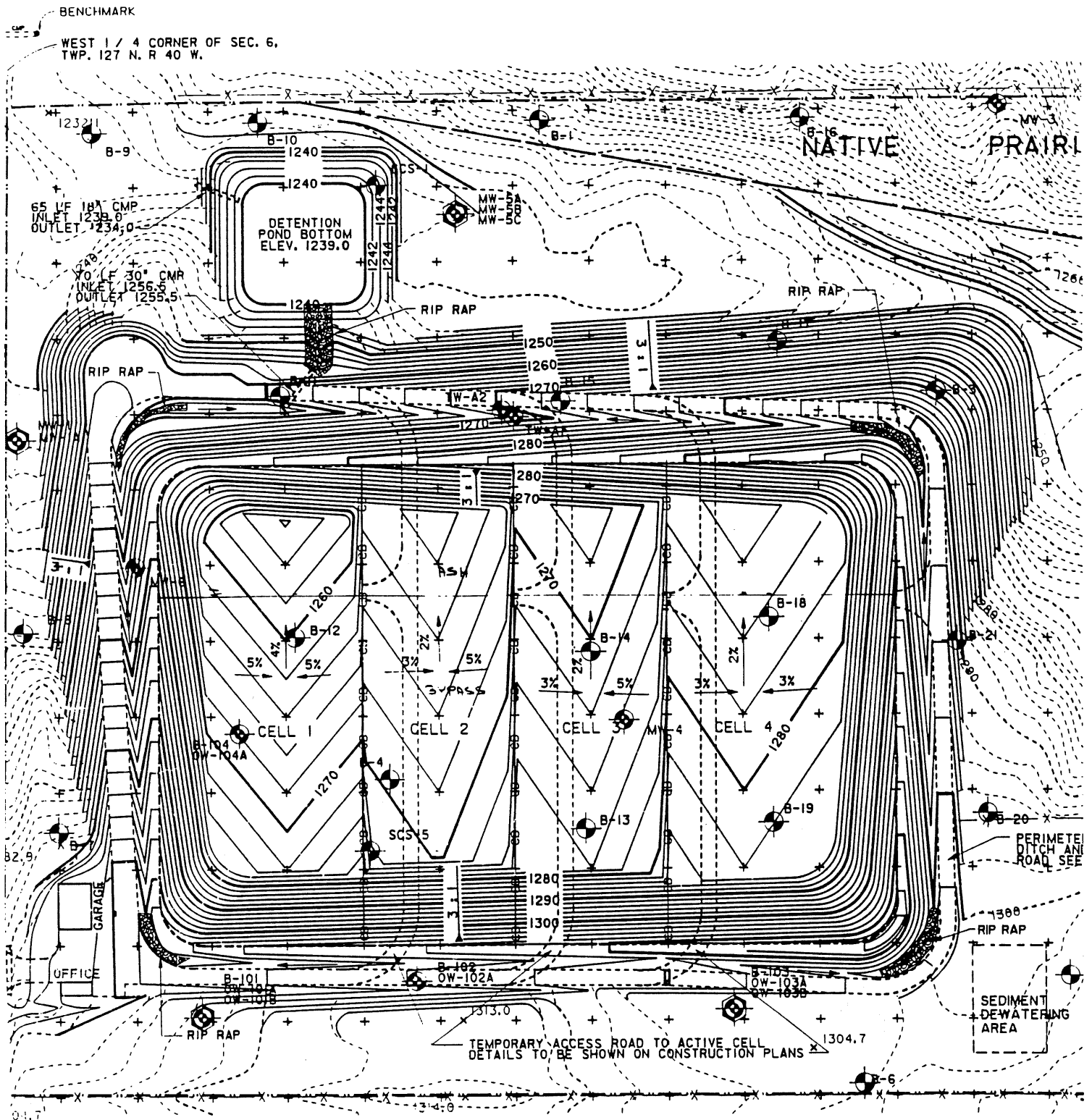
The scoping document requires a map of the proposed final contours. Figure 4-2 of the DEIS is a map of the proposed final contours.

Figures 1 through 4 of this section expands upon the requirement to show the appearance of the landfill. Figure 1 shows the proposed base grade plan, Figure 2 shows the proposed final grade contour plan, and Figures 3 and 4 show cross sections in the north-south and east-west direction. Appendix C contains figures representing artists renderings of the anticipated appearance of the landfill after closure.

As identified in the DEIS, Minnesota Solid Waste rules governing ash landfills were revised in 1992. The liner requirements of the "old" rules will no longer apply. A new design will be required to comply with the provisions of 7035.2885. Subpart 11 states that if Fly Ash and Bottom Ash are combined, leach results must be taken from fly ash only. Leach test results on the Pope-Douglas fly ash identified some elemental concentrations in excess of the maximum leachate contaminant levels (MLCL) of part 7045.0131 (EP). Thus, the required liner may be a double liner which includes the following from top to bottom:

- a) a drainage layer;
- b) a synthetic membrane which is at least 60/1000 of an inch thick;
- c) a secondary drainage layer;
- d) a synthetic membrane which is at least 30/1000 of an inch thick; and
- e) A recompacted compacted clay layer which is at least three feet thick with a permeability no greater than  $1 \times 10^{-7}$  centimeters per second.

Figure 5 is a cross section diagram of the anticipated liner.



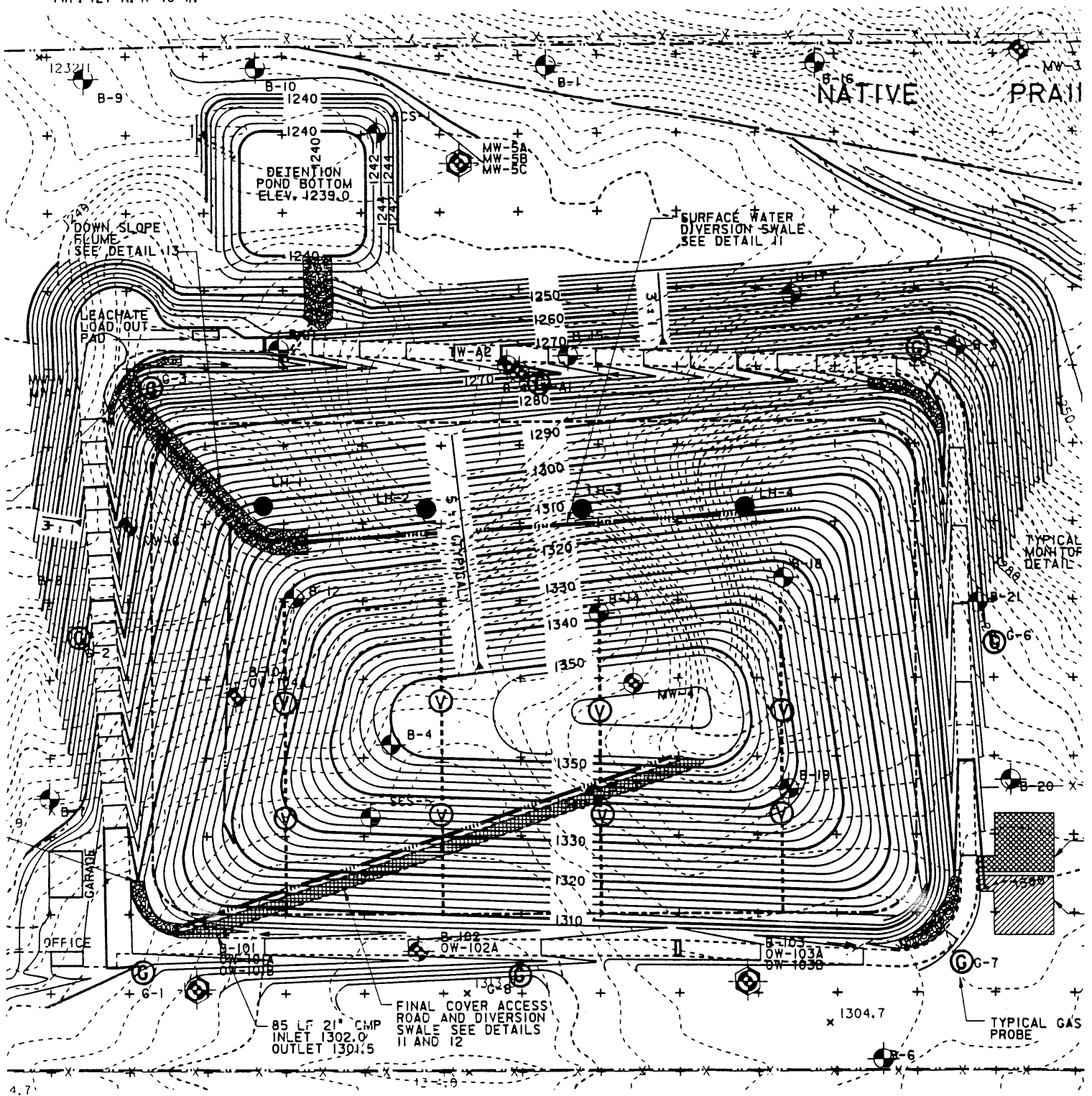
1+00E    2+00E    3+00E    4+00E    5+00E    6+00E    7+00E    8+00E    9+00E    10+00E    11+00E    12+00E    13+00E    14+00E

## Proposed Pope Douglas MSW Ash/Bypass Landfill

### Figure 1 BASE GRADE PLAN

BENCHMARK

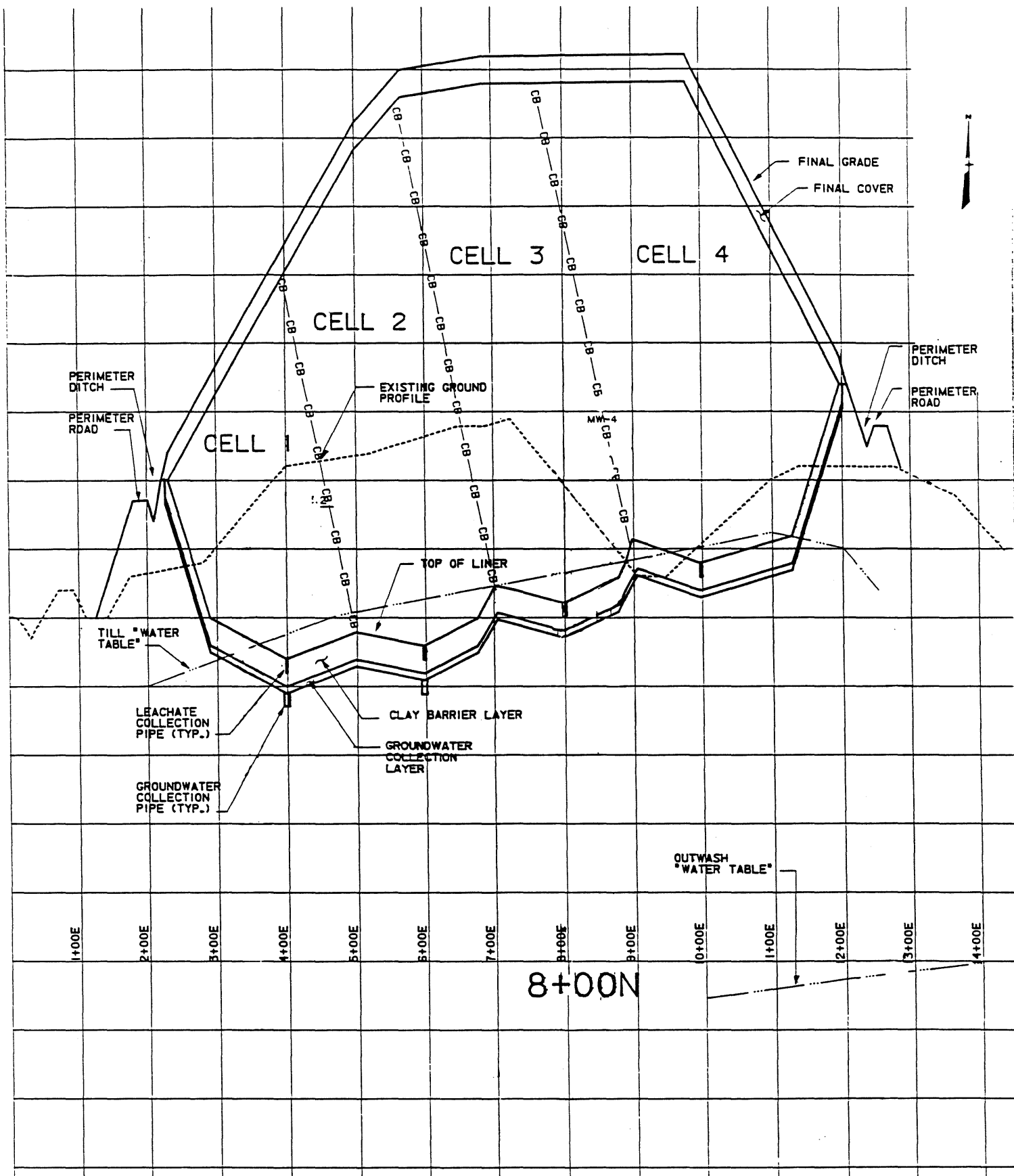
WEST 1/4 CORNER OF SEC. 6,  
TWP. 127 N. R. 40 W.



1+00E    2+00E    3+00E    4+00E    5+00E    6+00E    7+00E    8+00E    9+00E    10+00E    11+00E    12+00E    13+00E    14+00E

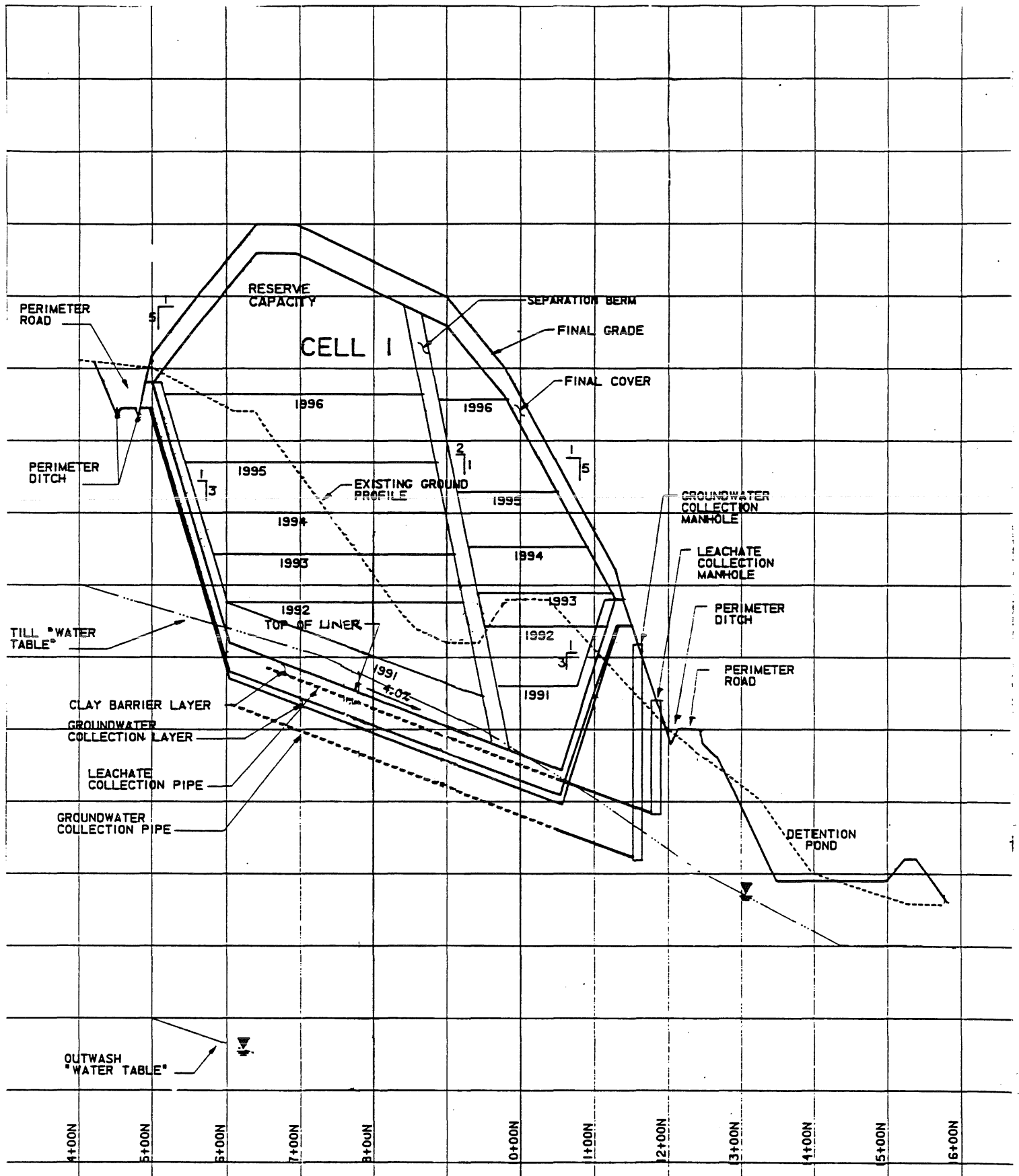
### Proposed Pope Douglas MSW Ash/Bypass Landfill

## Figure 2 FINAL GRADING PLAN



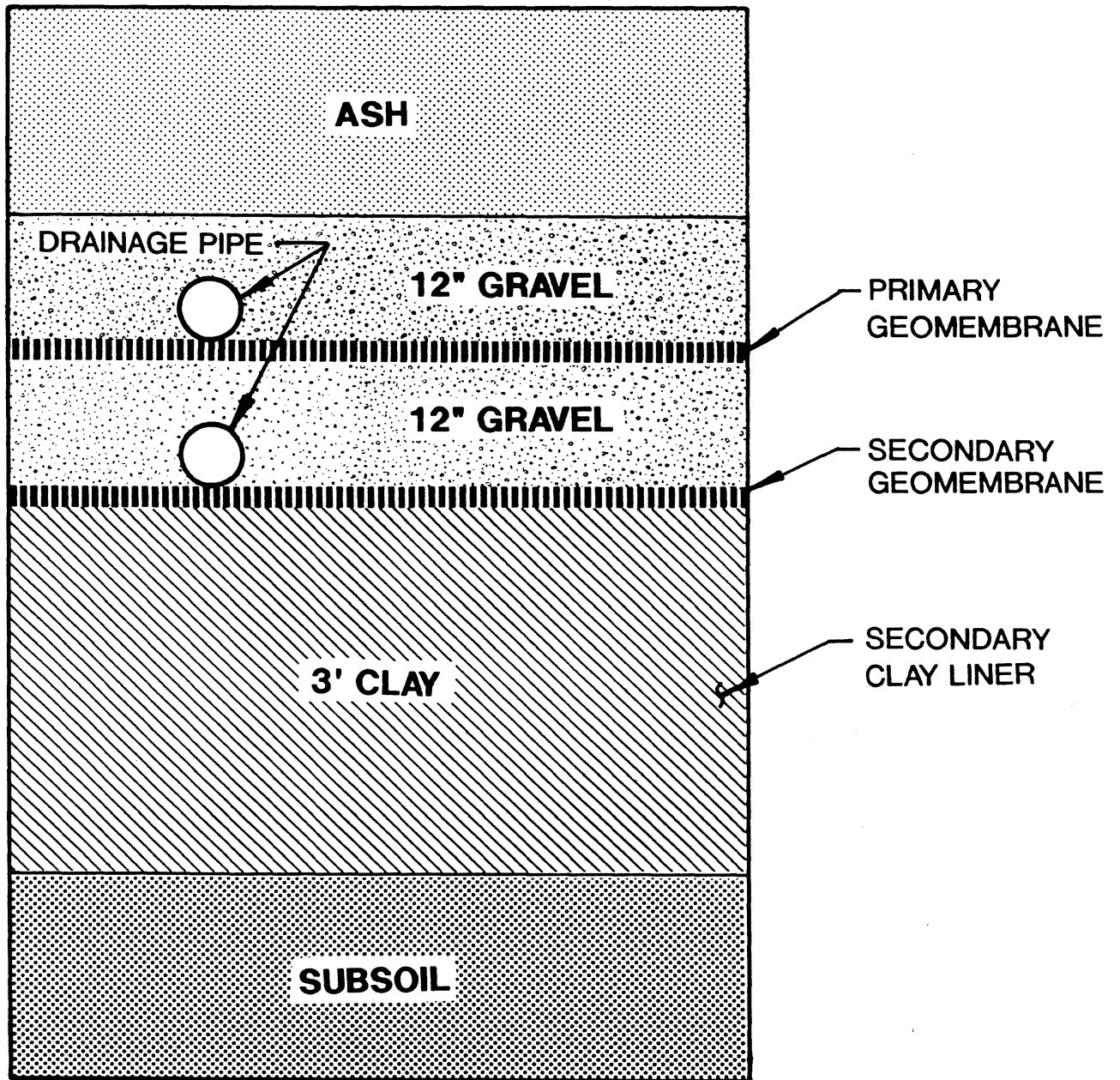
**Proposed Pope Douglas MSW Ash/Bypass Landfill**

**Figure 3 LANDFILL SECTION**



**Proposed Pope Douglas MSW Ash/Bypass Landfill**

**Figure 4 LANDFILL SECTION**



**Proposed Pope Douglas MSW Ash/Bypass Landfill**

**Figure 5 ANTICIPATED LINER DESIGN**

### 3.0 COMMENTS ON THE DRAFT EIS AND RESPONSES

A major purpose of the Final EIS is to present a forum for addressing public concerns and questions. Comments on the Draft EIS were solicited by the MPCA and received through letters and a public meeting in Hoffman. The comment period ended on August 12, 1992. All verbal and written comments have been summarized and are presented in Section 3.2 followed by the appropriate response.

### 3.1 SUMMARY OF PUBLIC MEETING

The public meeting in Hoffman was held on July 21, 1992, and was attended by approximately 70 people. An Informational presentation was made by Mr. Dennis P. Nagle, Director of the Pope/Douglas Solid Waste Management. Verbal comments were received from 13 individuals. The meeting was recorded by a court reporter (**Appendix B**). Verbal comments requiring responses have been summarized and are presented in section 3.2 followed by appropriate response. The list of those who gave testimony at the public meeting and where their comments have been responded to are listed below.

#### PERSONS GIVING TESTIMONY AT THE PUBLIC COMMENT MEETING:

A. Gordon Larson

See Section A7,20,31,45,46,49,53,63,69,71, C14, D5

G13,15,22, H2,3, I1

B. Roger Anderson

See Section A7,10,14,28,48,68, B2, C2, F4, G2,8,12,14,18, I2

C. Dennis Satre

See Section A10,27,29,43,67, D6

D. Christine Spaulding

See Section A23,50, B2, C2

E. Ken Johnson

See Section G12,17, H4, I1

F. Joel Levie

See Section A26,62, G9,10,17,23

G. Bob Johnson

See Section G14

H. Steve Ellis

See Section A31, D5

I. Stan Stark

See Section D5, G14, I4

J. Allen Anderson

See Section C2,7, G12

K. Joyce Johnson

See Section D1, G12

L. Dennis Winter

See Section A51,54,55,56, D5, I3

M. Gerald Johnson

See Section G3

### 3.2 COMMENT LETTERS REGARDING THE DRAFT EIS

A total of 72 comment letters were received from various government agencies, citizen's group, and individuals. Letters are numbered 1 through 72. Copies of the comment letters are contained in **Appendix A**. The list of those who sent in comment letters and where their comments have been responded to are presented in Section 3.2.

1. Sue Bolander, Assistant Wetland Manager, United States Fish and Wildlife Service, Route 1, Box 76, Fergus Falls, MN 56537, letter dated July 7, 1992.

See Section C1

2. Thomas W. Balcom, Supervisor, Office of Planning, Minnesota Department of Natural Resources, 500 Lafayette Road, St. Paul, MN 55155, letter dated July 16, 1992.

See Section E1,2

3. Dennis P. Nagle, Director, Pope/Douglas Solid Waste Management, 305 8th Avenue West, Alexandria, MN 56308, letter dated July 16, 1992.

See Section A1,2,3,4, G16

4. Marjorie Geris, P.O. Box 553, Alexandria, MN 56308, letter dated July 16, 1992.

See Section A6

5. Harvey D. Tewes, 3808 Crestwood Drive, Alexandria, MN 56308, letter received July 17, 1992.

See Section H6

6. Matthew Pederson, P.O. Box 201, Starbuck, MN 56381--0201, letter received July 17, 1992.

See Section H6

7. Mrs. Mannie Hegberg, P.O. Box 195, Kensington, MN 56343, letter dated July 18, 1992.

See Section H5

8. Josephine Steffanson-Boness, Box 283, Hoffman, MN 56339, letter dated July 20, 1992.

See Section A5, C2, E3, G1, H5

9. Duane L. Olson, 1611 East Lincoln Avenue, Lot 47, Alexandria, MN 56308, letter dated July 21, 1992.

See Section H6

10. Rodney F. Eldevik, 1211 Maple Drive, Alexandria, MN 56308, letter dated July 21, 1992.

See Section H6

11. Virgil Amundson, Box 144, Starbuck, MN 56381, letter dated July 22, 1992.  
See Section H6
12. Warren Olson, Box 46, Starbuck, MN 56381, letter dated July 23, 1992.  
See Section H6
13. Kevin Weber, Route 1, Box 164W, Alexandria, MN 56308, letter dated July 23, 1992.  
See Section H6
14. Kathryn LeBrasseur, 521 West Lincoln, Alexandria, MN 56308, letter dated July 24, 1992.  
See Section H6
15. Harvey D. Tewes, Douglas County Auditor, 305 8th Avenue West, Alexandria, MN 56308-1793, letter dated July 24, 1992.  
See Section H6
16. Ernest L. Olson, P.E. Douglas County Engineer/Public Works Director, P.O. Box 398, Alexandria, MN 56308, letter dated July 24, 1992.  
See Section H6
17. Stanley Smith, Box 61, Hoffman, MN 56339, letter dated July 27, 1992.  
See Section H1,2
18. Lowell Peterson, Crestview Manor, Route, 1 Box 51, Evensville, MN 56326, letter dated July 27, 1992.  
See Section H6
19. Jean Sleth, Crestview Manor, Route, 1 Box 51, Evensville, MN 56326, letter dated July 27, 1992.  
See Section H6
20. Richard Hardine, Crestview Manor, Route, 1 Box 51, Evensville, MN 56326, letter dated July 27, 1992.  
See Section H6

21. Sheldon Anderson, Crestview Manor, Route, 1 Box 51, Evensville, MN 56326, letter dated July 27, 1992.

See Section H6

22. Renee Schecker, Crestview Manor, Route, 1 Box 51, Evensville, MN 56326, letter dated July 27, 1992.

See Section H6

23. Susanne Anderson, Crestview Manor, Route, 1 Box 51, Evensville, MN 56326, letter dated July 27, 1992.

See Section H6

24. Melba Shurburn, Garfield, MN 56332, letter dated July 20, 1992.

See Section H6

25. Bonita Gilbertson, 1307 Woodcrest Road, Alexandria, MN 56308, letter dated July 23, 1992.

See Section H6

26. Jerry Rathke, Project Manager - Water Plan, Douglas County, Department of Public Works, P.O. Box 398, Alexandria, MN 56308, letter dated July 28, 1992.

See Section H6

27. R'Lou M. Olson, 1816 Fillmore, Alexandria, MN 56308, letter dated July 29, 1992.

See Section H6

28. James and Ann Smidt, 1409 Ridgeview Terrace, Alexandria, MN 56308, letter received July 31, 1992.

See Section H6

29. Marilee G. Trosen, 1419 Irving Street, Alexandria, MN 56308, letter dated July 27, 1992.

See Section H6

30. Karen Hardine, Rt. 1 Box 375, Alexandria, MN 56308, letter dated July 27, 1992.

See Section H6

31. Karen Ness, P.O. Box 432, Hoffman, MN 56339, phone call July 30, 1992.

See Section A63, H6

32. William J. Anderson, 616 - 10th Avenue East, P.O. Box #6, Alexandria, MN 56308, letter dated July 24, 1992.

See Section H6

33. Kristi Muzik, 612 1/2 - 6th Avenue East, Alexandria, MN 56308, letter dated July 22, 1992.

See Section H6

34. Raymer M. Stock, R.R. 1 Box 82, Kensington, MN 56343, letter dated July 30, 1992.

See Section A7,8,12,65, B1

35. David Nelson, R.R. 5, West Lake Carlos, Alexandria, MN 56308, letter dated July 23, 1992.

See Section H6

36. Verle R. Hammer, President, Farmer State Bank of Hoffman, Hoffman, MN 56339, letter dated July 30.

See Section G2,3, H5

37. Allen Crowser, Systems Engineer, Alexandria Light and Power, 316 Fillmore Street, P.O. Box 609, Alexandria, MN 56308, letter dated July 30, 1992.

See Section H6

38. Ebba and LeMay W. Olson, 406 Dakota Avenue, Hoffman, MN 56339, letter dated July 31, 1992.

See Section C2, H5

39. Jim Rooney, 23260 Wenersberg Road, Kensington, MN 56343, phone call on August 4, 1992.

See Section B2, D1, G2, H5

40. W. Berdell Skogstad, P.O. Box 164, Hoffman, MN 56339, letter dated August 1, 1992.

See Section A9, B2, C2, H2, H5

41. Donna Petersen, Route 7, Box 654, Alexandria, MN 56308, letter dated July 22, 1992.

See Section H6

42. R.W. Arthur, 8802 NE Lobster Drive, Alexandria, MN 56308, letter dated August 1, 1992.

See Section H6

43. Kathleen Norlien, MS, Carol Wiessner, Kathlerine McGill, Project Environment Foundation, 26 East Exchange Street, Suite 206, St. Paul, MN 55101-2264, letter dated August 5, 1992.

See Section A10,11,12,13,14,19,20,21,66, C3,6,8,9, D2, F1,2,3,4, H3

44. Mae and Harry Youngberg, P.O. Box 233, Hoffman, MN 55339, letter received August 6, 1992.

See Section B3, D1, G4,12, H5

45. Billie White, P.O. Box 117, Hoffman, MN 55339, letter received August 6, 1992.

See Section H5

46. Ruth Goodwin-Nagle, RR 1 Box 44A, Garfield, MN 56332, letter dated August 5, 1992.

See Section H6

47. Dennis Satre, Mayor, City of Hoffman, Dennis Winter, Elk Lake Township Supervisor, Gordon Larson, Ken Anderson, Jerry Johnson, comments summarized by L. Michael Johnson, P.E., PEER Environmental and Engineering Resources, Inc., 11 Peavey Road, Chaska, MN 55318, letter dated August 10, 1992.

See Section

A10,14,16,17,18,22,23,24,25,26,28,29,30,56,57,58,59,65,67,68,69, B4,5,6,7,8,  
C2,4,10,11, G5,12,17,18,19, H5

48. Tim Hutchings, Box 181, Hoffman, MN 56539, letter dated August 3, 1992.

See Section A23,31,34,35,36,37,38,60, C5,6,12, D6, F5,6,  
G1,2,3,4,13,21, H5

49. Walter and Greta Roske, Box 42, Hoffman, MN 56339, letter dated August 6,  
1992.

See Section B4, H5

50. Richard Howe, PLS and James Van Alstine, PhD, Rt 1 Box 569, Garfield Mn  
56332, letter dated August 6, 1992.

See Section H6

51. Resolutions received from: Donovan Schaub, Mayor, City of Glenwood, Delphin  
Engel, Supervisor, Moe Township, Donald Welton, Chairman, Alexandria Township,  
Julian M. Loken, Supervisor, La Grand Township, Karl Glade, Mayor, City of  
Alexandria, letter dated August 7, 1992.

See Section H6

52. Pam Hoidahl, Rt. 1, Box 65, Garfield, MN 56332, letter dated August 7,  
1992.

See Section H6

53. Allen Johnson, Lake May Township Supervisor, Rt. 2 Box 103, Alexandria, MN  
56308, letter dated August 8, 1992.

See Section H6

54. William F. Anderson, P.O. Box 391, Hoffman, MN 56339, letter dated August  
8, 1992.

See Section B9, H5

55. Skipped

56. B.A. Bales, Carlos Township Supervisor, 8170 East Lake Carlos Drive Northeast, Carlos, MN 56319, letter dated August 7, 1992.

See Section H6

57. Judith A. Ball, Environmental Review Coordinator, Minnesota Department of Health, Division of Environmental Health, 925 Delaware Street Southeast, P.O. Box 59040, Minneapolis, MN 55459-0040, letter dated August 12, 1992.

See Section A15, 40, B10,11,12,13, D4, F7

58. Calvin R. Sperling, 8416 Queen Annes Drive, Silver Spring, MD 20910, letter dated August 11, 1992.

See Section A14,16,41, C13, E4,5,6, G12,20, H5

59. Harry Vestrum, Box 123, Hoffman, MN 56339, letter dated August 8, 1992.

See Section B2, C2, H5

60. Bob and Joy Johnson, Red Rock Ranch, Route 1 Box 101-A, Hoffman, MN 56339, letter received August 14, 1992.

See Section B1,9, C2, F8, G1,6,7, H5

61. Roger Anderson, Box 438, Hoffman, MN 56339, letter received August 14, 1992.

See Section A10,14,67,68, B1,2, C2, D5, H5

62. Solem Township, Douglas County, Lucille Johnson, Terry Randt, Kenneth Anderson, Norman Goodwin.

See Section A5,6,9,60,61, B1, C9, D5, G1,12, H5

63. Honorable Hilda Bettermann, Minnesota House of Representatives, District 11B, Route 1 Box 57, Brandon, MN 56315, letter dated August 6, 1992.

See Section A33, H6

64. Allen Zeithamer, Route 3 LaGrand Township, Alexandria, MN 56308, letter dated August 11, 1992.

See Section A10,14,32,69, H5

65. Harvey V. Beuckens, Editor, The Hoffman Tribune, Hoffman, MN 56339, letter received August 14, 1992.

See Section B2, D5, G12, H5

66. Gerald and Julie Briese, 7271 Sandy Hill Road Southwest, Hoffman, MN 56339, letter August 10, 1992.

See Section A42, B2, G19,21, H5

67. Sara Salisbury, 202 Iowa Avenue, Box 41, Hoffman, MN 56339, letter received August 13, 1992.

See Section H5

68. Dennis Satre, Mayor, The City of Hoffman, P.O. Box 227, Hoffman, MN 56339, letter dated July 8, 1992.

See Section A43,44,56, C2, E2, G17, H5

69. Wally Anderson, County Commissioner 3rd District, Grant County, Herman MN 56248, letter dated August 8, 1992.

See Section A57,64, F4,9,10,11,12,13, H5

70. Gordon Larson and Louise Larson, Route 1 Box 4, Hoffman, MN 56339, letter received August 13, 1992.

See Section A7,10,44,45,57,65,70,71, C2, G5, H5

71. Richard A. Anderson, Route 2 Box 8, Evansville, MN 56326, letter dated August 7, 1992.

See Section H6

72. Donald C. Olson, Olsons Hardware Hank, Box 276, Hoffman, MN 56339, letter received August 14, 1992.

See Section A18,28,47,48, G13, H5

**LETTERS RECEIVED AFTER THE END OF THE COMMENT PERIOD.**

Josephine Staffanson-Boness, P.O. Box 283, Hoffman, MN 56339, letter dated August 20, 1992.

Vernal and Marlene Nelson, Oakdale Farm, Kensington, MN 56434, letter dated August 18, 1992.

The summary of comments that was compiled by the Minnesota Pollution Control Agency is listed in Sections A through I below.

**A. FACILITY DESIGN AND OPERATIONS**

1. COMMENT: The Household Hazardous Waste collection program is expected to begin operation in the Pope/Douglas area in October 1992. The program includes a new Household Hazardous Waste building located on the site of the Waste To Energy Facility in Alexandria for dropoff of waste by the homeowners. (3)

RESPONSE: This comment is noted.

2. COMMENT: The Pope/Douglas incinerator does not operate at 980-degrees Centigrade as stated in the Draft Environmental Impact Statement (DEIS). The minimum allowed by their air quality permit is 1,800 degrees F (982°C). In order to make sure we are in compliance, the minimum operating temperature of our furnace is 1,010-degree centigrade. The maximum temperature that is allowed is 1,232.2-degree centigrade. (3)

RESPONSE: This comment is noted.

3. COMMENT: The combustion efficiency at the incinerator is excellent as evidenced by the very low concentrations of carbon monoxide that are emitted. Testing shows that the carbon monoxide concentrations are at 5 to 10 parts per million (3)

RESPONSE: The comment is noted.

4. COMMENT: The draft EIS states that the residence time of waste in the incinerator is one second. This is false as the residence time in the furnaces is greater then 2 seconds. The acceptance testing has shown that the gas residence time of 2.215 seconds. (3)

RESPONSE: The comment is noted.

5. COMMENT: Letters express concern that if something goes wrong it will not be able to be undone. (8, 62)

RESPONSE: The concerns are noted. The safeguards required by the Minnesota solid waste rules include waste liner systems, leachate collection systems, groundwater monitoring systems, surface water control systems, landfill gas monitoring and collection, and an establishment of a fund to clean up of contamination if some should occur. While the development of a landfill cannot be risk free, recently formed ash disposal regulations attempt to address all the conceivable environmental concerns. The Pope-Douglas Ash/MSW Bypass landfill would have to be constructed according to the most stringent liner requirements.

6. COMMENT: It is intended that the existing "Sandy Hill" Solem Township Road, which serves the area of the proposed landfill site, would be designated as a county road if this site receives formal approval. County road designation would be, as a minimum, from Trunk Highway 27 to the actual landfill site entrance. Improvements would be safety, dust control, and structural strength for a 9 or 10 tons per axle all-weather landfill site access. (16, 62)

RESPONSE: The comment is noted.

7. COMMENT: Why was the original 39 acres scaled down to 20 acres? (34, 70, T13/11, T19/4)

RESPONSE: Twenty acres is the area covered by the landfill and landfill berms. Thirty-nine acres covers the landfill plus the clay borrow area and surface water control ponds. The entire site contains 80 acres.

8. COMMENT: How can you close a cell and leave others open 40 feet high? (34)

RESPONSE: The manner in which the landfill cells would be operated is as follows: The waste would be filled to final contours as quickly as possible and

the SWB would begin closure activities on those portions of the landfill which will not be in contact with other waste (i.e., the outside slopes of the landfill). The portion of the landfill which would be adjacent to the adjacent operating cell would not be closed at that time. When an individual cell has been brought to final grade, waste would continue to be placed against the previous cell. Partial closure of the outside faces of the landfill would occur on an ongoing basis as the waste reaches final grade.

9. COMMENT: The trucks hauling to and from the facility will be harmful to the highways and repair and maintenance of the highways is already extremely high. (40, 62,)

RESPONSE: Trunk highway 27 is designed as a 10 ton road, which is adequate to handle traffic from the solid waste transfer vehicles, which are anticipated to average 7 vehicles per day over a 30-year design life. The Pope-Douglas Solid Waste Board indicated in Letter No. 16 that the County would take over ownership of the Sandy Hill township road and would upgrade it to a paved 9 or 10 ton road.

10. COMMENT: As written, the DEIS fails to provide the public with information as to what the actual ash landfill will look like once it has been designed to comply with the 1992 Minnesota MSW ash disposal rules. (43, 47, 61, 64, 70, T13/17, T16/18)

RESPONSE: To give an idea of what the liner and leachate collection systems would look like, please see the diagrams in Appendix C of this Final EIS. The scoping document and the EIS were prepared on the original project design and permit application that was formally submitted to the MPCA for the proposed ash/bypass landfill. The environmental review process is a dynamic process that frequently results in changes to a project due to public input, new information, and in this case, a rule change. If, and when a draft permit is prepared for this project, the final design of the landfill will be presented to the public for review and comment. The draft permit would include the final design which will include many of the mitigative measures that were identified during the environmental review process.

11. COMMENT: The DEIS should state what type of liner system would be required for this particular ash landfill. (43)

RESPONSE: Please refer to the response to comment No. 10. (pg 3-13)

12. COMMENT: An evaluation must be completed for the soils proposed for the cover and liner construction. (34, 43)

RESPONSE: An engineering evaluation of the cover and liner material would be required prior to construction of either the liner or the cover.

13. COMMENT: As currently written, the ash rules require efficiency ratings of the liner system in combination with the cover system for an overall site efficiency of 99% for collection or rejection of the precipitation that falls on the disposal area. In order to determine the specific percent efficiency required, it is necessary to have full knowledge of the toxicity levels within the specific ash stream which will affect the final design of the proposed ash landfill. This information must be included within the final EIS. (43)

RESPONSE: Section 4.1.3 of the DEIS discusses the ash composition and the leachate concentration of the proposed leachate. Section 2 of the FEIS in this document identifies liner requirements under the new ash rules.

14. COMMENT: What is the design life of the ground water diversion system? Has this type of control system been utilized before? If so where, and have there been any problems associated with this type of control, including failures of the system? (43, 47, 58, 60, 61, 64, T14/9,11)

RESPONSE: The groundwater diversion system must operate at least during the operating life and the post closure period of the landfill. Following the post closure period, additional maintenance and/or monitoring may be required at the discretion of the MPCA.

This type of system is currently in use and functioning satisfactorily at an industrial landfill in Wisconsin, as well as in Olmsted County.

Similar systems are being proposed for MSW landfills in Renville County and Marshall/Kittson Counties.

The type of problems which could exist would be plugging of the system if silt or other material were allowed to gain access to it, or if biological growth would occur within the pipe. The Pope-Douglas Solid Waste Board has proposed to provide a clean-out system for this. Mitigative efforts to reduce potential problems would include a monitoring and cleaning requirement in any permit which would be issued.

15. COMMENT: In order to facilitate maintenance of the ground water collection system, it is recommended that extra manholes be installed to make it possible to clear accumulated debris. (57)

RESPONSE: The recommendation that additional manholes be installed to enhance removal of silt and other debris would be considered as a mitigation effort to offset a negative impact, if the Minnesota Pollution Control Agency should determine that the site may proceed to the repermitting phase.

16. COMMENT: The examination of similar type ground water diversion systems were specified in the scoping document. (47, 58)

RESPONSE: Please refer to Comment 14. (pg 3-14)

17. COMMENT: What criteria will be utilized to determine when the ground water dewatering can be discontinued or when the system fails? (47)

RESPONSE: The groundwater dewatering system is designed as a gravity draining dewatering system. The dewatering system is anticipated to continue to operate effectively as long as this system is monitored and maintained in accordance with an appropriate maintenance schedule. The monitoring and maintenance schedule are anticipated to be required during the life of the landfill and during the post closure monitoring period. Following the post closure period, additional

maintenance to the groundwater dewatering system and/or monitoring may be required at the discretion of the MPCA.

The permit application proposed that the water quality of the dewatering would be addressed by sampling of a manhole located near the drainage system outlet to detention pond. This manhole sampling was proposed to be part of the environmental monitoring system for the facility. The sampling protocol, parameters and frequency would be the same as that which is utilized on the remainder of the groundwater monitoring system at the site. The DEIS identified that a mitigation effort to offset potential problems caused by discharging the groundwater to the surface water basin would be to construct a separated groundwater holding tank, which can be considered as a permit condition by the MPCA.

18. COMMENT: If the ground water dewatering system is stopped and the system fails how long will it take before the waste in the cells become saturated? (47, 72)

RESPONSE: In the event that the groundwater system becomes plugged such that groundwater can no longer be collected within the system, the groundwater will attempt to equilibrate to the approximate pre-development groundwater level. The pre-development groundwater level occurs below the proposed liner grade in some areas of the landfill cells and is up to ten feet above the top of liner grade in other areas of the landfill cells. Since two (2) synthetic membrane liners with leachate collection systems would be required, a barrier against the movement of groundwater into the landfill would be formed. If water did penetrate the synthetic liner, it would likely be removed by the leachate collection system.

19. COMMENT: A weigh scale should be utilized an the landfill. (43)

RESPONSE: This comment is noted as a mitigative effort to improve the operation of the landfill. The Minnesota Pollution Control Agency can consider this comment in the event that the landfill should proceed to the permitting phase.

20. COMMENT: Project Environment Foundation (PEF) supports placement of a composite liner beneath the MSW cells to increase leachate collection efficiency and reduce potential ground water contamination. (43, T48/5,17)

RESPONSE: The comment is noted as a mitigative effort to offset a potentially negative impact. The Minnesota Pollution Control Agency can consider this if the landfill should proceed to the permitting phase.

21. COMMENT: PEF supports the composting of lawn clippings, the submittal of a dewatering plan, construction of a security fence around the leachate storage/loadout facility, landfill screening to enhance the aesthetics of the final site and upgrading and paving Sandy Hill Township Road. (43)

RESPONSE: The PEF support for these identified mitigative actions recommended in the DEIS is noted. Yard waste would not be allowed in the proposed landfill. Two permitted yard waste composting sites currently exist in the counties and the S.W. Board has expressed their intention to continue their on-going program of soliciting land disposal sites for disposal of yard waste compost.

The Douglas County Department of Highways has indicated that the County would take over responsibility for Sandy Hill Township Road and would upgrade it to a 9 or 10 ton road.

22. COMMENT: Will the County have to reissue the necessary conditional use permit for this site? (47)

RESPONSE: It is the legal opinion of Ann L. Carrott, Douglas County Attorney, that conditional use permit #49-85 which was issued for this project in 1985 will not have to be reissued.

23. COMMENT: Will white goods and tires be collected, stored, or disposed of at the landfill, and will there be vector control? (47, 48, T17/22)

RESPONSE: The Pope/Douglas Waste Management Board has indicated they do not plan to accept tires or white goods at this site. During the time which has expired since the initial permit application, two private firms have begun accepting these items. If the need arises in the future. The SW Board would be moving the items to a recycling center for proper handling.

The most effective method of vector control at the landfill is the application of cover to the waste. MPCA cover requirements are designed to prevent vector problems.

24. COMMENT: Why is the less protective Design Requirement 1 (table 4.4) being applied instead of the more protective design Requirement 2 when it appears that the leachate lead concentration will exceed the MLCL of 0.3 mg/l ? (47)

RESPONSE: The 1992 ash rules will require the more stringent liner design if the leachate concentration exceeds the MLCL. Note the discussion of this item in Section 2 of the FEIS.

25. COMMENT: Are there any anticipated changes to the proposed project if it becomes permitted and could the county build anything that was not up to the rule requirements or permit conditions? Can the citizens have an impact on the permit? (47, T59/12,16)

RESPONSE: The proposed facility as identified in the original permit application, was based on solid waste rules which were current prior to 1992. In the event that SWB should continue to pursue this facility, they would be required to comply with the current solid waste rules, which, among other items, will require a revised liner design. The public is invited to provide input to the MPCA during preparation of a permit.

26. COMMENT: Does the Pope/Douglas Solid Waste Board have any plans to accept waste from other counties or from other landfills such as the ash that is currently stored at the Kluver landfill? (47, T24/7, T27/22)

RESPONSE: The SW Board has indicated that they do not plan to accept waste from other counties. The Board has requested the MPCA to allow the ash placed in the Kluver landfill to remain.

27. COMMENT: Concerned about the landfill after it closes, specifically settlement of the waste. (T17/2)

RESPONSE: The permit application proposed a closure/post closure and contingency action plan for the landfill. The permit application also proposed a financial assurance plan to cover the cost of correcting potential postclosure problems. As a mitigative action the DEIS suggested increasing the amount of this fund, and to increase compaction of ash in the landfill.

28. COMMENT: How will the upward seepage of ground water effect the integrity of the flexible membrane liner? Could the waste become contaminated and has a landfill with a membrane been constructed in the state? (47, 72, T14/16,19)

RESPONSE: The groundwater collection system is designed to maintain water levels below the liner grade elevations. An upward gradient is anticipated to occur during the time period following construction of the groundwater collection system and placement of the liner system, but would be removed by the drainage layer. In the event that the drainage layer did not function, the groundwater would exert an upward seepage pressure on the bottom of the liner. As addressed in Comment 17, the hydrostatic head of the till "perched" water table occurs at an elevation of maximum of ten feet greater than the top of liner elevation. The design waste grades indicate waste and soil materials replaced on top of the liner of a thickness exceeding 40 feet. The downward pressure exerted by the waste and soil materials is anticipated to greatly over compensate for the upward pressure resulting from the till "perched" groundwater.

Membrane liners are functioning satisfactorily at the Olmsted County - Kalmar landfill in Minnesota, and is being proposed in Renville County and Marshall/Kittson Counties.

29. COMMENT: Are there any rules that prohibit the lowering of ground water at site?  
(47, T16/21)

RESPONSE: The MPCA has no rules prohibiting the lowering of ground water at the site.

30. COMMENT: How do the environmental impacts associated with such landfills compare with those which place waste above the water table? (47)

RESPONSE: The groundwater is not anticipated to contact the waste because the design of the landfill includes a groundwater collection system overlain by a liner and leachate collection system. The groundwater collection system is designed to maintain groundwater levels at elevations below the bottom of the liner. The system has the built-in safe-guard, in the event the groundwater collection system does not operate properly, that the groundwater would be collected by the leachate collection system.

31. COMMENT: Winter operations will be difficult. Wind and snow will make the ash hard to control, and frozen ground will make covering it difficult during extended periods of 20 below weather. Will the ash coming to the site be frozen? (48, T36/14, T37/2,7, T40/7)

RESPONSE: While winter operations require specific operational practices for landfills in Minnesota, the SWB has been currently operating the proposed method ash handling system for several years. The operating permit for the landfill would take into account specific operational difficulties occasioned by winter conditions such as snow and freezing conditions. Frozen cover material would not be allowed for landfill operations. Wind is an operational item which the Solid Waste Board would be required to address for both winter and summer operations.

32. COMMENT: Who will keep the systems operating after the landfill is closed? (64)

RESPONSE: The Solid Waste Board would be responsible for operating the landfill site following closure. In the event that the Solid Waste Board were to become a non-entity, then Pope and Douglas Counties would be

responsible for the landfill. The Financial Assurance Plan contains a fund to pay for post landfill operation.

Current state regulations require a minimum of 20 years of monitoring and other maintenance after the landfill closes. After 20 years, an evaluation is made, based on monitoring results, as to whether further monitoring is required. The 20 year requirement may change to 30 years after the Federal regulations become effective on October 9, 1993.

33. COMMENT: Litter should not only be picked up daily on the site but should also be picked up around the general area. (61)

RESPONSE: This comment is noted. Any landfill permit, which may be issued, would require site cleanliness.

34. COMMENT: A security fence should be installed around the fill site and retention pond. (48)

RESPONSE: This comment is noted. These were mitigative measures suggested by the DEIS.

35. COMMENT: Noise controls will be important. (48)

RESPONSE: The Minnesota Pollution Control Agency would require that the noise level not exceed those allowed by Agency regulations.

36. COMMENT: Will the synthetic covers be resistant to pests? (48)

RESPONSE: There are no documented cases of pests destroying synthetic covers.

37. COMMENT: An office should be set up to not only take complaints about litter or excessive odors, but it should also be responsible for notifying people in the area about problems at the landfill such as fire, vandalism, spills, and so on. (48)

RESPONSE: The Minnesota Pollution Control Agency would consider an operational requirement of notifying the public of problems which may develop at the landfill in any permit issued.

38. COMMENT: Accurate and complete lab reporting is necessary. (48)

RESPONSE: A laboratory Quality Assurance/Quality Control (QA/QC) would be required by the Minnesota Pollution Control Agency in accordance with the Solid Waste Rules.

39. COMMENT: Supports the several design alternatives and mitigation measures which are listed in the DEIS. (57)

RESPONSE: Support for the items identified in the Draft EIS is noted.

40. COMMENT: The DEIS points out that the proposed landfill needs to be redesigned to comply with current solid waste rules. Other design and monitoring changes suggested here and/or mentioned in the DEIS would substantially reduce both the likelihood of a catastrophic failure and the likelihood of drinking water impacts in the event that a landfill failure results in ground water contamination. (57)

RESPONSE: This comment is noted.

41. COMMENT: The DEIS fails to address the operation of a proposed 25,000 gallon ground water collection tank, including testing requirements and alternatives to the proposed methods the discharged water. (58)

RESPONSE: An operation and maintenance program for the groundwater collection system and associated components, including a groundwater collection holding tank, were previously recommended to be included as part of the permit requirements for the facility. The environmental monitoring program, consistent with the quality assurance/quality control procedures to be used for the environmental monitoring system, also recommended a 25,000 gallon holding tank is constructed to the facility. The sampling frequency and parameters to be monitored should be consistent with the solid waste rules. In the event

the monitoring program detects contaminated water within the holding tank, the DEIS states that water would have to be treated or used as quench water at the waste to energy facility.

42. COMMENT: Is the new recycling program based on a drop off system or a collection system? (66)

RESPONSE: The new Household Hazardous Waste facility is scheduled to be open to accept waste in November of 1992. This will be a drop off facility backed up by a strong education campaign.

The Board has operated a MSW recycling program since 1988. This program consists of curbside collection in populated areas and drop boxes in rural areas.

43. COMMENT: With the steep slopes that are planned there is more potential for erosion problems. (68)

RESPONSE: A method of erosion control is discussed in the permit application. The DEIS noted that measures beyond those proposed in the application would be necessary to mitigate potential environmental degradation. Any permit issued for the facility would include erosion control requirements.

44. COMMENT: The site does not have enough room for the projected growth in Douglas and Pope Counties. (68,70)

RESPONSE: The permit application is for a 30-year life. The DEIS calculated the volume of waste likely to be deposited in the landfill and confirmed that the values corresponded quite closely to the permit application. The DEIS actually estimated that less waste would likely exist than proposed by the permit application.

45. COMMENT: Concerned that the county may expand the site in the future. (70, T18/24)

RESPONSE: The SWB has not indicated an intention to utilize the landfill beyond the proposed 30-year period.

46. COMMENT: On page 6-3, the DEIS concludes "in summary, it appears that of the sites offered for sale, the Solem township site was the most environmentally and locationally desirable site for a landfill". This statement should be rephrased so it does not appear that the MPCA supports the selected site. (T49/10,18, T51/5,13)

RESPONSE: The "Scoping" document requires the MPCA to identify the reason the SWB chose to pursue the identified site. The above statement in the DEIS identifies the SWB's reason for pursuing the site,

47. COMMENT: The policing of incoming waste loads should be done through a committee set up that would include people from Grant County and the City of Hoffman. (72)

RESPONSE: The local community (counties, cities, townships) may establish any waste monitoring enforcement program they choose. The MPCA reviews solid waste reports and performs facility site inspections to assure that the facility is being operated in accordance with the permit and the solid waste rules.

48. COMMENT: Does the incinerator accept any industrial waste other than the waste coming from the 3M plant? If so, what type is it? Will industrial waste be accepted at the new ash/bypass landfill? (72, T15/12)

RESPONSE: At the present time, the Waste to Energy plant only accepts the sandpaper waste from the 3M companies plant in Alexandria. When the Board's total solid waste system is complete, small amounts of industrial waste will be accepted at the Board's facilities pursuant to the Industrial Solid Waste Management Plan approved by the MPCA in January of 1992.

49. COMMENT: When siting a landfill doesn't the County have to have an alternative site available in case the first one is rejected? (T11/13)

RESPONSE: The County is not required to have an alternative site available.

50. COMMENT: The draft EIS should examine the existing plants located at the site. (T17/20)

RESPONSE: A Prairie Survey was conducted as part of the Environmental Impact Statement. Section 4.4 of the DEIS contains a summary of the plant species present on the site.

51. COMMENT: Who will be responsible for the ongoing operations of the facility especially after it closes and who will be responsible for doing the monitoring testing? (T30/20, T56/13)

RESPONSE: The Pope/Douglas Solid Waste Board will be responsible for the post closure care and monitoring. They would be required to retain the services of qualified consultants and laboratories to assist as necessary.

52. COMMENT: What training will be required for the people who would be running the landfill. (T45/2,14,19,22, T46/2,5,21,25, T47/7)

RESPONSE: The MPCA provides a three day classroom training course for landfill operators. Landfill operators must successfully complete this course to become a certified landfill operator. The MPCA requires that at least one employee at the landfill be a certified landfill operator.

53. COMMENT: The population of Hoffman is 624, not 575 as stated in the draft EIS. (T44/2,8)

RESPONSE: This comment is noted. The 1990 census identified the population at 575.

54. COMMENT: Is the life of the facility based on tonnage that can be delivered to the landfill and not on years? What happens if waste is delivered to the landfill faster than anticipated? (T55/16)

RESPONSE: Solid waste permits are written to cover specific periods of time as well as a specified volume of material, which ever comes first. If

waste is delivered at rates faster than anticipated, the landfill would be full before the permit period expires.

55. COMMENT: If the City of Hoffman refuses to provide fire protection for the landfill what other options are available? (T55/22, T56/4)

RESPONSE: Fire protection at the landfill is the responsibility of the Pope/Douglas Solid Waste Board. The MPCA does not offer options.

56. COMMENT: Has the ash sampling protocol been validated to determine if samples are representative of the ash being sampled? (47, 68, T16/24)

RESPONSE: The sampling protocol used for determining the elemental composition of the ash from the Alexandria incinerator was that specified by the MPCA (Minnesota Temporary Program for Ash Management [1988] pursuant to MN Stat. 115A.97 Special Waste: Incinerator Ash). This protocol does address representativeness of the sample data to the source material.

57. COMMENT: In a permit, may MPCA require ash samples be taken at random times, or are they taken at scheduled times? Are the ash samples attained at a frequency such that the ash being sampled is representative of the ash which will be disposed of at the landfill? (47, 69, 70)

RESPONSE: There would be a requirement for quarterly ash sampling and testing, plus an annual test consisting of a composite of the four quarterly tests. The municipal waste combustion permit needs to have an ash sampling plan approved by the MPCA. The MPCA requires that the quarterly samples be taken within seven days of January 15, April 15, July 15 and October 15 of each year. Note that this is a requirement for the incinerator and not the landfill. The landfill is required to submit quarterly leachate testing results as well.

To address the second question, a statistical analysis was conducted on the analytical data used in this study. The chemical composition data of the Alexandria incinerator combined ash originated from samples

collected during four sampling events over 2+ years: September 8, 1989; June 18, 1990; September 26, 1990; and January 18, 1991. Four individual ash samples were separately collected and analyzed during three of these sampling events. The fourth sampling event included six individual samples. This approach thus lead to the collection of a total of 18 individual analytical samples over the course of 2+ years.

For this analysis, the data from each event were pooled and then the means and 95% upper confidence levels of these means calculated. The standard deviation of the data and the t-distribution with n-1 degrees of freedom (percentile set at 0.975) were used in this calculation (Dunn, 1977). The following table provides the resultant data for six of the metals of importance to this risk assessment (a total of seventeen metals were evaluated, however). These six metals were selected in the chemical screening process of the risk assessment and were used in the ecological risk assessment calculations: aluminum, cadmium, copper, lead, mercury and zinc. In addition, the means and upper confidence levels (UCLs) for these metals, as calculated from the total combined database (i.e., the database used in both the chemical screening process and the risk calculations in the risk assessment), are presented for comparison purposes.

(SEE TABLE ON FOLLOWING PAGE)

**SUMMARY OF SELECTED STATISTICS REGARDING CHEMICAL COMPOSITION OF INCINERATOR ASH**

ALUMINUM			CADMIUM		
Data Set	Mean (ppm)	95% UCL (ppm)	Data Set	Mean (ppm)	95% UCL (ppm)
Combined*	17672	20794	Combined*	21	24
1	23250	31706	1	31	35
2	20500	26929	2	20	22
3	17000	23750	3	23	27
4	12517	18533	4	14	15

COPPER			LEAD		
Data Set	Mean (ppm)	95% UCL (ppm)	Data Set	Mean (ppm)	95% UCL (ppm)
Combined*	1805	3024	Combined*	652	870
1	2620	9500	1	540	815
2	1798	3234	2	520	987
3	1608	4682	3	805	1972
4	1398	3909	4	712	1255

MERCURY			ZINC		
Data Set	Mean (ppm)	95% UCL (ppm)	Data Set	Mean (ppm)	95% UCL (ppm)
Combined*	0.49	0.59	Combined*	2456	3131
1	0.27	0.32	1	3550	7039
2	0.55	0.67	2	1575	1847
3	0.75	0.99	3	3150	4846
4	0.42	0.53	4	1850	2408

\* Combined data set: Statistics performed on all data points combined from each separate data subset. The 95% UCL for the combined data set was used in the chemical screening process.

A statistical evaluation was then performed to assess whether the observed differences in the mean data among the sampling events were statistically significant. For each metal examined, a confidence interval was determined for the difference in mean among the data subsets (sampling events). This confidence interval was determined by the methodology described in Dunn (1977, page 71) which applies to unpaired data with an unknown population variance (using the t-distribution at the 0.975 percentile). For a majority of the analysis conducted, the difference in means was determined not to be statistically significant. (The difference in means was statistically significant in several cases, e.g. for cobalt, when based on one-sided hypothesis testing between means, as shown on page 93 of Dunn.) Therefore, due to the fact that the majority of the data on the elements evaluated were not found to be statistically different, it may be concluded that the data presented are in general consistent, and thus are adequate in terms of being representative of the ash.

References: Dunn, Olive Jean: Basic Statistics, A Primer for the Biomedical Sciences; 1977, John Wiley and Sons, Inc.

58. COMMENT: Why are the lead concentrations reported for the ash significantly lower than the concentrations reported in the literature? (47)

RESPONSE: The literature data represents that obtained over large areas of the United States and covers a relatively long period of time. During recent years, the implementation of recycling a new hazardous material handling regulations, and other waste abatement practices have created "cleaner" waste streams.

59. COMMENT: Concerned that in many cases, the maximum concentrations reported from the ash testing are significantly lower than the maximum concentrations reported on the literature. (47, T16/24)

RESPONSE: See Comment 58.

60. COMMENT: Concerned that covering the ash every other day will be inadequate to keep it from blowing off site. (48, 62,)

RESPONSE: This concern would be considered by the Minnesota Pollution Control Agency in the event that the Pope-Douglas Solid Waste Board should

consider to pursue another permit. Mitigative action to reduce a potential environmental impact would be to cover the ash daily.

61. COMMENT: How will ash be contained when there is a 7 or 8 inch rain fall? (62)

RESPONSE: Rainfall upon the ash surface will be contained with the diked cells and will be collected by the leachate collection system. In the unlikely event that a rainfall would exceed the capacity within the cells, the runoff would flow overland to the perimeter collection ditch which drains to the stormwater retention pond. The storm water detention basin is included as part of the monitoring system for the facility and would be sampled to assure water quality compliance.

62. COMMENT: What steps will Pope/Douglas perform to decrease the volume and toxicity of the ash coming from the incinerator. (T26/14)

RESPONSE: The Pope-Douglas SWB will be required to implement a household hazardous waste collection program, which will divert toxic and hazardous materials away from the incineration.

The SWB will also be required to comply with the state recycling requirements to reduce solid waste volumes.

63. COMMENT: Concerned about the leachate that would be generated at the landfill. (31, T20/2)

RESPONSE: Leachate generated in the landfill would be collected and returned to the incinerator for use as quench water. Leachate would be tested for numerous chemical components. The MPCA has the authority to require separate treatment or other mitigative action if it appears that environmental problems could develop.

64. COMMENT: Do the rules require leachate to be treated? Is using leachate as quench water considered a type of treatment? (69)

RESPONSE: The solid waste rules require a plan for adequate disposal of leachate. The MPCA has determined that the use of leachate as quench water is an acceptable disposal method. The SWB would also be required to provide a definite "back-up system" for leachate disposal (such as a wastewater treatment plant) in the event that use as quench water was not acceptable or available.

In the event that it appears that Minnesota water or air quality standards could be violated due to the use of leachate as quench water, the MPCA has the authority to require alternate disposal methods.

65. COMMENT: If leachate is used a quench water at the incinerator, will it result in the leachate becoming stronger and stronger (34, 47, 70, T53/8)

RESPONSE: In an attempt to quantify a potential increase in leachate concentration, a history of leachate concentration at the Northeast Otter Tail landfill was reviewed.

Solid waste from Otter Tail County and surrounding counties is burned in a mass burn facility in Perham, similar to the Alexandria waste-to-energy facility. Leachate from the landfill has been collected for a period of two years, and sprayed on the waste at the Perham incinerator for combustion control. The following table contains leachate concentration from samples collected in July 1990 and July 1991. Of 10 metals tested, three increased in concentration, five decreased in concentration, and two were below the detection level in both tests. The data is inconclusive as to whether the concentration has increased.

**Leachate Concentrations  
of  
Various Metals  
Northeast Otter Tail Ash Landfill**

<u>Parameter</u>	<u>July 1990</u>	<u>July 1991</u>
Arsenic	< 2 ug/l	2.52 ug/l
Cadmium	10 ug/l	0.2 ug/l
Chromium	< 50 ug/l	<1 ug/l
Copper	50 ug/l	80 ug/l
Lead	100 ug/l	7.6 ug/l
Manganese	4260 ug/l	2350 ug/l
Mercury	< 0.2 ug/l	< 0.2 ug/l
Nickel	100 ug/l	0.18 ug/l
Selenium	< 2 ug/l	5.1 ug/l
Zinc	390 ug/l	<10 ug/l

(< means less than) (ug/l means micrograms per liter)

66. COMMENT: The proposed ash landfill does not have separate leachate collection systems for the ash cells and the MSW cells. (43)

RESPONSE: The Solid Waste Rules do not require separate leachate collection systems for ash and MSW bypass. The rules do require separate cells. As proposed, the system does enable the SWB to monitor the ash leachate and MSW leachate individually.

67. COMMENT: How will odors associated with the leachate be managed during ash quenching operations? (47, 61, T52/24)

RESPONSE: The permit application did not address odor management as may be required because of ash quenching operations. Mitigative action for odor control includes odor scrubbing of quench areas, transport of quenched ash in enclosed vehicles, and immediate covering of ash.

68. COMMENT: How long will the leachate collection system be operated and what criteria would be used to determine when it can be stopped? (47, 61, T15/3)

RESPONSE: The leachate collection system would be operated at a minimum through the operating and post closure period. The collection of

leachate would be terminated only if environmental monitoring shows that the applicable test parameters are being met. Also refer to Comment 32. (pg. 3-18)

69. COMMENT: Where will the leachate be treated if the incinerator is shut down, or for the extended period of time required for treatment after the landfill closes? Can leachate be treated on the site by land application. (47, 64, T20/17)

RESPONSE: The Pope-Douglas Solid Waste Board would be required to provide treatment in either a public wastewater treatment plant or a private wastewater treatment facility.

Land application of leachate is an acceptable practice, however, sites are evaluated case by case and must meet certain criteria. Land application of leachate at the Pope/Douglas site has not been proposed.

70. COMMENT: Why won't the wastewater treatment plants in Alexandria or Glenwood treat the leachate? (70)

RESPONSE: The SWB has approached both Alexandria or Glenwood relative to treatment of leachate. The City of Glenwood spray irrigates their wastewater on farmland and the township would not approve the proposal. Alexandria expressed concern that the leachate would affect their ability to meet their effluent standards and chose not to accept the wastewater at this time.

71. COMMENT: Why will only 2/3 of the leachate be used as quench water and will the remaining be discharged to the Chippewa River. (70, T20/11)

RESPONSE: The DEIS identifies that the quench water demand would utilize all of the leachate which is anticipated to be produced, as well as a portion of the collected groundwater, if desired. If all the collected groundwater were to be returned to the incinerator as quench water, the volume of leachate plus groundwater would exceed the volume required for quenching. If groundwater is not contaminated so it

meets water quality standards, the SWB would be permitted to discharge it to the Chippewa River.

72. COMMENT: What is leachate? (T27/14)

RESPONSE: When precipitation (rain and snow) falls upon the landfill surface, a small portion of the water will penetrate the landfill cover and will percolate through the waste. As it passes through the waste, chemicals dissolve out of the waste into water, creating leachate.

## B. GROUND WATER

1. COMMENT: Concerned that the draining of the perched water table will have an impact on area wells. (34, 60, 61, 62)

RESPONSE: The groundwater collection system is designed to lower the elevation of the till "perched" water table underlying the landfill cells. The zone of influence of the dewatering of the perched water table was calculated using a finite difference computer model. The calculated dewatering resulting from the groundwater collection system would be a lowering of the till "perched" water table approximately 0.5 feet at the property boundary. The zone of influence outside of the property boundary would be less than 0.5 feet, tapering off away from the property boundary. The drawdown associated with the groundwater collection system would occur solely within the upper surficial clay geologic unit, due to additional saturated clay under the collector and an unsaturated zone at the top of the outwash unit. Residential water wells in the vicinity of the landfill site obtain their water supply from an underlying "outwash" sand unit located beneath the surficial clay. Therefore, the dewatering associated with the groundwater collection system will not have an impact on water wells in the vicinity of the landfill site.

2. COMMENT: Concerned about the possible impact of the landfill on the ground water in the area and how long it would take to clean up. (39, 40, 59, 61, 65, 66, T12/8, T18/4)

RESPONSE: The groundwater contamination potential at the proposed landfill site is considered relatively low. The site geologic conditions consist of a relatively low permeability clay layer at the ground surface extending the minimum of 10 feet below the base grade of the liner system. The presence of the clay till layer will assist in impeding downward migration of potential contaminants. The proposed engineering design of the landfill system includes a leachate collection system, liner system, and a groundwater collection system.

The groundwater collection which will be located underlying the liner will serve as a backup collection system in the event leachate migrates through the liner system. This will effectively serve as a secondary collection system to reduce the amount of leachate that potentially escapes into the underlying groundwater. The site would also have a monitoring system which is designed to detect migration of contaminants away from the landfill cell area. The landfill plans are required to include contingency action plans in the event groundwater underlying the site becomes contaminated above solid waste intervention limits. Given the site geologic setting, engineering design and proposed monitoring system, the groundwater contamination potential can be considered relatively low.

3. COMMENT: Concerned about the placement of industrial and hazardous waste being placed on top of the water table. (44)

RESPONSE: At the present time, the waste-to-energy plant only accepts the sandpaper waste from the 3M Companies plant in Alexandria. When the Board's total solid waste system is complete, small amounts of industrial waste will be accepted at the Board's facilities pursuant to the Industrial Solid Waste Management Plan approved by the MPCA in January of 1992. Industrial hazardous waste would be excluded from the landfill.

4. COMMENT: Why wasn't the site also rejected because of high ground water like some of the other sites that were looked at. (47, 49,)

RESPONSE: The site selection process and the siting criteria established for landfills is up to the local unit of government. They must be consistent with the basic siting criteria published in the state solid waste rules. The reasons the Pope/Douglas SWB decided to select this site are examined in section 2.0 of the Draft EIS. High or shallow ground water would not disqualify a candidate site from consideration under the state solid waste rules. The site selection process used by the Pope/Douglas Solid Waste Board was looked at in great detail in the DEIS and can be found in Section 2.0 of the DEIS.

5. COMMENT: How much of the proposed landfill site extends over a water table that is not perched, and did the evaluation presented in the DEIS consider that? (47)

RESPONSE: The majority of this site consists of a perched water table located within the surficial till unit underlain by a water table within the outwash sand unit. These two groundwater units do merge in the northwest corner of the site. The area of the base of the landfill cells and embankments is approximately twenty acres. The northwest corner of this area, a total of about one-half acre, is located in the part of the site where the till "perched" water table and outwash water table merge.

The terminology till "perched" water table was used to be consistent throughout the technical work papers and DEIS. It is acknowledged that the true definition of perched groundwater is not met for the groundwater regime throughout the entire site. The DEIS did not specifically address this aspect of the hydrogeology of the site because of the fact merger of the two water tables is a result of the base of the clay occurring at a lower elevation in the northwest corner of the site, causing the water table within the outwash unit to come in contact with the base of the clay. The potential environmental impacts are small due to the increased attenuation capacity for the clay barrier as well as the increased travel time for contaminants before reaching the outwash aquifer due to the greater thickness of clay at this location.

6. COMMENT: What water level data were used to evaluate the positions of the water tables. (47)

RESPONSE: Water level data from the monitoring wells at this site was available during the time period of 1986 to spring of 1990. These data were reviewed in preparation of the DEIS. The water level data obtained in 1989 was primarily used to determine the water level position because greatest number of water level monitoring points were available for these measurement dates. Comparison of 1989 data and 1986/1987 data indicates lower water levels during 1989. Lower water levels were interpreted to be a result of a drought period occurring in 1987/88 throughout the midwest. Water level data from 1986 and 1987 may have interpreted a higher position of the till "perched" water table underlying the site than was interpreted from the 1989 data. However, a sufficient number of data collection points did not exist at the site in 1986 to reliably interpret the till "perched" water table surface underlying the cell development area of the proposed landfill site. The water level data obtained during July of 1989 was used for calibration of the finite difference groundwater model when calculating the zone of influence from the groundwater collection system. Collection of additional water level data would assist in obtaining a better understanding of the site hydrogeologic characteristics.

7. COMMENT: Have the worst case conditions (i.e. periods of above normal precipitation) been considered in the evaluation of the water levels at the site. (47)

RESPONSE: See the response for Comment B6. (pg. 3-37)

8. COMMENT: Where will the ground water be treated if found to be contaminated for the extended period of time required following landfill closure. (47)

RESPONSE: Contingency action plans are required by the Solid Waste Rules for all landfill facilities. A contingency action plan typically includes

discussion of site activities to take place in the event groundwater contamination occurs during the operation, closure or post closure period. Also refer to Comment A69. (pg. 3-33)

9. COMMENT: Concerned about the safety of the drinking water in the area as well as the Chippewa River. (54, 60)

RESPONSE: Solid Waste Rules contain intervention limits which establish water quality standards required for compliance in the groundwater quality underlying the landfill site. The intervention limits, applied at the compliance boundary, would be monitored by the groundwater monitoring wells for the facility. These intervention limits are approximately 25% of the corresponding drinking water standards (Minnesota Department of Health Recommended Allowable Limits) for a particular contaminant. Additionally, solid waste rules require compliance with surface water standards in accordance with Chapter 7050 of the Minnesota Rules for a surface water body which is potentially impacted by a landfill operation. These groundwater and surface water standards will be used to maintain acceptable water quality levels resulting from the landfill operations.

10. COMMENT: If vertical flows dominate, the till monitoring wells are too far away from the landfill to detect leakage and the first indication of a problem will be seen in the sand aquifer wells. The one initial downgradient well in this unit is not a sufficient safeguard. We suggest that all three planned downgradient wells be constructed initially, and that at least the water levels be monitored, so that flow in this aquifer can be determined, and an appropriate well be included in the regular sampling and analysis. (57)

RESPONSE: This comment suggests that the proposed three (3) down gradient wells screened within the outwash water table unit should be constructed during the initial landfill development. The schedule for the landfill construction and corresponding monitoring well construction has not been developed to date. The monitoring wells at the site can be constructed following construction of the embankments. Since Well #1

is the downgradient cell, it would appear that the downgradient wells could be constructed initially.

Placement of the downgradient wells would assist in defining the groundwater flow direction within the outwash unit. Assuming that the entire embankment is constructed at the same time prior to the facility, the monitoring wells can be constructed prior to beginning placement of refuse within the landfill. Existing wells screened within the till "perched" water table have indicated a strong downward gradient suggesting a significant downward flow component. Construction and subsequent monitoring of groundwater wells in both the till "perched" water table unit and outwash water table unit would provide the most appropriate safeguards for determining groundwater quality impacts.

11. COMMENT: In general the investigations and analysis summarized in the Technical Work Paper 4, 5, and 6, appear to be complete and appropriate. (57)

RESPONSE: This comment is noted.

12. COMMENT: The Minnesota Department of Health (MDH) main concern is that the uppermost aquifer that could be impacted by this landfill is used locally for both private and municipal water supplies. The site has been well studied and, from a ground water perspective, it appears to be suitable for a landfill. The only real concern is presented by a sand aquifer that underlies a relatively thin zone of clay till that is directly under the landfill. This is the major potable water aquifer for the area. If the designed features of the landfill function properly, there is little chance that this aquifer will be impacted without sufficient warning. If these features fail, there is an approximately even chance that the monitoring well network will not provide adequate warning of ground water impacts. (57)

RESPONSE: The proposed landfill design has features which are intended to minimize the impacts to the environment. The effectiveness of the landfill design requires proper construction followed by operation and

maintenance. A rigorous quality control program during construction will assist in assuring the system is properly constructed. The leachate collection system and groundwater collection system require ongoing maintenance in order to ensure continued effective operation. An operation and maintenance plan for maintenance of these systems will be necessary. The proposed landfill has a groundwater monitoring system with proposed wells screened in the till "perched" water table and underlying outwash water table.

Groundwater flow underlying the cells is generally towards the northwest. The groundwater monitoring system appears to be placed in suitable locations to intercept contaminants which may reach the groundwater. Protection of the environment will be most effective if the final engineering design aspects are properly constructed and maintained in addition to an on-going groundwater monitoring program.

13. COMMENT: Since different methods were used to estimate horizontal and vertical hydraulic conductivity, it is uncertain that these values are comparable. This uncertainty is amplified when the broad range of these measured values is considered. We regard the horizontal and vertical values as close enough to suggest that they are essentially the same. Without a well defined flow direction, several wells may be necessary to detect any release from the landfill. (57)

RESPONSE: The hydraulic conductivity of the geologic materials at the site was determined using laboratory and field methods. Horizontal hydraulic conductivity was determined in the field performing slug tests on the groundwater monitoring wells. The vertical permeability was estimated by performing laboratory tests. The range of values obtained may be attributed to the variability in the geologic materials at the site. However, laboratory conductivity values are reported to be consistently one to two orders of magnitude lower than field hydraulic conductivity values. The horizontal versus vertical flow component within the till "perched" water table unit is not specifically known.

The proposed groundwater monitoring system consisting of nested wells with a well screened in the till unit and a well screen in the outwash unit is the most suitable means to detect water contamination which may be migrating down gradient from the landfill site. The proposed number of wells appears to be suitable for detecting landfill contaminants. The MPCA has authority to require additional monitoring wells in the event groundwater contamination is detected in the monitoring wells.

### C. SURFACE WATER

1. COMMENT: The United States Fish and Wildlife Service currently owns 35 Easements for Waterfowl Management Rights within a 5 mile radius of the landfill. These easements are perpetual, and prohibit burning, draining, filling, and leveling of wetlands. (1)

RESPONSE: If the landfill moves into the permitting process, the United States Fish and Wildlife service would be given the opportunity to respond to proposed facility design.

2. COMMENT: Concerned about storm water runoff from the site, how it will be controlled and how it might impact the Chippewa River, and land that it flows through. (8, 38, 40, 47, 59, 60, 61, 68, 70, T13/23, T18/7, T38/25)

RESPONSE: The permit application design proposed one detention basin which would capture only a portion of surface runoff from the site. The landfill as designed will increase surface water runoff rates of discharge and increase runoff volume relative to pre-developed conditions. The MPCA will require the Solid Waste Board to consider additional detention basins and/or design modification to the drainage system to minimize downstream impacts in revised permit applications. See comment C4. (pg. 3-42)

3. COMMENT: What standards would be used when the water in the ground water retention tank is tested prior to its release? Do these standards

encompass all the testing necessary to demonstrate that this leachate will not prove harmful to the environment? (43)

RESPONSE: The proposed plans for the landfill include discharge of collected groundwater through the culvert underlying the Township road and into adjacent surface water bodies. Accordingly, the MPCA would require the facility discharge water to comply with Minnesota Rules Chapter 7050. The discharge would be required to be monitored and comply with acceptable discharge limits are established in Minnesota Rules Chapter 7050.

4. COMMENT: It may be possible to limit the peak rate of discharge to pre-landfill conditions, but not the total volume of discharge. (47)

RESPONSE: Storm water runoff from the site is influenced by the amount of evapotranspiration and impedance created by the vegetation. The volume of storm water runoff will increase as land is disturbed during construction. As a portion of the landfill is "closed" and the vegetation is reestablished, the runoff volumes will likely decrease. A portion of the runoff will be captured within the open landfill cells and will be treated as leachate. The excavation proposed between the pre-developed easterly sub-basin and the westerly sub-basin would have the greatest impact for increasing the runoff volume. This excavation would result in an additional 47 acres to the watershed contributing surface water to the northwest discharge location from the site. The use of detention basins would provide the opportunity to hold the additional storm water on site and release at a rate allowing the downstream runoff to dissipate prior to discharging the water from the site. The detention basins, except for minimal evaporation, would not reduce the total volume of water discharging from the site. The additional storm water runoff volume will result in the soils being saturated for a longer time, which could result in a change in wetland and vegetative characteristics.

5. COMMENT: It is inappropriate to drain the landfill directly into the next county. (48)

RESPONSE: A portion of the pre-developed landfill site currently drains through the 36 inch pipe into Grant County. To discharge water into the adjacent county at rates which match pre-developed rates would minimize the potential downstream flooding effects. Emergency contingency plans or structures would be developed to prevent spills or releases from discharging into the adjacent county or lands.

6. COMMENT: Concerned that one detention basin for surface water runoff will be inadequate. A second retention basin should be added. In addition a control valve should be installed on the 36-inch culvert for use in emergencies like a basin over-flowing, a washout, or the leachate tank rupturing. (43, 48)

RESPONSE: There is a deficiency in the current design of the detention basin. It is not sized adequately, does not incorporate all the landfill activities nor does it address emergency conditions. The MPCA has made recommendations for adding additional detention facilities. The design of the landfill drainage system must address these deficiencies if permitting continues to be pursued by the Solid Waste Board.

7. COMMENT: How many acres of watershed are on the property? (T38/24)

RESPONSE: Section 4.2 of the DEIS states that "the landfill site is contained in a 129 acre subwatershed of the 1,000 acre watershed. The 129 acre subwatershed is comprised of two sub-basins. The easterly sub-basin consists of 47 acres and drains to a wetland in the east portion of the site. The westerly sub-basin consists of 82 acres and drains to a central swale/wetland and discharges through a 36-inch culvert located 100 feet north of the northwest corner of the site.

8. COMMENT: The proposed plan leaves too many questions unanswered concerning its impact on the wetlands on the site and those immediately adjacent. Inadequately described effects include constructing a drainage swale to eliminate ponding on the eastern portion of the site; the drainage discharge to the northwest into the wetland in Grant County; and the

effect of erosion and runoff from inadequate cover into adjacent wetlands. (43)

RESPONSE: The Pope-Douglas SWB has not addressed the wetlands regulated by the Army Corps of Engineers or wetlands under the Minnesota 1991 Wetland Conservation Act which are contained on site. The SWB also has not addressed filling or draining of wetlands that may occur due to construction activities. The avoidance, minimizing and/or mitigation issues for wetland alteration or compensation have not been addressed.

Avoidance and/or minimization of wetland encroachment and/or impacts will need to be evaluated by reviewing alternatives of the landfill configuration and/or providing adequate compensatory mitigation of wetlands. The wetland mitigation process will need detailed documentation prior to landfill permitting. Permits will be required from the Local Government Unit (LGU) in accordance with the 1991 Wetland Conservation Act as well as the Army Corp of Engineers (COE) Section 404 permit. The Solid Waste Board must address these issues if they continue to pursue the permitting of the landfill.

9. COMMENT: Has the proposer followed the mitigation sequencing required by the 1991 Wetland Conservation Act, i.e., avoid, minimize, rectify, and possibly, replace. Can the site be reconfigured to avoid taking any wetlands. If it is to be replaced where would it be done? (43, 62)

RESPONSE: See comment C8. (pg. 3-44)

10. COMMENT: The environmental impacts to the Grant County wetland and the Chippewa River associated with the increase in runoff from the site have not been evaluated. (47)

RESPONSE: The Health Risk Assessment evaluated the impact of landfill chemicals which could runoff from the site to the Grant County

wetland and to the Chippewa River. (See Section 4.5.2 of the Draft EIS.)

11. COMMENT: Why wasn't the proposed site rejected due to the presence of wetlands? (47)

RESPONSE: The site selection process was completed prior to passage of the Minnesota 1991 Wetland Conservation Act, which contains many of the regulations affecting wetland. See Comment C8. (pg. 3-43)

12. COMMENT: Water that drains through the culvert should be altered in order to keep potentially contaminated water out of the pasture. (48)

RESPONSE: Stormwater discharge from the site would have to be monitored and comply with MPCA determined standards. The SWB would be required to develop an emergency operating plan or containment system along with a monitoring program.

13. COMMENT: The DEIS fails to discuss effects of construction on the seven acres of wetlands at the site or suggest mitigation. Replacement of existing wetlands with the proposed surface water retention pond would not be acceptable as this pond will require periodic dredging, greatly reducing its function as a wetland. (58)

RESPONSE: See comment C8. (pg. 3-43) It was not the intent that the on site detention basin be considered as mitigation or compensation for filling or degrading on site wetlands.

#### **D. AIR QUALITY**

1. COMMENT: Concerned about air pollution from the Landfill. (39, 44, T53/19)

RESPONSE: The air quality human health and environmental risk assessment specifically addressed the magnitude of the potential air pollution that this facility might cause in the future and its likely effect on human health. The potential air pollution was estimated using worst-case

assumptions - - volatile chemicals were assumed to be emitted into the air indefinitely at rates applicable only for full landfills immediately after closure; fugitive ash dust was calculated assuming the ash was completely dry (0% moisture) and completely exposed to wind erosion on the land surface. Human exposure (RME) to this potential air pollution was then modeled assuming that an individual would live directly south of the facility, i.e. in that geographic location where the air pollution from the landfill would be expected to be the greatest, 24 hours a day, 365 days a year for 70 years. Even under these extreme exposure conditions, the calculated air pollution was shown not to be a health concern from either a short-term exposure stand-point or with respect to long-term chronic exposure. Only one chemical was shown in the analysis to potentially be at significant concentrations in air. That chemical, 1,2-dichloroethane, was associated with a lifetime excess cancer risk of 3 in 100,000. The Minnesota Department of Health has concluded, however, that due to the methodology used in this assessment this calculated risk is an over-stated value.

2. COMMENT: The MPCA should consider requiring the installation of a burn-off (flare) for the landfill gas to reduce ecological and human health air quality risk. Additional methods of control/utilization of this landfill gas should also be investigated and included in the final EIS. To address these issues, more information needs to be included in the final EIS regarding the amount of landfill gas expected to be collected at the Pope/Douglas Landfill. (43)

RESPONSE: These suggestions would be considered by the Minnesota Pollution Control Agency in the event that the Pope-Douglas Solid Waste Board should pursue permitting activities.

3. COMMENT: Why wasn't the proposed site rejected due to exposure to the wind? (47)

RESPONSE: The Minnesota Pollution Control Agency Solid Waste Rules do not restrict landfill siting due to possible exposure to the wind.

4. COMMENT: Given the estimate of a non-negligible lifetime cancer risk at a reasonable maximal exposure (three in 100,000), consideration should be given to installation of a gas collection system and permanent landfill gas monitoring system. (57)

RESPONSE: This comment will be considered in the event that the Solid Waste Board should continue to pursue a permit. Refer to Comments D1 and D2. (pg. 3-58, 59, 60)

5. COMMENT: Concerned about the high winds that blow through the area, resulting in litter and ash being blown off site. (61, 62, 65, T36/10,16 T37/12,20 T38/6 T40/19 T55/21)

RESPONSE: The permit application identifies that during periods of high wind, the filling operations would be discontinued. In the event that the Solid Waste Board should continue to pursue a permit for the facility, a permit condition relating to wind operation would be considered for the permit.

6. COMMENT: Who will determine when it is too windy to continue operations at the landfill, and what happens when its shut down? (48, T39/4, T40/6)

RESPONSE: The landfill operator would be responsible for determining when the landfill should be shut down for wind. This requirement would be included in the MPCA operation permit. The operator would also be responsible to collect litter caused by blowing wind.

#### E. PRAIRIE

1. COMMENT: Discussion of the existing character of the site's prairie remnants, and suggestions for mitigating any project impacts was not adequately integrated into the rest of the document. The final document should be consistent in both executive summary and the body of the document on these and other, aspects of this investigation. (2)

RESPONSE: The results of the prairie survey as discussed in Section 4.4.3.2 were misstated in the executive summary. The summary should have included the finding of the State-threatened Poweshiek Skipper. (See Section 4 of this FEIS.)

The executive summary in Section 1.10 also omitted the prairie mitigation options, which are presented in Section 4 of this FEIS.

2. COMMENT: The County should develop a management plan that will be designed to preserve and enhance the prairie remnant areas on the site. If this is not possible, the mitigation alternatives proposed in section 4.4.5 should be considered to compensate for the impacts of the project on the Poweshiek skipper. (2, 68)

RESPONSE: The MPCA agrees that the Pope/Douglas Solid Waste Management Board should develop a management plan for the prairie remnant on the site. The management plan would most likely be prepared as part of the permit application and be reviewed by both the MPCA and the Minnesota DNR. Mitigative measures to minimize any harmful impacts to the Poweshiek skipper and/or the Upland Sandpiper would be emphasized.

3. COMMENT: Prairie remnants of this type are not common in Douglas county and should not be further degraded by landfill development. The EIS is inadequate in reviewing proposed protection of the existing prairie vegetation and in the proposed mitigation for loss prairie. (8, 58)

RESPONSE: Currently there is 5.7 acres of remnant prairie located on the site of the proposed landfill. The current project design plans would directly impact the 4.1-acre Rank D remnant prairie located on the southern side of the site. The 1.6-acre Rank C prairie remnant located on the northern part of the property which is a higher quality remnant would remain intact (see RESPONSE to E2 (pg. 3-62)). The Draft EIS did recommend several mitigation measures as stated in section 4.4.5 of the Draft EIS. The Minnesota DNR in its comment letter pointed out that the suggested mitigative measures were not incorporated into the other

parts of the prairie section of the Draft EIS. The incorporation of this information would have made it clearer on how the prairie remnant would be protected.

4. COMMENT: The DEIS does not evaluate effects of construction, operation, blowing litter, noise, habitat loss, blowing ash, and closure activities on the prairie remnants or address the impact of those activities on animal species of State Special concern identified at the site. The Poweshiek Skipper, the Upland Sandpiper and others are known to frequent habitat in the immediate vicinity and suspected of occurring on the site. (58)

RESPONSE: The Draft EIS did examine in detail the potential impacts of construction and operations might have on the site as a whole including the remnant prairie. The Draft EIS did not specifically address the possible impacts of construction and operations practices on the remnant prairie. Construction and operation modification recommendations can be found in Section 4.1.8.3 of the Draft EIS. These mitigative measures will be recommended to be included as part of the solid waste permit for the landfill. Mitigative measures for the remnant prairie were also identified and can be found in sections 4.4.5 of the Draft EIS.

5. COMMENT: For the Upland Sandpiper, the survey dates failed to include peak migration periods (early May) or the period of resident population nesting activity (most of June). A thorough survey during optimal period would, no doubt, have discovered this species at the site. In regard to the above species of special concern the DEIS is contradictory in stating that "no rare or unusual biota" are present (p. 1-9). The DEIS is lacking in its assessment of the impact on animal species of special concern. (58)

RESPONSE: The prairie survey on the project site began during the end of May and missed the peak migration period of the Upland Sandpiper. However, the field biologists looked for signs of the Upland Sandpiper during their visits in May, June, July, and August. During that time

there were no visual sightings or calls heard to indicate the presence of the Upland Sandpiper at the project site. A study by Kirsch and J. Higgins, 1976, titled Upland Sandpiper nesting and management in North Dakota, Wilderness Society Bulletin 4:16-20, show Upland Sandpipers are more abundant and have higher reproductive success on higher quality sites. The Minnesota DNR found this to be a highly degraded site, and regarded it as a low priority site for protection.

However, the MPCA and DNR remain concerned about protecting biodiversity and habitat. Therefore, a remnant prairie management plan that would be required as part of the permit application will take into account the possibility of the existence of the Upland Sandpiper on the 1.6 acres of remnant prairie that will be managed on the site.

Refer to Comment E1. (pg. 3-47)

6. COMMENT: The Pope/Douglas Solid Waste Board (SWB) should purchase a better quality prairie remnant in Pope County (providing one exists) and transfer ownership to an appropriate land management agency such as the DNR. (58)

RESPONSE: This would be an option that the SWB could pursue as an effective mitigation measure available to them and acceptable to the Minnesota DNR and concerned citizens to address their concerns about the remnant prairie on the site. There is no legal requirement for such purchase.

## **F. HUMAN HEALTH AND ECOLOGICAL RISK**

1. COMMENT: The DEIS is contradictory in regard to the adverse ecological effects. On page 1-8 of the DEIS under 1.7.1.2 Ecological Risk, it is stated that A catastrophic release of leachate from the leachate holding tank would have a major ecological impact upon the wetland ecology and a slow continuous release of leachate to the till groundwater and subsequently to the wetland would be of "possible concern" as defined by the EPA. Yet, in the third paragraph of the same section, it is

stated that it seems reasonable to conclude that failure of the safeguards at this facility would not likely create significant negative effects upon the local biota. Please clarify these statements. (43)

RESPONSE: This comment is noted. Please refer to the addendum report addressing this issue.

2. COMMENT: More information is needed regarding background levels of contaminants already present at this site. (43)

RESPONSE: The MPCA searched available records and was unable to find either information or records on background levels of contaminants at the project site or suggestions that the past use of the site would cause a reason to be concerned that pollutants or chemicals of concern may be present on the site.

A properly constructed and operated landfill would not be expected to release leachate to the groundwater or pollutants into the air, and thus would not change contaminate levels at the site.

The landfill design includes measures to prevent potential release from the landfill. In the unlikely event of a release, additional safeguards are included to detect a release as soon as possible so it can be quickly corrected, or quickly detected. Mitigative measures identified to guard against a potential problem at the landfill can be found in Sections 4.5.2.7 and 4.5.3.7 of the Draft EIS. These mitigative measures would be further detailed during the permitting process. There are a number of measures that are already a part of the facility design and they include: a liner leachate collection system, groundwater collection system, ground and surface water monitoring, and testing for landfill gas. Operations plans also include measures to prevent releases to the environment.

3. COMMENT: The risk assessment presented in the DEIS does not consider the impacts associated with an ongoing release of leachate to the Grant

County wetland via surface discharge after the facility has been closed. (47)

RESPONSE: This scenario was addressed in the surface and ground water human health and environmental risk assessment study. Contamination of the perched water table by the landfill and its subsequent flow into the Grant County wetland was examined for its potential to adversely affect the aquatic biota present. The study indicated that if this scenario occurred, the collective concentration of all ground water constituents studied could present a risk to this area. However, it was calculated that it would require 4,600 years for this impact to occur once the landfill liner system failed.

4. COMMENT: Why isn't lead included in the list of Chemicals of Concern in most of the impact evaluation scenarios? (47, 69, T15/1)

RESPONSE: Lead was dropped as a chemical of concern in the air quality risk assessment since the lead level in the ash that was used in this assessment did not produce ambient air levels of significance. The above conclusion was reached based on a comparison of the ambient air lead levels predicted in this study with those predicted at other ash monofills in Minnesota. The lead levels predicted around the proposed Pope-Douglas landfill were considerably less than those evaluated and found not to be of concern in the other studies.

The lead level estimated for the landfill leachate was also sufficiently low so as to eliminate it as a chemical of concern in the surface and ground water risk assessment. This conclusion was reached by a comparison of this level and those concentrations modeled for ground water and various surface waters with the MDH drinking water criterion (RAL) for lead.

5. COMMENT: The last sentence on page 4-99 does not make any sense. (48)

RESPONSE: This comment is correct, and should have been written to read as follows: Numerous exposure pathways were initially considered and

four exposure pathways were selected as appropriate for quantitative analysis.

6. COMMENT: The length of time for a spill or leak to do serious damage is listed and in most cases it is beyond our expected lifespan. I think it is irresponsible to use time as a defense. (48)

RESPONSE: The purpose of the Risk Assessment calculation is to estimate the length of time required for contamination to produce an environmental or human health effect. The purpose of a risk assessment evaluation is not to defend a project, but to prepare a scientific estimate of the likely damage which could occur from the project.

7. COMMENT: In the event of a catastrophic failure, several additional chemicals could reach significant levels in ground water, including lead, nickel, selenium, methylene chloride and t-1 2-dichloroethene. (57)

RESPONSE: MPCA acknowledges this comment and the additional MDH suggested mitigation measures will be considered if the Solid Waste Board should pursue permitting activities.

8. COMMENT: Concerned about contamination of crop and pasture land. (60)

RESPONSE: While the Air Quality risk assessment addresses the potential impact of this facility upon human health and animal life, it did not address impacts upon plant life in the general area around the site. It was acknowledged in the study, however, that phytotoxic data is currently lacking for many of the constituents associated with this project. For those chemicals that were addressed, the conclusion of the study was that this facility has the potential to affect some plant life (specifically due to the incinerator ash constituents) if it is improperly managed, i.e. if the ash is left uncovered and is allowed to be eroded by wind and water and accumulate in nearby soils.

9. COMMENT: Concerned that infectious waste material will end up in the landfill. (69)

RESPONSE: The SWB does not accept infectious waste at any of their waste handling facilities. If any such unauthorized waste is delivered to the site, the SWB would have to remove it in accordance with provisions of a permit.

10. COMMENT: What is the most restrictive metal and its site life? (69)

RESPONSE: Arsenic is the element which would present the greatest risk to local residents. Metals do not degrade in the environment, but migrate indefinitely down concentration gradients.

11. COMMENT: Which toxic substance may be present that have not been tested? (69)

RESPONSE: The MPCA requires testing by the SWB of all substances which they believe may produce an environmental or human health impact.

12. COMMENT: Will Pope/Douglas have their own treatment plant? If so, who will calibrate the equipment, and will they do priority pollutant tests to ensure it is working properly. (69)

RESPONSE: The SWB has not proposed to construct their own treatment plant. The SWB would be permitted to construct and operate a treatment plant if they so chose. If they did construct and operate a plant, they would be required to perform all the MPCA mandated pollution control tests.

13. COMMENT: What are the newest EPA requirements regarding new substances that should be added to the requirements in the future. (69)

RESPONSE: Federal Subtitle D regulations, which go into effect in October 1993, are the newest EPA requirements.

**G. SOCIAL AND ECONOMIC**

1. COMMENT: Property values in the area may go down resulting in loss of money for the school district. Consideration should be given to compensating the surrounding property owners. (8, 48, 60, 62, T53/23, T63/3) (18, 22, 36, 39, T15/5, T61/24, T62/14)

RESPONSE: This issue of a solid waste management facility having a negative effect on surrounding property values was raised during the Mayo Foundation Medical Waste Incinerator EIS. An extensive literature search was conducted for the Mayo EIS in an effort to predict the effects that construction of the proposed facility in Rochester would have on property values in the vicinity. The conclusion reached was there is no clear pattern of impacts on property value due to the presence of a waste management facility and that it is extremely difficult to predict with any reliability the impact this facility would have on surrounding land values. This is also consistent with the findings in the Dakota County Incinerator EIS.

This issue is beyond the scope of the EIS, and is a decision that would need to be discussed at the local level.

2. COMMENT: Why weren't Grant county residents involved in the site selection process? (47, 70)

RESPONSE: The decision on who to involve in the site selection process was made by the Pope and Douglas Counties. Refer to Section 1.5 of the FEIS. Public records indicate Grant County residents were present at public meetings, visited the site with representatives of the SWB and provided testimony.

3. COMMENT: An indemnity program for local wells should be established. (60)

RESPONSE: The financial assurance fund that the SWB would be required to maintain as part of its operating permit would address the issue of wells that may be impacted by the landfill.

4. COMMENT: A neutral third party should be hired to study the potential problems associated with this project. (60)

RESPONSE: The MPCA is a neutral third party. The MPCA staff assisted by experienced and expert consulting contractors, has taken a critical look at the proposed project and identified areas that needed changes and made recommendations on what those changes should be. These recommendations can be found in Sections 4.1.7.6, 4.1.8.2, 4.3.5, 4.4.5, 4.5.2.7, 4.5.3.7 of the Draft EIS.

5. COMMENT: Concerned about the cost of the project including the cost of the EIS. (T12/15)

RESPONSE: Minnesota statutes require that proposers of projects (in this case the SWB) be responsible for paying the cost of Environmental Impact Statements. The Pope/Douglas SWB reimbursed the State of Minnesota for its costs.

6. COMMENT: A board should be established for future health claims against the proposed facility. (T25/13)

RESPONSE: The Minnesota Pollution Control Agency and the Minnesota Department of Health are state agencies assigned the responsibility of enforcing the Health and environmental requirements of a proposed facility. Minnesota statutes have not established some independent Board to specifically review health claims against solid waste facilities.

7. COMMENT: A person from Grant county should be made a member of the Pope/Douglas Solid Waste Management Board. (T26/24)

RESPONSE: This comment is made available to the SWB for their consideration. Minnesota statutes or solid waste regulations do not contain requirements for membership on Solid Waste Boards.

8. COMMENT: Doesn't some Federal law deal with compensating people for their losses? (T62/14, 15)

RESPONSE: Federal solid waste regulations do not address compensation for alleged economic losses due to waste handling facilities.

9. COMMENT: Concerned about the final elevation of the landfill and how it might have an adverse visual effect upon Hoffman and the surrounding area. (44, 47, 58, 62, 65, T15/12, T22/22, T38/19, T53/21)

RESPONSE: Appendix C presents an artist's rendering of how the landfill would appear. Mitigative measures to further reduce visual impact include vegetative screens and berming.

10. COMMENT: The height of the landfill should be lowered by 20 feet making it blend into the surrounding landscape better and allowing trees to work as an effective screen. (48, 72)

RESPONSE: The MPCA believes screening may be an effective mitigation effort. This comment will be considered by MPCA in the event that the Solid Waste Board should continue to pursue a permit for the site.

11. COMMENT: How will the landfill be screened? (T32/1 T38/6 T39/19 T44/11)

RESPONSE: Refer to Comment G-10. (pg. 3-57)

12. COMMENT: The fact that the draft EIS states that there may be employment opportunities for people in the area to pick up litter is an admission that the screening will not be effective. (T47/11)

RESPONSE: The primary reason for screening is visual (i.e., to obstruct view of something which may be considered unattractive). Screening can provide some litter control through use of low hedges and bushes to catch blowing debris, however, good management practice suggests that litter picking should be implemented for all waste handling facilities.

13. COMMENT: For the record Pope/Douglas Solid Waste Management does not agree with RCM, Inc. on their financial assurance costs calculations. (3)

RESPONSE: The Pope-Douglas Solid Waste Board will be required to prepare a new Financial Assurance cost calculation and document questionable cost estimates with actual data.

14. COMMENT: Will sufficient financial assurance be provided to allow for the maintenance and monitoring of the ground water dewatering system and leachate collection system and any corrective action that might be necessary for the extended period following landfill closure? (47, 68, T14/17, T51/15, T52/8)

RESPONSE: A Financial Assurance Plan would be designed to provide funds for monitoring and maintenance according to the Solid Waste Rules.

15. COMMENT: Will sufficient financial assurance be provided to allow for treatment of leachate and ground water for the extended period required following landfill closure? (47, T51/15)

RESPONSE: See COMMENT No. G-14. (pg. 3-58)

16. COMMENT: Will funds be available through the Financial Assurance Fund to ensure that the impacts to Grant County and the City of Hoffman are maintained at the lowest level possible over an extended period of time? (47, 66, T24/15)

RESPONSE: See COMMENT No. G-15. (pg. 58)

17. COMMENT: The financial assurance estimates should be based on the new ash rules and monitoring requirements. (58)

RESPONSE: The MPCA would require financial assurance plans comply with the latest regulations.

18. COMMENT: If the ground water becomes contaminated and water must be trucked in or piped in, the SWB should pay for all cost. (48, 66)

RESPONSE: This comment will be considered by the MPCA in preparing permit conditions in the event that this project should proceed to the permitting phase.

19. COMMENT: Does Financial Assurance have a bearing on permitting or not permitting? (T19/16)

RESPONSE: Prior to issuance of a permit, the MPCA will require the SWB to prepare and obtain approval of a financial assurance plan.

20. COMMENT: Will the county carry insurance on this facility or will they be self insured? (T25/10)

RESPONSE: The Solid Waste Board stated they will ensure the facility through the Minnesota Counties Insurance trust.

#### H. ALTERNATIVES

1. COMMENT: Not all the alternatives have been looked at by the Solid Waste Board. A contract could be negotiated so ash and the bypass material could continue to be hauled to their present locations. (17)

RESPONSE: This comment is noted and is made available to the Solid Waste Board for their consideration. The MPCA does not have authority to require the SWB to continue to haul to their present locations.

2. COMMENT: The site of the Landfill should be as close to the source of the waste as possible which might mean having many smaller sites each close to an area generating waste. (40, T54/11)

RESPONSE: This comment is noted and submitted to the SWB for their consideration. Refer to Section 1.5 of the FEIS.

3. COMMENT: MPCA should include a full accounting within the final EIS of the eight site selection criteria as they pertain to site number 12, the site chosen for the locating the landfill. Does the proposed ash disposal landfill site meet the 200 foot set back requirement. (43, T49/2, T59/19)

RESPONSE: Section 2 of Technical Work Paper 9 - entitled "Alternative Disposal Methods and Sites" contains a detailed discussion of site selection activities by the County and Solid Waste Board. The MPCA's responsibility on landfill siting is limited to an evaluation whether the proposed site complies with the Solid Waste Rules. The proposed landfill does meet the 200 foot setback requirement.

4. COMMENT: The County used a number of voluntary siting criteria. What is the difference between voluntary guideline and a mandated legal requirement. (T22/14)

RESPONSE: Mandated requirements are legally binding requirements listed in the State Solid Waste rules and have been established through a public rule making process. Voluntary guidelines are county or SWB established criteria which are not legally enforceable.

5. COMMENT: An alternative site should be selected, one not located on the County line, 20 miles from the incinerator. (7, 8, 17, 36, 38, 39, 40, 44, 45, 47, 48, 49, 54, 58, 59, 60, 61, 62, 64, 65, 66, 67, 68, 69, 70, 72, T54/13)

RESPONSE: This comment is noted and made available to the SWB for their consideration. See Section 1.5 of this FEIS.

6. COMMENT: Supports the landfill and believes that the selected site is appropriate (4, 5, 6, 9, 10, 11, 12, 13, 14, 15, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 35, 37, 41, 42, 46, 50, 51, 52, 53, 56, 63, 71)

RESPONSE: This comment is noted.

I. MISC.

1. COMMENT: Would like to have the comment period extended. (T13/2)

RESPONSE: Comment period was extended.

2. COMMENT: The Siting Process: The most prevalent comment made about this proposed landfill was that the counties did not consider the wishes to the local residents in selecting the site. (T10/5,20, T23/13, T54/17)

RESPONSE: Landfill siting is a difficult public policy issue that has received much attention during the environmental review of this proposed facility. It is understandable that the proposed solid waste management facility would attract concern and opposition from people living in the vicinity of the proposed site. Through the Minnesota Waste Management Act and the continued involvement of the Legislative Commission on Waste Management, this difficult public policy question has been addressed, and the following direction has been provided to state and county governments with respect to their roles in solid waste facility siting.

The MPCA is responsible for establishing the criteria for design and operation of landfills through a combination of rules and environmental permits. The state solid waste rules specify the basic design and locational criteria (i.e. setbacks from lakes, streams, etc.). The solid waste facility permit specifies the exact design and operational criteria that must be applied to the proposed facility to protect the surrounding environment. The permit is an enforceable contract containing specific design and operational requirements that must be complied with.

The MPCA's "siting" role is to first establish the general siting criteria in statewide solid waste rules, which was done in 1988, and second, once a site is selected, to review whether the proposed site complies with those criteria. The site search and selection is performed by the County. When selecting a site, the local unit of government must

assure that the site meets all the federal, state, and local laws and rules pertaining to the type of facility that is being sited.

The site selection process used by the Pope/Douglas SWHB was looked at in great detail in the EIS and can be found in Section 2.0 of the DEIS.

3. COMMENT: Is it true that over the next five to eight years incinerators will cease to function in Minnesota? (T55/12)

RESPONSE: No.

4. COMMENT: Will the Citizen Board members have an opportunity to visit the site? (T58/25)

RESPONSE: The Citizen Board sets their own agenda. A request may be made for the Board to do so.

5. COMMENT: What as the MPCA 800 number? (T59/25, T60/22)

RESPONSE: The number has recently been changed to 1-800-657-3864.

6. COMMENT: When the MPCA staff takes this matter before the Citizens Board in September, will this be the only thing on the agenda? (T61/9)

RESPONSE: No, The Board will have a full agenda and this will be just one of many items that will be discussed.

#### 4.0 CLARIFICATIONS AND CHANGES TO THE DRAFT EIS

This section provides clarification and corrections noted by MPCA staff, or pointed out to MPCA staff during the public comment period on the Draft EIS.

#### 4.1 DRAFT EIS CHANGES

1. Page 2-7, Section 2.2: The DEIS concludes "In summary, it appears that of the sites offered for sale, the Solem township site was the most environmentally and locationally desirable site for a landfill". This is the conclusion of the SWB regarding this site, not that of the MPCA. The scoping document required the MPCA to identify the reason the SWB chose to pursue this particular site.
2. Pages 4-99 and 4-100, Section 4.5.2.1.1: The last sentence was incomplete and did not make sense. The underlined words were inadvertently left out of the sentence, which should have read, "Numerous exposure pathways were initially considered and four exposure pathways were selected as appropriate for quantitative analysis".

#### 4.2 PRAIRIE SURVEY

The site of the proposed landfill is described by the Minnesota Department of Natural Resources as a remnant till prairie. A prairie survey was performed as part of the Environmental Impact Statement to search for rare or endangered species. The study began with a field survey of the site to identify the least degraded prairie remnants for sampling. Six areas were selected for sampling. These areas, totalling about six acres, contained the best quality of remnant prairie on the project site. Their approximate sizes from A to F are 2.4, 0.5, 1.2, 0.4, 0.6 and 0.6 acres.

The species found in each plot in the top 50% coverage for each area are:

- A: Stiff goldenrod, yellow sweet clover, canada goldenrod, Kentucky bluegrass;
- B: Little bluestem, porcupine grass, smooth brome, side oats grama, pussytoes, northern bedstraw, quack grass;
- C: Kentucky bluegrass, dandelion, prairie willow;
- D: Porcupine grass;
- E: Yellow sweet clover, fringed safe, rose, side oats grama;

F: Wolfberry, fringed sage, smooth brom, purple prairie clover, side oats grama, and green needle grass

The project site was specifically searched for several rare plant species identified by the Department of Natural Resources as potentially existing on the site. The species listed, and their state status were:

Low milk vetch (Astragalus lotiflorus), undetermined status;  
Prairie moonwort (Botrychium campestre), proposed threatened;  
Hill's thistle (Cirsium hilli), special concern; and  
Small white lady's slipper (Cypripedium candidum), special concern.

A butterfly survey was conducted to identify the species on the site and, in particular, to search for the Poweshiek Skipper (Oarisma poweshiek), a state special concern species. Also, a species that could potentially occur on the site is the upland sandpiper (Bartramia longicauda), a State special concern bird species. Special efforts were made to search for signs of this species.

None of the potentially occurring rare plant or bird species were located on the site. However, the butterfly survey resulted in the identification of 26 butterfly species, including a pair of the Poweshiek Skipper located on one of the northern slopes.

#### Mitigative Measures

Approximately 4.1 acres of remnant prairie would be lost to the landfill. A possible option to compensate for the prairie lost may be to re-establish prairie grasses on the landfill cover. The tallgrass species, such as big bluestem and indiangrass, have extensive root systems penetrating up to six feet deep. Minnesota Pollution Control Agency regulations do not allow root penetration of the clay cap on a landfill and these species could not survive on the two foot top soil depth. However, some of the shortgrass species such as side oats grama, prairie dropseed and blue grama have shorter root systems and should have sufficient soil depth to become established. While prairie grasses alone do not constitute a prairie, they can establish the preliminary stage. With native forbs nearby to serve as seed stock, the forb composition may be able to re-establish itself, but weedy and aggressive species are also abundant on the adjacent area and measures may need to be taken to prevent their spread onto reclaimed areas.

While concern has been expressed that native grasses would not grow well on landfills because of methane emissions, the landfill would be sealed with 24 inches of compacted clay and it will have a methane collection system. Prairie grasses also generally require periodic burning or mowing to maintain vigor. Burning may not be feasible because of methane emissions. Mowing, while less desirable than burning since it does not reduce the litter build-up or return nutrients to the soil, would be an alternative option.

Prairie restoration can be a difficult process especially in this case where little is known about establishment on a landfill. Another option, with more likelihood of success be to preserve another already good quality prairie in the vicinity of the landfill project. An unnamed prairie remnant near Glenwood, has good prairie species, including the rare Hill's thistle, but it is not a protected prairie. Efforts could be focused on improving one of these sites.

The prairie remnant existing on the northern slope is proposed to be preserved. It would also need to be managed. Two forces are necessary to maintain a prairie, one which reduces the grass, allowing for more forb development, and one which reduces the litter build-up. Historically, these forces were provided by grazing bison and prairie fires. While cattle could be used to replace bison, their grazing habits are much different and more destructive than bison unless they are carefully managed.

#### 4.3 ECOLOGICAL RISK

##### 4.3.1 Surface Water

This summary modifies the Ecological Risk discussion contained in the Draft EIS. The anticipated levels of the chemicals that could be discharged to local wetlands showed risk results somewhat different from those presented in the human health study. A catastrophic release of leachate from the leachate holding tank could have a major ecological impact upon the wetland ecology. A slow continuous release of leachate to the till groundwater and subsequently to the wetland would be of "possible concern" as defined by the EPA. However, for either release to occur an improbable chain of events would have to occur simultaneously.

A catastrophic release would have to occur either during leachate removal activities or as a deliberate act of environmental terrorism. The following designed safeguards would have to fail concurrently for a catastrophic release to occur.

- 1) A security fence around the leachate storage/loadout facility would have to be breached;
- 2) The "spill return" piping from the loadout slab would have to malfunction;
- 3) The surface drainage ditches and dikes have to fail to allow the water to access the wetland rather than be directed to the spill prevention retention basin;
- 4) The outlet pipe from the spill retention basin would have to be left open.

A slow continuous release of leachate would require an equally excessive number of malfunctions.

- 1) The primary synthetic liner and leachate collection system would have to fail.
- 2) The secondary synthetic liner and leachate collection would have to fail.
- 3) The three foot thick clay barrier would have to fail.
- 4) The groundwater collection system would have to fail.
- 5) The environmental monitoring system would have to fail to detect the presence of leachate in the groundwater.

The slow continuous release would then reach the wetland in approximately 4600 years.

Thus, as long as even a portion of the safeguards remain functional, leachate would not be released to the environment under normal operations. While the potential exists, it seems reasonable to conclude that the facility would not likely create a significant negative impact upon the local biota.

#### 4.3.2 Air Quality Risk Assessment Revisions

This addendum provides background on some recalculations conducted as a follow-up to the Draft EIS, when MPCA reviewers determined that one inappropriate data set was used in the original risk assessment technical work papers. The recalculations did not result in any changes in conclusions or estimates of risk as presented in the Draft EIS; those remain unchanged.

In the course of the development of the Draft Environmental Impact Statement (EIS) on the proposed MSW Ash/Bypass Waste Landfill in Douglas County, Minnesota, two risk assessment technical work papers (TWP) were prepared - - TWP 7: Air Quality Ecological and Human Health Risk Assessment, and TWP 8: Surface and Ground Water Ecological and Human Health Risk Assessment. Both of these studies investigated the potential for the proposed facility to adversely impact public health and the environment. During the review phase of the Draft EIS, it was discovered that the incinerator ash composition dataset used in the Air Quality Risk Assessment contained data that were inappropriate for the study. The inappropriate data were leachate test (TCLP) results conducted on ash samples from the Alexandria, Minnesota incinerator. Since leachate would not be readily released to the air, it is believed that Ash Composition data is more appropriate for the air quality risk assessments.

The MPCA risk assessment consultant then recalculated the ash composition database after deleting the above mentioned leachate data and then reassessed the impacts of the proposed facility due to ash disposal at this site. The results of this re-evaluation are presented in the revised Tables 2a, 5a, 8a, 9a, 10a, 11a, 12a, 13a, 14a, 15a and 41a.

Table 2a: This table contains the revised ash composition database for this study after the leachate data have been removed. Some of the relevant changes to note are:

- ▶ the number of samples evaluated were only 18 (as opposed to the original listing of 38)
- ▶ the lowest concentration of nine elements increased (Al, Ba, Cd, Cr, Fe, Pb, Mn, Ni, Zn)
- ▶ the highest concentration of five elements decreased (Al, B, K, Se, Sr)
- ▶ eight of the 95% UCL values decreased (Al, B, Hg, K, Se, Ag, Sr, nc-PAHs), while nine values increased (As, Cd, Cr, Cu, Fe, Pb, Mn, Ni, Zn)
- ▶ four chemicals were dropped from the database due to non-detection (Ca, Mg, Na and pyrene)

Table 5a: This table contains the revised maximal incremental off-site annual average ambient air concentrations of the ash constituents. As these values are directly related to the ash composition data, as presented in Table 2a, similar changes to those summarized above for Table 2a occurred in this table also.

Table 8a: This table describes the database used to screen the proposed air emissions from this facility to determine the carcinogenic chemicals of concern for this project. The revised ash composition data lead to changes in three elements in this table: chromium (VI), cadmium, and nickel. As is noted, however, from their respective places in this table, these changes did not significantly impact this chemical selection process, nor did they lead to any changes in the resulting risks calculated for the human receptor. All three of these changes occurred in elements that were "screened out" of the assessment.

Table 9a: This table describes the database used to screen the proposed air emissions from this facility to determine the non-carcinogenic chemicals of concern for this project. The revised ash composition data lead to changes in 11 elements in this table: chromium, manganese, barium, cadmium, nickel, nc-PAHs, copper, selenium, zinc, boron and silver. As also noted from the location of each of these elements in this table, these revisions did not significantly impact this chemical selection process, nor did they lead to any changes in the resulting risks calculated for the human receptor.

Table 10a: This table describes the database used to screen the proposed air emissions from this facility to determine the chemicals of concern for aquatic life impacts. The revised ash composition data lead to changes in nine elements in the table: aluminum, copper, lead, cadmium, zinc, selenium, silver, chromium (VI) and nickel. As noted from the location of each of these elements in this table, these revisions did not significantly impact this chemical selection process, nor did they lead to any changes in the resulting risks calculated for this environmental receptor.

Table 11a: This table describes the database used to screen the proposed air emissions from this facility to determine the chemicals of concern for beef cattle impacts. The revised ash composition data lead to changes in 13 elements in the table: cadmium, aluminum, selenium, lead, copper, barium, iron, zinc, boron, nickel, manganese, strontium and chromium, and the disappearance of three elements from the evaluation: calcium, sodium and magnesium. As noted from the location of each of the above elements in this table, however, these revisions did not significantly impact this chemical selection process, nor

did they lead to any changes in the resulting risks calculated for this environmental receptor.

Table 12a: This table describes the database used to screen the proposed air emissions from this facility to determine the chemicals of concern for rabbit impacts. The revised ash composition data lead to changes in 13 elements in this table: aluminum, cadmium, selenium, iron, lead, barium, copper, zinc, boron, manganese, nickel, strontium and chromium. In addition, two elements were dropped from the evaluation: calcium and magnesium.

The revisions to the ash database did significantly impact this screening process. They also lead to changes in the quantitative impact analysis for this receptor. Based on the revised data, one chemical that was originally selected for evaluation with respect to this receptor, selenium, was dropped from the assessment. Four additional chemicals were selected for the quantitative study, iron, lead, barium and copper. Also, the dietary levels of all of these chemicals of concern changed. The impact of these changes in this database will be described with Table 41a.

Table 13a: This table describes the database used to screen the proposed air emissions from this facility to determine the chemicals of concern for earthworm impacts. The revised ash composition data lead to changes in five elements in this table: copper, zinc, lead, nickel and cadmium. As noted from the location of each of these elements in this table, none of these revisions had a significant impact on this chemical selection process. The ash composition revisions did change the projected soil concentrations of copper and zinc. Thus, the magnitude of the potential impacts to this receptor also changed. These impacts will be discussed with Table 41a.

Table 14a: This table describes the database used to screen the proposed air emissions from this facility to determine the chemicals of concern for terrestrial plant impacts. The revised ash composition data lead to changes in 10 elements in this table: copper, zinc, boron, selenium, cadmium, lead, manganese, silver, chromium and nickel. These revisions lead to the elimination of two of the original chemicals of concern for this receptor, selenium and boron, and changed the potential impacts of four chemicals of concern to this receptor: cadmium, copper, lead and zinc. These latter impacts will be discussed with Table 41a.

Table 15a: This table describes the database used to screen the proposed air emissions from this facility to determine the chemicals of concern for egret impacts. The revised ash composition data lead to changes in four elements in this table: cadmium, lead, copper and chromium. These revisions, however, did not significantly impact this chemical selection process, or the resulting risks calculated for this receptor.

Table 41a: This table describes in summary form the magnitudes of the potential impacts that this facility could induce in various ecological receptors chosen for this study from the long-term release of waste constituents into ambient air. The revised ash composition database had an impact on only three of these receptors: rabbits, terrestrial plants and earthworms.

Rabbits: The revised ash composition database lead to the elimination of one element in this study, selenium, and the inclusion of four additional elements: iron, lead, barium and copper. In addition, the predicted environmental media levels (in alfalfa) of all of these chemicals of concern changed. These revisions however, actually lead to a decrease in the overall ecotoxicity ratio for this receptor; from 1.0 E-01 to 5.5 E-02. This decrease was primarily due to a decrease in the impact attributable to aluminum. This decrease in the ecotoxicity ratio dropped this receptor from the list of species potentially impacted by this facility.

Terrestrial Plants: The revised ash composition database lead to the elimination of two elements in this study, selenium and boron, and changes (increases) in the environmental media levels (soil concentrations) of cadmium, copper, lead and zinc. These revisions resulted in an increase in the total ecotoxicity ratio for this receptor, from 8.0 E-01 to 9.3 E-01. This increase, however, is not of sufficient magnitude to result in a different conclusion concerning the potential impacts of this facility on this receptor.

Earthworms: The revised ash composition database lead to increases in the environmental media levels (soil concentrations) of two chemicals of concern in this study: copper and zinc. These changes also lead to an increase in the total ecotoxicity ratio for this receptor at both receptor locations. The total ecotoxicity ratio at Site A increased from 2.3 E-01 to 3.3 E-01, while the ratio at Site B increased from 3.2 E-01 to 3.6 E-01. Neither of these increases, however, were of sufficient magnitude to result in a different conclusion in regards to the potential of this facility to impact this species.

Table 2a: Summary of Chemical Composition Data of Incinerator Ash: Pope-Douglas MSW Incinerator

<u>Chemical</u>	<u>Frequency of Detection<sup>a</sup></u>	<u>Lowest Concentration (ppm)</u>	<u>Highest Concentration (ppm)</u>	<u>Statistically Derived Concentration<sup>b</sup></u>	
				<u>Mean (ppm)</u>	<u>95% UCL (ppm)</u>
Aluminum	18/18	9200	29,000	17,672	20,794
Antimony	17/18	1	13	6	8
Arsenic	14/18	7.7	37.0	13.5	18.0
Barium	18/18	150	770	284	359
Boron	18/18	34	210	79	102
Cadmium	18/18	13	34	21	24
Chromium	18/18	18	81	36	45
Cobalt	18/18	2.3	12.0	4.4	5.5
Copper	18/18	140	9100	1805	3024
Iron	18/18	6100	27,000	12,072	15,093
Lead	18/18	300	1900	652	878
Lithium	18/18	3.2	10.0	6.3	7.3
Manganese	18/18	240	1600	536	686
Mercury	18/18	0.24	0.94	0.49	0.59
Molybdenum	18/18	4.2	26.0	8.5	11.4
Nickel	18/18	11	59	25	32
Potassium	18/18	3000	8000	5611	6445
Selenium	5/18	5	12	7	11
Silver	15/18	0.1	0.6	0.3	0.4
Strontium	18/18	64	170	103	120
Tin	18/18	25	210	51	72
Titanium	18/18	160	740	357	430
Zinc	18/18	1300	6800	2456	3131
Cyanide	17/18	0.9	26	6.6	11.8
Pentachlorophenol	1/3	160	160	160	160
PCDD/PCDF (I-TEF) <sup>c</sup>	6/6	0.001782	0.006626	0.003940	0.006103

Table 2a (cont.)

<u>Chemical</u>	<u>Frequency of Detection</u>	<u>Lowest Concentration (ppm)</u>	<u>Highest Concentration (ppm)</u>	<u>Statistically Derived Concentration<sup>b</sup></u>	
				<u>Average (ppm)</u>	<u>95% CL (ppm)</u>
Non-carcinogenic PAHs					
Benzo(g,h,i)perylene	2/3	60	110	85	403
Carcinogenic PAHs					
Benzo(a)anthracene	1/3	77	77	77	77
Benzo(a)pyrene	1/3	61	61	61	61
Benzo(b)fluoranthene	2/3	53	94	74	334
Chrysene	2/3	41	170	106	925
Dibenzo(a,h)anthracene	2/3	40	97	69	431
Indeno(1,2,3-c,d) pyrene	1/3	<u>94</u>	<u>94</u>	<u>94</u>	<u>94</u>
Total		366	593	481	1922

<sup>a</sup> Number of samples in which a chemical was positively detected/total number of samples in which the chemical was analyzed.

<sup>b</sup> All data rounded off to the same number of significant figures as the reported data. UCL = upper confidence level of the mean.

<sup>c</sup> Fly ash data only. Total Polychlorinated dibenzo-p-dioxins (PCDD) and polychlorinated dibenzofurans (PCDF) are expressed in International Toxicity Equivalency Factor Units (EPA, 1989).

Table 5a: Predicted Maximal Incremental Off-Site Annual Average Ambient Air Concentrations of Pope-Douglas Incinerator Ash Constituents

<u>Chemical</u>	<u>Maximum Off-Site Ambient Air Concentration<sup>a</sup>(mg/m<sup>3</sup>)</u>
<b>A. Organics</b>	
Pentachlorophenol	3.2 E-10
nc-PAHs	2.2 E-10
c-PAHs	1.2 E-09
PCDD/PCDF (I-TEF) <sup>b,c</sup>	1.2 E-16
<b>B. Inorganics</b>	
Aluminum	4.2 E-08
Antimony	1.6 E-11
Arsenic	3.6 E-11
Barium	7.2 E-10
Boron	2.0 E-10
Cadmium	4.8 E-11
Chromium	9.0 E-11
Cobalt	1.1 E-11
Copper	6.0 E-09
Iron	3.1 E-08
Lead	1.7 E-09
Lithium	1.5 E-11
Manganese	1.4 E-09
Mercury	1.2 E-12
Molybdenum	2.3 E-11
Nickel	6.4 E-11
Potassium	1.3 E-08
Selenium	2.3 E-11
Silver	8.0 E-13
Strontium	2.4 E-10
Tin	1.4 E-10
Titanium	8.6 E-10
Zinc	6.2 E-09
Cyanide	2.4 E-11

<sup>a</sup> Modeled at 0.002 ug/m<sup>3</sup> total PM<sub>10</sub> isopleth. Chemical-specific ambient air concentrations calculated as in Appendix F.

<sup>b</sup> 1% fly ash assumed to be present in composite ash. Personal communication from Ms. Carol Andrews, MPCA Division of Solid Waste.

<sup>c</sup> International Toxicity Equivalency Factors (U.S. EPA, 1989).

Table 8a: Chemical Screening Database for Humans -- Carcinogenic Chemicals

<u>Chemical</u>	<u>Projected Off-Site Ambient Air Concentration (C<sub>ij</sub>)<sup>a</sup> (mg/m<sup>3</sup>)</u>	<u>Toxicity Factor(T<sub>ij</sub>)<sup>b</sup></u>	<u>Relative Risk Factor (x10<sup>5</sup>) (R<sub>ij</sub>)<sup>f</sup></u>
1,2-Dichloroethane	3.0 E-04	0.091	2.7300
1,1,2,2-Tetrachloroethane	4.0 E-05	0.20	0.8000
Vinyl chloride	2.6 E-05	0.29	0.7540
1,1-Dichloroethene	3.8 E-05	0.18	0.6840
- - - -			
Carbon tetrachloride	1.1 E-05	0.05	0.0550
Benzene	1.5 E-05	0.029	0.0435
Methylene chloride	2.0 E-04	0.0016	0.0320
Trichloroethene	5.3 E-05	0.006	0.0318
Chloromethane	3.4 E-05	0.0063	0.0214
Chloroform	2.1 E-06	0.081	0.0170
c-PAHs	1.2 E-09	122 <sup>c</sup>	0.0146
Tetrachloroethene	6.8 E-05	0.0018	0.0122
PCDD/PCDF	1.2 E-16	156,000,000 <sup>d</sup>	0.0022
Chromium (VI)	9.0 E-11	42	0.0004
Arsenic	3.6 E-11	15	0.0002
Cadmium	4.8 E-11	6.3	0.0000
Nickel	6.4 E-11	0.84	0.0000
Pentachlorophenol	3.2 E-10	0.12 <sup>e</sup>	0.0000
Total (R <sub>j</sub> ) <sup>g</sup>			5.1983

<sup>a</sup> From Tables 3 and 5

<sup>b</sup> From Table 7

<sup>c</sup> modifying factor of 20 included in toxicity value

<sup>d</sup> modifying factor of 1000 included in toxicity value

<sup>e</sup> oral TF value

<sup>f</sup>  $R_{ij} = C_{ij} \times T_{ij}$

<sup>g</sup>  $R_j = \sum R_{ij}$

Table 9a: Chemical Screening Database for Humans -- Non-carcinogenic Chemicals

Chemical	Projected Off-Site Ambient Air Concentration (C <sub>ij</sub> ) <sup>a</sup> (mg/m <sup>3</sup> )	Toxicity Factor (T <sub>ij</sub> ) <sup>b</sup>	Relative Risk Factor (x10 <sup>5</sup> ) (R <sub>ij</sub> ) <sup>g</sup>
c-1,2-Dichloroethene	2.2 E-04	100 <sup>c</sup>	2200.000
2-Butanone (MEK)	4.2 E-04	20	840.000
Xylenes	3.2 E-04	11.1	355.200
Dichlorodifluoromethane	1.2 E-04	17	204.000
4-Methyl-2-pentanone (MIBK)	1.0 E-04	20	200.000
Acetone	1.9 E-04	10	190.000
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Ethyl benzene	2.2 E-04	3.3	72.600
Toluene	4.2 E-04	1.7	71.400
Carbon disulfide	1.8 E-06	333	59.940
Trichlorofluoromethane	1.6 E-04	3.3	52.800
Methylene chloride	2.0 E-04	1.1	22.000
1,1-Dichloroethane	2.4 E-05	7.1	17.040
Chromium (total)	9.0 E-11	1,666,667	15.000
1,1,1-Trichloroethane	9.4 E-06	3.3	3.102
Chlorobenzene	1.5 E-07	167	2.505
Manganese	1.4 E-09	10,000	1.400
Barium	7.2 E-10	7,142	0.514
Mercury	1.2 E-12	1,111,100 <sup>d</sup>	0.133
Cadmium	4.8 E-11	10,000 <sup>c,e</sup>	0.048
Nickel	6.4 E-11	5000 <sup>c,d</sup>	0.032
Copper	6.0 E-09	27 <sup>c</sup>	0.016
nc-PAHs	2.2 E-10	666 <sup>f</sup>	0.015
Antimony	1.6 E-11	2500 <sup>c</sup>	0.004
Arsenic	3.6 E-11	1000 <sup>c</sup>	0.004
Zinc	6.2 E-09	3.3 <sup>c</sup>	0.002
Molybdenum	2.3 E-11	250 <sup>c</sup>	0.001
Pentachlorophenol	3.2 E-10	33.3 <sup>c</sup>	0.001
Selenium	2.3 E-11	200 <sup>c</sup>	0.000
Boron	2.0 E-10	11 <sup>c</sup>	0.000
Silver	8.0 E-13	333 <sup>c</sup>	0.000
Cyanide	2.4 E-11	50 <sup>c</sup>	0.000
Tin	1.4 E-10	1.7 <sup>c</sup>	0.000
		Total (R <sub>j</sub> ) <sup>h</sup>	4308.057

a From Tables 3 and 5

b From Table 7

c oral TF

d modifying factor of 100 included in toxicity factor

e modifying factor of 5 included in toxicity factor

f modifying factor of 20 included in toxicity factor

g  $R_{ij} = C_{ij} \times T_{ij}$

h  $R_j = \sum R_{ij}$

Table 10a: Chemical Screening Database for Aquatic Species

Chemical	Projected Surface Water Concentration (C <sub>ij</sub> ) (ug/L)	Toxicity Factor (T <sub>ij</sub> ) <sup>a</sup> (ug/L) <sup>-1j</sup>	Relative Risk Factor <sup>b,c</sup> (R <sub>ij</sub> )
Ethyl benzene	1.8 E-05	14.7	26.50
Xylenes	3.3 E-05	6.0	19.80
Toluene	4.9 E-05	4.0	19.60
1,1,2,2-Tetrachloroethane	5.9 E-05	2.0	11.80
Tetrachloroethene	3.1 E-06	16.9	5.24
Trichloroethene	3.6 E-05	1.4	5.05
Methylene chloride	5.2 E-05	0.6	3.12
TCDD	2.5 E-16	7.14 E+10	1.79
Benzene	1.9 E-06	8.8	1.67
1,1,1-Trichloroethane	8.3 E-07	3.8	0.32
Chlorobenzene	3.1 E-08	100.0	0.31
Chloroform	3.4 E-07	4.5	0.15
Copper	1.3 E-08	102.0	0.13
Lead	3.6 E-09	312.5	0.12
Aluminum	8.9 E-08	11.5	0.11
1,2-Dichloroethane	5.3 E-06	0.1	0.05
Mercury	2.5 E-12	142,857.1	0.04
Pentachlorophenol	6.7 E-10	175.4	0.01
Cadmium	1.0 E-10	885.0	0.01
Zinc	1.3 E-08	9.4	0.01
Selenium	4.8 E-11	200.0	0.00
Silver	1.7 E-12	833.3	0.00
Chromium (VI)	1.8 E-10	92.6	0.00
Cyanide	5.0 E-11	192.3	0.00
Arsenic	7.5 E-11	14.3	0.00
Carbon tetrachloride	1.8 E-10	5.7	0.00
Nickel	1.3 E-10	11.4	0.00
		Total (R <sub>j</sub> ) <sup>d</sup>	95.82

a TF x 10<sup>3</sup>

b RRF x 10<sup>5</sup>

c R<sub>ij</sub> = C<sub>ij</sub> x T<sub>ij</sub>

d R<sub>j</sub> = Σ R<sub>ij</sub>

Table 11a: Chemical Screening Database for Beef Cattle

Chemical	Projected Media Concentration ( $C_{ij}$ ) <sup>a</sup>	Toxicity Factor ( $T_{ij}$ ) <sup>b</sup>	Relative Risk Factor <sup>c,d</sup> ( $R_{ij}$ )
Trichloroethene	5.3 E-05(A)	588	3120.00
Methylene chloride	2.0 E-04(A)	26	520.00
TCDD	6.6 E-13(D)	3.33 E+09	220.00
-----			
Toluene	4.2 E-04(A)	2	84.00
Cadmium	2.6 E-07(D)	2000	52.00
Copper	3.3 E-05(D)	10	33.00
Lead	9.4 E-06(D)	33	31.02
Aluminum	2.3 E-04(D)	1	23.34
Barium	4.1 E-06(D)	50	20.50
Iron	1.7 E-04(D)	1	17.00
Tetrachloroethene	6.8 E-05(A)	2	13.60
Zinc	3.5 E-05(D)	2	7.00
Chloroform	2.1 E-06(A)	26	5.46
Selenium	1.3 E-07(D)	500	6.50
Manganese	7.8 E-06(D)	1	0.78
Nickel	3.5 E-07(D)	20	0.70
Molybdenum	1.3 E-07(D)	50	0.65
Cobalt	6.1 E-08(D)	100	0.61
Arsenic	2.0 E-07(D)	20	0.40
Mercury	6.6 E-09(D)	500	0.33
Boron	1.1 E-06(D)	7	0.16
Strontium	1.3 E-06(D)	0.5	0.07
Chromium	5.0 E-07(D)	1	0.05
Carbon tetrachloride	7.7 E-09(A)	38	0.03
		Total ( $R_j$ ) <sup>e</sup>	4157.20

<sup>a</sup> A = Air, units in mg/m<sup>3</sup>; D = Diet, units in mg/kg  
<sup>b</sup> TF x 10<sup>3</sup>: A units in (mg/m<sup>3</sup>)<sup>-1</sup>, D units in (mg/kg)<sup>-1</sup>  
<sup>c</sup> RRF x 10<sup>5</sup>  
<sup>d</sup>  $R_{ij} = C_{ij} \times T_{ij}$   
<sup>e</sup>  $R_j = \sum R_{ij}$

Table 12a: Chemical Screening Database for Rabbits

<u>Chemical</u>	<u>Projected Dietary Concentration (C<sub>ij</sub>) (mg/kg)</u>	<u>Toxicity Factor (T<sub>ij</sub>)<sup>a</sup> (mg/kg)<sup>-1j</sup></u>	<u>Relative Risk Factor<sup>b,c</sup> (R<sub>ij</sub>)</u>
Aluminum	2.3 E-04	5	115.00
Cadmium	2.6 E-07	2000	52.00
Iron	1.7 E-04	2	34.00
Lead	9.4 E-06	33	31.02
Barium	4.1 E-06	50	20.50
Copper	3.3 E-05	5	16.50
Zinc	3.5 E-05	2	7.00
TCDD	6.6 E-13	1.0 E+08	6.60
Selenium	1.3 E-07	500	6.50
Manganese	7.8 E-06	2.5	1.95
Boron	1.1 E-06	7	0.77
Nickel	3.5 E-07	20	0.70
Cobalt	6.1 E-08	100	0.61
Arsenic	2.0 E-07	20	0.40
Mercury	6.6 E-09	500	0.33
Antimony	8.7 E-08	14	0.12
Strontium	1.3 E-06	0.5	0.07
Chromium	5.0 E-07	1	0.05
Molybdenum	1.3 E-07	2	0.03
		Total (R <sub>j</sub> ) <sup>d</sup>	294.15

- a TF x 10<sup>3</sup>
- b RRF x 10<sup>5</sup>
- c R<sub>ij</sub> = C<sub>ij</sub> x T<sub>ij</sub>
- d R<sub>j</sub> = Σ R<sub>ij</sub>

Table 13a: Chemical Screening Database for Earthworms

<u>Chemical</u>	<u>Projected Soil Concentration (C<sub>ij</sub>)</u> (mg/kg)	<u>Toxicity Factor (T<sub>ij</sub>)<sup>a</sup></u> (mg/kg) <sup>-1</sup>	<u>Relative Risk Factor<sup>b,c</sup></u> (R <sub>ij</sub> )
Copper	7.1 E-02	7.6	539.60
1,1,2,2-Tetrachloroethane	1.3 E-02	9.4	122.00
Zinc	7.4 E-02	1.5	111.00
Ethyl benzene	9.5 E-03	9.4	89.30
Trichloroethene	7.9 E-03	5.8	45.80
- - - -			
Lead	2.0 E-02	0.2	4.00
1,2-Dichloroethane	3.7 E-04	9.4	3.48
Pentachlorophenol	9.1 E-05	35.1	3.19
Benzene	3.0 E-04	9.4	2.82
1,1,1-Trichloroethane	2.0 E-04	9.4	1.88
Chlorobenzene	1.2 E-06	9.4	1.13
Nickel	7.6 E-04	1.3	0.99
Cadmium	6.7 E-04	1.0	0.67
Chloroform	4.3 E-05	5.8	0.25
Carbon tetrachloride	6.3 E-08	5.8	0.00
TCDD	6.8 E-10	200.0	0.00
Total (R <sub>j</sub> ) <sup>d</sup>			926.11

- a TF x 10<sup>3</sup>
- b RRF x 10<sup>5</sup>
- c R<sub>ij</sub> = C<sub>ij</sub> x T<sub>ij</sub>
- d R<sub>j</sub> = Σ R<sub>ij</sub>

Table 14a: Chemical Screening Database for Terrestrial Plants

<u>Chemical</u>	<u>Projected Soil Concentration (C<sub>ij</sub>)</u> (mg/kg)	<u>Toxicity Factor (T<sub>ij</sub>)<sup>a</sup></u> (mg/kg) <sup>-1j</sup>	<u>Relative Risk Factor<sup>b,c</sup></u> (R <sub>ij</sub> )
Copper	7.1 E-02	17	1207.00
Zinc	7.4 E-02	14	1036.00
Lead	2.0 E-02	10	200.00
Cadmium	5.7 E-04	333	189.81
Molybdenum	2.7 E-04	500	135.00
- - - -			
Manganese	1.3 E-01	1	130.00
Boron	2.3 E-03	40	92.00
Selenium	2.7 E-04	200	54.00
Mercury	1.4 E-05	3333	46.70
Antimony	1.9 E-04	200	38.00
Tin	1.7 E-03	20	34.00
Arsenic	4.2 E-04	67	28.10
Chromium	1.1 E-03	13	14.30
Nickel	7.6 E-04	10	7.60
Cobalt	1.3 E-04	40	5.20
Silver	9.8 E-06	500	0.49
Total (R <sub>j</sub> ) <sup>d</sup>			3218.20

- a TF x 10<sup>3</sup>
- b RRF x 10<sup>5</sup>
- c R<sub>ij</sub> = C<sub>ij</sub> x T<sub>ij</sub>
- d R<sub>j</sub> = Σ R<sub>ij</sub>

Table 15a: Chemical Screening Database for Egrets

<u>Chemical</u>	<u>Projected Fish Tissue Concentration (C<sub>ij</sub>) (mg/kg)</u>	<u>Toxicity Factor (T<sub>ij</sub>)<sup>a</sup> (mg/kg)<sup>-1</sup></u>	<u>Relative Risk Factor<sup>b,c</sup> (R<sub>ij</sub>)</u>
TCDD	8.4 E-11	1.0 E+08	840.00
Mercury	1.1 E-07	10,000	110.00
Cadmium	6.4 E-09	10,000	6.40
Copper	4.0 E-06	10	4.00
Lead	9.7 E-07	40	3.88
Chromium	2.1 E-08	1,000	2.10
Pentachlorophenol	3.1 E-07	22	0.68
		Total (R <sub>j</sub> ) <sup>d</sup>	968.06

- a TF x 10<sup>3</sup>
- b RRF x 10<sup>5</sup>
- c R<sub>ij</sub> = C<sub>ij</sub> x T<sub>ij</sub>
- d R<sub>j</sub> = Σ R<sub>ij</sub>

Table 41a: Ecological Risk Estimate Summary Table

Receptor Species	Chemical	Predicted Environmental Media Concentration		Benchmark Concentration	Chemical-Specific Ecotoxicity Ratio	Total Receptor Ecotoxicity Ratio
		Media	Concentration			
Aquatic Species (Chippewa River)	Ethyl benzene	Water	9.0E-06 ug/L	68 ug/L	1.3E-07	
	1,1,2,2-Tetrachloroethane	Water	3.1E-05 ug/L	512 ug/L	6.1E-08	
	Tetrachloroethene	Water	1.6E-06 ug/L	59 ug/L	2.7E-08	
	Toluene	Water	2.5E-05 ug/L	253 ug/L	9.9E-08	
	Trichloroethene	Water	1.8E-05 ug/L	699 ug/L	2.6E-08	
	Xylenes	Water	1.6E-05 ug/L	166 ug/L	9.6E-08	4.4E-07
Aquatic Species (Red Rock Lake)	Ethyl benzene	Water	2.7E-06 ug/L	68 ug/L	4.0E-08	
	1,1,2,2-Tetrachloroethane	Water	9.1E-06 ug/L	512 ug/L	1.8E-08	
	Tetrachloroethene	Water	4.8E-07 ug/L	59 ug/L	8.1E-09	
	Toluene	Water	7.4E-06 ug/L	253 ug/L	2.9E-08	
	Trichloroethene	Water	5.5E-06 ug/L	699 ug/L	7.9E-09	
	Xylenes	Water	5.0E-06 ug/L	166 ug/L	3.0E-08	1.3E-07
Aquatic Species (Wetland A)	Ethyl benzene	Water	4.6E-05 ug/L	68 ug/L	6.8E-07	
	1,1,2,2-Tetrachloroethane	Water	1.6E-04 ug/L	512 ug/L	3.1E-07	
	Tetrachloroethene	Water	8.0E-06 ug/L	59 ug/L	1.4E-07	
	Toluene	Water	1.2E-04 ug/L	253 ug/L	4.7E-07	
	Trichloroethene	Water	9.0E-05 ug/L	699 ug/L	1.3E-07	
	Xylenes	Water	8.2E-05 ug/L	166 ug/L	4.9E-07	2.2E-06

Table 41a: Ecological Risk Estimate Summary Table (Continued)

Receptor Species	Chemical	Predicted Environmental Media Concentration		Benchmark Concentration	Chemical-Specific Ecotoxicity Ratio	Total Receptor Ecotoxicity Ratio
		Media	Concentration			
Aquatic Species (Wetland B)	Ethyl benzene	Water	2.7E-05 ug/L	68 ug/L	4.0E-07	
	1,1,2,2-Tetrachloroethane	Water	9.1E-05 ug/L	512 ug/L	1.8E-07	
	Tetrachloroethene	Water	4.8E-06 ug/L	59 ug/L	8.1E-08	
	Toluene	Water	7.4E-05 ug/L	253 ug/L	2.9E-07	
	Trichloroethene	Water	5.5E-05 ug/L	699 ug/L	7.9E-08	
	Xylenes	Water	5.0E-05 ug/L	166 ug/L	3.0E-07	1.9E-06
Aquatic Species (Wetland C)	Ethyl benzene	Water	9.0E-06 ug/L	68 ug/L	1.3E-07	
	1,1,2,2-Tetrachloroethane	Water	3.1E-05 ug/L	512 ug/L	6.1E-08	
	Tetrachloroethene	Water	1.6E-06 ug/L	59 ug/L	2.7E-08	
	Toluene	Water	2.5E-05 ug/L	253 ug/L	9.9E-08	
	Trichloroethene	Water	1.8E-05 ug/L	699 ug/L	2.6E-08	
	Xylenes	Water	1.6E-05 ug/L	166 ug/L	9.6E-08	4.4E-07
Beef Cattle (Site A)	Methylene chloride	Air	8.6E-05 mg/m <sup>3</sup>	0.39 mg/m <sup>3</sup>	2.2E-04	
	Trichloroethene	Air	2.3E-05 mg/m <sup>3</sup>	0.017 mg/m <sup>3</sup>	1.4E-03	
	PCDD/PCDF	Soil Alfalfa	2.2E-14 mg/kg 2.2E-12 mg/kg	3.0E-07 mg/kg 3.0E-07 mg/kg	7.3E-08 7.3E-06	1.6E-03
Beef Cattle (Site B)	Methylene chloride	Air	2.0E-04 mg/m <sup>3</sup>	0.39 mg/m <sup>3</sup>	5.1E-04	
	Trichloroethene	Air	5.3E-05 mg/m <sup>3</sup>	0.017 mg/m <sup>3</sup>	3.1E-03	
	PCDD/PCDF	Soil Alfalfa	1.1E-14 mg/kg 1.1E-12 mg/kg	3.0E-07 mg/kg 3.0E-07 mg/kg	3.7E-08 3.7E-06	3.6E-03

Table 41a: Ecological Risk Estimate Summary Table (Continued)

Receptor Species	Chemical	Predicted Environmental Media Concentration		Benchmark Concentration	Chemical-Specific Ecotoxicity Ratio	Total Receptor Ecotoxicity Ratio
		Media	Concentration			
Rabbits	Iron	Alfalfa	1.7E-04 mg/kg	5 mg/kg	3.4E-05	5.5E-02
	Aluminum	Alfalfa	8.9E-02 mg/kg	2 mg/kg	4.5E-02	
	Cadmium	Alfalfa	5.1E-04 mg/kg	0.05 mg/kg	1.0E-02	
	Lead	Alfalfa	9.4E-06 mg/kg	0.3 mg/kg	3.1E-05	
	Barium	Alfalfa	4.0E-06 mg/kg	0.2 mg/kg	2.0E-05	
	Copper	Alfalfa	3.3E-05 mg/kg	2.0 mg/kg	1.7E-05	
Terrestrial Plants	Cadmium	Soil	1.9E-03 mg/kg	0.03 mg/kg	6.3E-02	9.3E-01
	Copper	Soil	2.4E-01 mg/kg	0.60 mg/kg	4.0E-01	
	Lead	Soil	6.5E-02 mg/kg	1.00 mg/kg	6.5E-02	
	Molybdenum	Soil	9.1E-04 mg/kg	0.02 mg/kg	4.6E-02	
	Zinc	Soil	2.5E-01 mg/kg	0.70 mg/kg	3.6E-01	
Earthworms (Site A)	Ethyl benzene	Soil	4.1E-03 mg/kg	0.11 mg/kg	3.7E-02	3.3E-01
	1,1,2,2-Tetrachloroethane	Soil	5.5E-03 mg/kg	0.11 mg/kg	5.0E-02	
	Trichloroethene	Soil	3.4E-03 mg/kg	0.17 mg/kg	2.0E-02	
	Copper	Soil	2.4E-01 mg/kg	1.30 mg/kg	1.8E-01	
	Zinc	Soil	2.5E-01 mg/kg	6.62 mg/kg	3.8E-02	
Earthworms (Site B)	Ethyl benzene	Soil	9.5E-03 mg/kg	0.11 mg/kg	8.6E-02	3.6E-01
	1,1,2,2-Tetrachloroethane	Soil	1.3E-02 mg/kg	0.11 mg/kg	1.2E-01	
	Trichloroethene	Soil	7.9E-03 mg/kg	0.17 mg/kg	4.6E-02	
	Copper	Soil	1.2E-01 mg/kg	1.30 mg/kg	9.2E-02	
	Zinc	Soil	1.3E-01 mg/kg	6.62 mg/kg	2.0E-02	
Egrets	Mercury	Fish	3.6E-13 mg/kg	5.0E-07 mg/kg	7.2E-10	3.5E-09
	PCDD/PCDF	Fish	2.8E-16 mg/kg	1.0E-07 mg/kg	2.8E-09	

**APPENDIX A**  
**COMMENT LETTERS**



# United States Department of the Interior

FISH AND WILDLIFE SERVICE

ROUTE 1, BOX 76  
FERGUS FALLS, MINNESOTA 56537



1

IN REPLY REFER TO:

218/739-2291

July 7, 1992

MN Pollution Control Agency  
Environmental Analysis Office  
520 Lafayette Road  
St. Paul, Minnesota 55155

**RECEIVED**

JUL 10 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

Attention: Kevin J. Kain, EIS Project Manager

Dear Mr. Kain:

Thank you for the opportunity to review the Environmental Impact Statement for the Pope - Douglas MSW Ash/Bypass Landfill. In Sections 1.8.4, 3.1.7, and 5.1.15 the EIS states that there are seventeen Waterfowl Production Areas within a five mile radius of the landfill site, with the nearest two located one mile away to the northeast and southeast.

The enclosed map shows our properties in the landfill area. We have recently acquired 200 acres in Section 31 of Urness Township, one mile north of the site. Also, the EIS does not mention that we have over 35 Easements for Waterfowl Management Rights within a five mile radius of the landfill. These Easements are perpetual, and prohibit the burning, draining, filling, and leveling of wetlands. They are privately owned, and the U.S. Fish and Wildlife Service has no jurisdiction on the upland areas, only on the wetlands.

In addition to the wetland easements, we also have one Conservation Easement in the landfill area. This Easement protects uplands and wetlands, and is perpetual. The property is privately owned, but the owner's use of it is extremely limited.

I have enclosed a brochure about our wetland easement program. If you need more information or have any questions, please contact me.

Sincerely,

Sue Bolander  
Wildlife Biologist

U.S. FISH AND WILDLIFE SERVICE  
Fergus Falls Wetland Management District

SUE BOLANDER  
Assistant Wetland Manager





STATE OF  
**MINNESOTA**  
DEPARTMENT OF NATURAL RESOURCES

500 LAFAYETTE ROAD • ST. PAUL, MINNESOTA • 55155-40—10

DNR INFORMATION  
(612) 296-6157

July 16, 1992

Kevin Kain, Senior Planner  
Minnesota Pollution Control Agency  
520 Lafayette Road  
St. Paul, MN 55155

**RECEIVED**

JUL 20 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

RE: Pope/Douglas Municipal Solid Waste Ash/Bypass Landfill  
Draft Environmental Impact Statement (DEIS)

Dear Mr. Kain:

The Department of Natural Resources has reviewed the DEIS for the Pope/Douglas Municipal Solid Waste Ash/Bypass Landfill project. We offer the following comments for your consideration.

Section 4.4 of the DEIS is a well documented discussion of the existing character of the site's prairie remnants, and includes suggestions for mitigating any project impacts. However, this information has not been adequately integrated into the rest of the document. For example, the executive summary states in section 1.7.1.3 that the site harbors "no rare or unusual biota," whereas section 4.4.3.2 states that the Poweshiek skipper, a state special concern butterfly, was found on the site. In another case, section 4.4.5 contains a very intelligent discussion of mitigation in the prairie segment, but section 1.10 of the executive summary lists no potential mitigation for the loss of prairie while offering mitigation for potential wetland impacts. The final document should be consistent in both the executive summary and the body of the document on these, and other, aspects of this investigation.

The site survey results documented in section 4.4.3 verify the initial judgement of the Natural Heritage Program about the character and significance of the the prairie on the site, although the presence of the special concern Poweshiek butterfly elevates the significance of this area from the DNR's perspective. We support preservation and management of the prairie areas used by this species, and this will require appropriate management to assure that the prairie persists on the site. We suggest that the County, perhaps in concert with the consultants who did the prairie survey, develop a management plan to preserve and enhance the prairie. If this is not possible, the mitigation alternatives proposed in section 4.4.5 should be considered to compensate for the impacts of the project on this special concern species.

Thank you for the opportunity to review this document. We look forward to receiving your record of decision and responses to our comments pursuant to

Kevin Kain  
July 16, 1992  
Page 2

Minnesota Rules part 4410.2600, subpart 10. Please contact Joe Stinchfield of my staff, at (612) 297-4313, if you have any questions regarding this letter.

Sincerely,



Thomas W. Balcom, Supervisor  
Natural Resources Planning and Review Section  
Office of Planning

c: Merlyn Wesloh  
Steve Colvin  
Tom Lutgen  
Bonita Eliason  
Norm Moody  
Lynn M. Lewis, USFWS  
Gregg Downing, EQB  
Dennis Nagle, Director Pope-Douglas Solid Waste Management Board

#900225-02  
ER3.POPEDOUG.DOC



3

305 8TH AVENUE WEST  
ALEXANDRIA, MN 56308  
OFFICE: 612-762-2381

**RECEIVED**

JUL 20 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

July 16, 1992

Kevin J. Kain  
Project Manager  
Environmental Analysis Office  
Minnesota Pollution Control Agency  
520 Lafayette Road  
St. Paul, MN 55-155-3898

Dear Mr. Kain:

Please accept the following as my first comments on the Draft E.I.S. for the Pope/Douglas Ash/Bypass Landfill.

Section 4.1.9 of the draft E.I.S. speaks about the Pope/Douglas plan to construct a permanent Household Hazardous Waste facility. I am proud to report that the facility is now 99% complete. The staff will be moving into the office in early August and the collection system will be on line in October of 1992.

Enclosed please find a photo of the facility.

Section 4.1.9.6 Incinerator Process

This section has some serious errors in it. It states that the Pope/Douglas Incinerator operates at 980° c. This is not true. Our air quality permit dictates that we operate at a minimum of 1,800° F. In order to make sure we are in compliance, the minimum operating temperature of our furnaces is 1,850° F. or 1,010° C. The maximum temperature that we allow is 2,250° F. or 1,232.2° C.

In addition, our combustion efficiency is excellent as evidenced by the very low concentrations of carbon monoxide. Our testing indicates that carbon monoxide concentrations are at 5 to 10 P.P.M.

The Draft also states that the residence time of our waste in the incinerator is one second. This is FALSE as the residence time in our furnaces is greater than 2 seconds. Our acceptance testing showed a gas residence time of 2.215 seconds.

Kevin J. Kain  
July 16, 1992  
Page Two

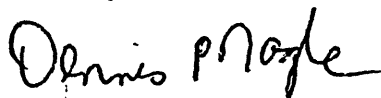
It appears that the author of this section on incineration may have been speaking in generalities, because his conclusions certainly do not apply to the Pope/Douglas facility.

These temperatures and residence times can be verified by studying the results of our 1987 performance tests that were submitted to the MPCA.

I also want to go on record as disagreeing with the financial assurance costs that were estimated by R.C.M.

I simply want to retain the right to negotiate these figures during the final design.

Sincerely,

A handwritten signature in cursive script that reads "Dennis P. Nagle".

Dennis P. Nagle, Director  
Pope/Douglas Solid Waste Management

DPN:dp

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4

JUL 20 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

7/16/92

MR KEVIN KAIN  
OFFICE OF ENV ANALYSIS  
MPCA  
520 LAVERGNE  
ST. PAUL, MN 55155

RE: APPROVAL OF THE  
SITE OF A LANDFILL IN  
SOLEH TOWNSHIP

SIR,  
PLEASE CONSIDER  
ACCEPTANCE OF THE  
PROPOSED SITE IN DOUGLAS  
COUNTY. I FEEL CONFIDENT  
THAT THIS SITE IS APP-  
ROPRIATE FOR DISPOSAL  
OF THE INCINERATOR  
ASH GENERATED FROM  
THE ALEXANDRIA PLANT  
AND THAT IT MEETS  
ALL OF THE CRITERIA  
FOR THE PROPER DIS-  
POSAL OF THE "LEFT OVERS"  
OF THIS SOCIETY.  
A GREAT DEAL OF  
TAXPAYER DOLLARS WOULD

Kevin Kain, Sr. Planner  
MPCA

520 Lafayette Road  
St Paul, MN 55155

**RECEIVED**

JUL 17 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

Dear Mr Kain:

As a taxpayer and resident  
of Douglas County I urge approval  
of the land fill site in Sec. 6,  
Salem Township.

Douglas County presently is without  
adequate land fill space and is  
presently hauling waste out of state  
which is very expensive.

I understand that this site  
meets all requirements as indicated  
by the Environmental Impact Statement.

Sincerely,

Harvey D. Telue

HARVEY D. TELUE

3808 Crestwood Drive

Glencendee, MN 56308

**RECEIVED**

JUL 20 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICEP O BOX 201  
STARBUCK MN 56381-0201  
July 17, 1992Mr. Kevin Kain  
EIS Project Manager  
MPCA Environmental Analysis Office  
520 Lafayette Road  
St Paul MN 55155

Dear Mr. Kain:

I have been following the progress, and the lack of progress, of the Pope-Douglas proposed landfill for the incinerator ash.

I have confidence that the studies, including the EIS are as accurate as can be expected for this purpose.

As a taxpayer I urge you to permit this landfill. I think alot of money has been spent on this effort to have our own landfill. Also, alot of money has been spent on hauling the ash out of state.

It seems that the people that manage and operate the incinerator and household hazardous waste and recycling program do a good job of housekeeping and grounds keeping. I have every reason to believe that they will be just as responsible with the landfill.

Sincerely,



Matthew Pederson

Hensington, Minn. 7  
July 18, 1992

RECEIVED

JUL 22 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

Kevin J. Zain,  
ES Project Manager,  
PCA Environmental Analysis  
Office,  
20 Lafayette Road,  
Paul, Minn. 55155

Again - the Pope-Douglas landfill  
is reared its ugly head.

The people of the Hoffman area hold  
fast to their community and want to  
keep it clean and safe - and then 2  
bigger towns get the idea to "kick  
around" a farming community and a  
small town to suit themselves, because  
they do not want a landfill in their  
area. Now, isn't it too bad to have  
committees from Pope-Douglas deciding  
here to place the landfill - La Grand  
ownership was eliminated because it was  
an urban expansion area for the  
city of "Alexandria" and adjacent to inter-  
state 94. I would like to know - why  
it you put a landfill in the hills  
Glenwood?

This landfill situation would be a  
unavoidable deal for the Hoffman community.

2

The whole community will suffer from it both mentally & physically as there is no assurance that it is a safe project.

Thank you,  
yours truly,

Mrs. Marnie Hegberg  
P. O. Box 195,  
Kensington, Minn.  
56343

Huffman, Minnesota.  
July 20, 1992.

8

RECEIVED

EIS Project Manager,

MPCA ENVIRONMENTAL ANALYSIS OFFICE  
520 Lafayette Road, St. Paul, Minnesota 55155

I have written before about the proposed landfill near my precious town of Huffman, Minnesota, & I'm still against it! It should be located near Alexandria or Glenwood! There must be some area near Alexandria where it could be built! How about the barren land adjacent to Highway 55 near the Highway 29? It doesn't make much sense to have "the fill" close to Huffman, when all the waste comes from Alexandria & Glenwood. Alexandria is getting more new stores and cafes, so they should take care of their own waste by their town. It is easier for Alexandria to push their waste near Huffman, as they only want tourists; camping; golf; resorts; marching bands; - everything special, nothing ugly! But then it is easier to push Huffman around; because we are smaller than Alexandria. Remember the population in Alexandria is 7,838. + Huffman is 576 !! We are trying to keep our town alive, and lean, and we do not need that kind of a problem to spoil things for us. We want to keep the Chippewa river clean just as much as Alexandria doesn't want their lakes polluted or contaminated! There has been a "sale" but who

Can say positively? It seems like the  
landfills that have been built, do not  
turn out so well, & people want them  
shut down.

We also know lands adjacent  
to this land fill, will loose their  
market value; but then Alex & Glenis  
won't worry about that. I have talked  
to alot of people, and no one can  
understand why somebody would sell  
lands for a land fill! Were the  
neighbors asked about it? I would  
never sell land for this purpose  
even if I received a huge amount of money.  
I lived on the farm (we owned it) where  
the "Staffanon Prairie" is located.

It is so special to so many! People  
came from far & wide to ride in a  
covered wagon to the prairie, when  
Huffman had their Centennial last year.

Now the new site in  
Solers Township has alot of precious  
<sup>prairie</sup> grass land and flowers, and it should  
be preserved also. Let's not destroy  
all land of prairie grass, flowers, &  
its fascination, with cement and  
man made monstrosities!! Will have to  
stop now, & not build & build and take  
out grass; trees; and everything precious  
that we had for years & years. God owns  
our land, & we have to be good  
stewards & <sup>take</sup> care; for it will soon disappear  
of the Huffman area! Put it where the

People who

1611 E. Lincoln Ave., Lot A7  
Alexandria, MN 56308  
July 21, 1992

**RECEIVED**

JUL 28 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

Mr. Kevin J. Kain  
EIS Project Manager  
MPCA Environmental Analysis office  
520 Lafayette Road  
St. Paul, MN 55155

Dear Mr. Kain:

As a former member and chairman of the Douglas County Planning Commission, I would like to express my thoughts in regards to the Pope-Douglas ash/bypass landfill in Douglas County.

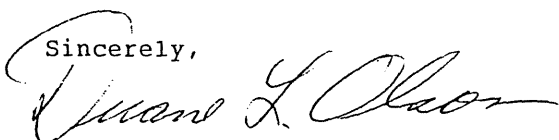
Having been actively involved in looking at all the proposed sites in Douglas County that were considered during the process of evaluation, I strongly feel that the volunteered site selection is no doubt the #1 location of all those that were considered. I very much understand the concern of the people in that locality as to why the ash/bypass landfill should be located in their area. It is unfortunate that a location of similar quality could not be found nearer to the Alexandria area; however, we all create waste and it is unfortunate that boundary lines have to be considered by county or state lines, as it is a problem that will have to be handled throughout the entire United States. I understand that there is concern regarding waste material blowing off the property, rodent control, water quality control, evaluation of adjoining property, etc.

I have read your Environmental Impact Statement and feel strongly that every consideration has been taken for the benefit of all involved and that the choice made by the Pope-Douglas Solid Waste Board recommending the Hoffman area site is no doubt the best possible choice that they could make at this time. There has been considerable money spent and thousands of hours put into this study and it is time that we move forward with the site. The concerns that have been expressed, I am sure, can be handled by good management and proper site work.

I recall the opposition to the Alexandria Lakes Area Sanitation District when that was proposed and how, after the completion, Douglas County now considers it one of their finest completed projects. In all sincerity, I hope that we can look back at this project and again consider it one of Douglas County's better environmental control projects well done.

I would like to express my appreciation to the Pope-Douglas Solid Waste Board and their manager, Dennis Nagle, for the years of effort that have gone into this project. Again, I urge you to accept this proposal on behalf of the Pope-Douglas citizens.

Sincerely,



Duane L. Olson

July 21, 1992

Kevin J. Kain  
EIS Project Manager  
MPCA Environmental Analysis Office  
520 Lafayette Road  
St Paul MN 55155

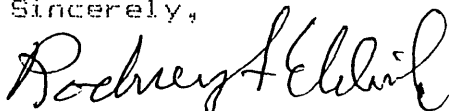
Dear Mr. Kain:

Thankyou for sending a copy of the draft EIS document on Pope-Douglas Solid Waste Board's proposed municipal solid waste incinerator ash/bypass landfill in section 6 of Solem Township, Douglas County Minnesota.

After reviewing the draft EIS that states this selected site is environmentally and locationally desirable for a landfill, I would request that the MPCA allow the Pope-Douglas Solid Waste Board to continue with this landfill project.

As a taxpayer in Douglas County and the State of Minnesota, I would also request that the final EIS and the required permits for this project be completed within a reasonable period of time.

Sincerely,



Rodney F. Eldevik  
1211 Maple Drive  
Alexandria, MN 56308

**RECEIVED**

JUL 24 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

July 22, 1992

Mr. Kevin Kain  
EIS Project Manager  
MPCA Environmental Analysis' Office  
520 Lafayette Road  
St Paul MN 55155

Dear Mr. Kain:

The Pope-Douglas joint powers board has an application for a permit to construct and operate a landfill. This landfill, operated in conjunction with the incenerator located in Alexandria, will make that operation complete and will save the mileage for hauling the ash to Wisconsin.

From the information I have read and heard, this incinerator ash is a safe, stable product. I also believe that the "new generation" landfills are going to be an environmentally safe disposal as opposed to the dumps of yesteryear.

I therefore recommend that you issue the permit to the Pope-Douglas joint powers board. Their management of the solid waste in these two counties indicates that they will be very responsible in managing a new landfill.

Sincerely,

*Wojciech A. Amundson*  
Box 144  
Starbuck, MN. 56381

EIS Project Manager  
MPCA Environmental Analysis Office  
520 Lafayette Road  
St. Paul, Mn. 55155

**RECEIVED**

JUL 24 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

12

Dear Mr. Kain:

I have followed the progress of the proposed Douglas Co. landfill near Hoffman, Mn. I read the study and report of the Alexandria newspaper printed July 1992. The proposal sounds environmentally safe and financially feasible. To haul the ash to Wisconsin will cost the residents of this area millions of dollars. The need to take care of this more locally and this appears to me to be a good site and a good solution.

I would recommend that you issue the permit to the Pope-Douglas joint powers board for the landfill. They will manage the project well.

Sincerely,  
Warren Osow

JUL 28 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICEKevin Weber  
Route 1, Box 164W  
Alexandria, MN 56308

July 23, 1992

Mr. Kevin Kain  
Senior Planner, M.P.C.A.  
520 LaFayette Road  
St. Paul, MN 55155

Re: Pope/Douglas Ash-Bypass Landfill

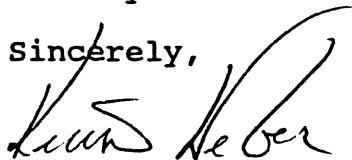
Dear Mr. Kain,

Please consider this letter supporting the proposed site for the Pope/Douglas Ash and Bypass Landfill Facility. As a resident of Douglas County, I fully believe we are responsible for disposing our solid waste in our own county versus trucking it out of state.

I have read the newspaper article from the Alexandria paper dated July 17, 1992 addressing the Environmental Impact Statement as well as the review of the summary of the Environmental Impact Statement. I feel this site has undergone extensive research at a large cost to the taxpayer and now it is time to make a decision. I feel confident that this site has proven to be environmentally safe and will be the state-of-the-art landfill.

Thank you.

Sincerely,



Kevin Weber

*The LeBrasseurs*  
521 West Lincoln  
Alexandria, Minnesota 56308

**RECEIVED**

JUL 27 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

July 24, 1992

Mr Kevin Kain, Senior Planner  
MPCA  
520 Lafayette Road  
St Paul MN 55155

Dear Mr Kain:

I would like to encourage approval of the landfill in Solem Township for Douglas County. We have made every effort to conform to standards of the Minnesota Pollution Control Board. We have gone to great expense reducing our waste by building an incinerator and recycling thus reducing our waste by 80%.

Since the environmental impact study says our site is safe I feel a permit should be issued. Starting the process over will involve repetition of years we have already invested in this process. We have gone through all the steps in good faith.

Sincerely,

  
Kathryn LeBrasseur

*Harvey D. Tewes*  
County Auditor

Office of  
County Auditor  
Douglas County

305 - 8th Avenue West  
Alexandria, Minnesota 56308-1793  
Tele. (612) 762-2381 Ext. 222

July 24, 1992

**RECEIVED**

JUL 27 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

Kevin J. Kain, Sr. Planner  
MPCA  
520 Lafayette Road  
St. Paul, MN 55155

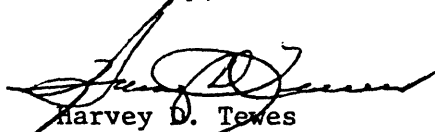
Dear Mr. Kain:

As Douglas County Auditor I support the approval of the Pope/  
Douglas solid waste landfill site in Section 6, Solem Township.

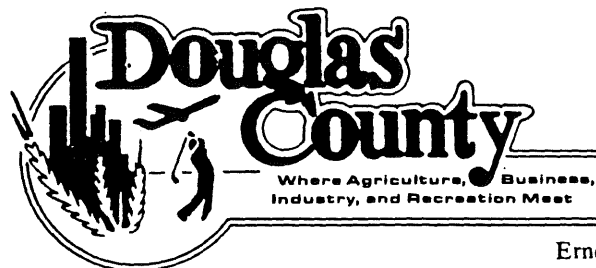
After completion of the most complex environmental study possible,  
the site has been proven to be a safe site.

To date the county has expended over \$600,000 and to not approve  
this site now would be a terrible waste of taxpayer dollars.

Sincerely,

  
Harvey D. Tewes  
County Auditor

HDT:ae



## DEPARTMENT OF HIGHWAYS

Ernest L. Olson, P.E.  
County Highway Engineer

P.O. Box 398  
Alexandria, Minnesota 56308  
612/763-6001

July 24, 1992

**RECEIVED**

JUL 27 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

Mr. Kevin J. Kain, EIS Project Manager  
MPCA Environmental Analysis Office  
Minnesota Pollution Control Agency  
520 Lafayette Road  
St. Paul, Minnesota 55155-3898

Re: Pope-Douglas Solid Waste Board  
Draft EIS on proposed solid waste landfill

Dear Mr. Kain:

This letter is written in response to the invitation to comment on the above referenced Draft EIS. These comments are regarding Section 5.1.12 Traffic and Section 5.1.13 Dust.

It is intended that the existing "Sandy Hill" Solem Township Road, which serves the area of the proposed landfill site, would be designated as a county road if this site receives formal approval. County road designation would be, as a minimum, from Trunk Highway No. 27 to the actual landfill site entrance. Improvements would be safety, dust control and structural strength for a 9 or 10 tons per axle all-weather landfill site access.

Designation of the existing township road as a county road, including corresponding upgrading and maintenance, is in keeping with Douglas County Board Policy to provide adequate and safe access to county facilities.

Thank you for the opportunity to comment on this proposed project.

Sincerely,

Ernest L. Olson, P.E.  
Douglas County Engineer/Public Works Director

ELO/kkl

cc: Douglas County Board of Commissioners  
Dennis Nagle, Director, Pope-Douglas Solid Waste

**RECEIVED**

JUL 06 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

June 27, 1992

Mr. Kevin J. Kain  
EIS Project Manager  
MPCA Environmental Analysis Office  
520 Lafayette Road  
St. Paul, MN 55155

Ref: Pope-Douglas Municipal Solid Waste Ash/Bypass Landfill

Sir:

After reading through the draft of the environmental impact statement pertaining to the stated landfill, it appears that the Board of County Commissioners of Douglas County and the Pope-Douglas Solid Waste Board have made their site selection in complete disregard to the social and economic impact on the City of Hoffman and the surrounding area

It appears that both of these Boards were able to pick and choose the criteria necessary for the development of an environmentally safe landfill which would put the site as far from the City of Alexandria and their property as possible. As stated in your draft, the Solem Township site met all of the siting criteria except one, and that was waived by the County. In another statement the Solid Waste Board did not use the site visibility and aesthetics as one of the criteria for the Solem Township site, but eliminated Site #2 because the land borders the interstate highway which conflicted with the site selection criteria.

The SWB selected the Solem Township site because it was the most environmentally and locationally feasible site. It appears that they are not concerned about the environmental part because they will continue to live far removed from the site and they apparently are not concerned about taxpayers' money as they will be trucking the largest share of the solid waste over 20 miles from the center of Alexandria.

On many of the statements pertaining to odor, groundwater run off, ash handling, litter, etc. the words, "would not expect to" or "it appears", were used. It appears that we will have to rely on your agency to insure the welfare of our small city and I would not expect you to make a decision strictly for the convenience of the SWB.

I think that you will find that the SWB has not pursued all of the alternatives or other site possibilities. On page 6-2 it is stated that it is not known whether or not the SWB could negotiate a contract extension to haul their waste to their present disposal site over a long-term. Has anybody asked? Or at this point is it easiest to pursue this proposed landfill considering the amount of effort that has gone into it by your agency and others.

We do not wish to look out the window of our devalued property and see a landfill on top of the hill overlooking our small town. There has got to be a better place somewhere in the area. I would hope that your agency has enough questions about the environmental impact, whether socially or economically, on this site and will deny a permit for its construction.

An interested party, .



Stanley Smith  
Box 61  
Hoffman, MN 56339

**RECEIVED**

JUL 28 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

July, 27, 1992

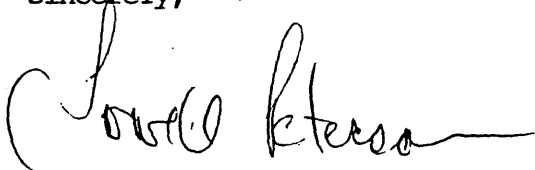
Mr. Kevin Kain  
Senior Planner, M.P.C.A.  
520 LaFayette Road  
St. Paul, MN 55155

Re: Pope/ Douglas Ash-Bypass Landfill

Dear Mr. Kain,

Pope/Douglas needs a landfill. After reading both the Environmental Impact Statement and the local paper on July 17, 1992, I realized we are in trouble. Of course no one wants in near them but your study points out on Page 6-2 that this site is acceptable. The study also seems to prove that the site is safe. It is time to permit this landfill.

Sincerely,



**RECEIVED**

JUL 28 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

July, 27, 1992

Mr. Kevin Kain  
Senior Planner, M.P.C.A.  
520 LaFayette Road  
St. Paul, MN 55155

Re: Pope/ Douglas Ash-Bypass Landfill

Dear Mr. Kain,

I can't understand why there is such a problem getting a new landfill for Pope and Douglas Counties. After reading a recent newspaper article telling the pros and cons, it was very plain to me the pros far out-weighed the cons.

Please know that many of us in the "Silent Majority" are in support of this new landfill.

Sincerely,



**RECEIVED**

JUL 28 1992

MP  
ANALYSIS OFFICE

July, 27, 1992

Mr. Kevin Kain  
Senior Planner, M.P.C.A.  
520 LaFayette Road  
St. Paul, MN 55155

Re: Pope/ Douglas Ash-Bypass Landfill

Dear Mr. Kain,

I am a tax paying resident of Douglas County. I recently learned that because of a small segment of the population (NIMBYS) the proposed landfill has cost many more dollars and a lot of time has been wasted.

After reading the newspaper articles regarding all the tests that were performed, I would like to come forward in support of the new landfill. It certainly sounds safe to me. We definitely need one as what will happen if Wisconsin no longer accepts our garbage?

Please put me down as a yes!

Sincerely,

*Richard J. Hardin*

**RECEIVED**

JUL 28 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

July, 27, 1992

Mr. Kevin Kain  
Senior Planner, M.P.C.A.  
520 LaFayette Road  
St. Paul, MN 55155

Re: Pope/ Douglas Ash-Bypass Landfill

Dear Mr. Kain,

How many years and dollars must be spent before we can get a landfill in Douglas County?

Our landfill closed down in 1991 and we do need a new one as to my knowledge no one has stopped producing garbage.

I am for a new landfill and hope we get one soon.

Sincerely,



**RECEIVED**

JUL 28 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

July, 27, 1992


Mr. Kevin Kain  
Senior Planner, M.P.C.A.  
520 LaFayette Road  
St. Paul, MN 55155

Re: Pope/ Douglas Ash-Bypass Landfill

Dear Mr. Kain,

We are a growing community and as a result the garbage increases. We do our best to control this by recycling, careful buying and incineration but we still need a landfill. Please approve this so we do not have to rely on other areas to be our dump.

Sincerely,



**RECEIVED**

JUL 28 1992

MPCA REGIONAL  
ANALYSIS OFFICE

July, 27, 1992

Mr. Kevin Kain  
Senior Planner, M.P.C.A.  
520 LaFayette Road  
St. Paul, MN 55155

Re: Pope/ Douglas Ash-Bypass Landfill

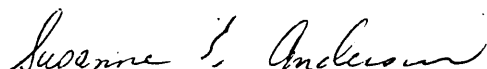
Dear Mr. Kain,

I am very much in favor of the proposed landfill in Douglas County. From what I know of the new ways the Sanitary Landfills are constructed (i.e. both clay and synthetic liners, plus leachate pipes and etc.) the contamination chances seem quite remote.

It's only a matter of time before states such as Wisconsin will stop accepting our wastes...then what do we do and at what cost?

Pleas allow this much needed landfill to be permitted A.S.A.P.

Sincerely,



**RECEIVED**

JUL 31 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

July 20, 1992

Kevin J. Kain, EIS Project Manager  
Environmental Analysis Office  
MPCA  
520 Lafayette Road  
St. Paul, MN. 55155

Mr. Kain,

I am in favor of the new landfill in Douglas County. We have needed one for years - the time to construct it is now!

Thank you for your consideration in this matter.

*Melba Shubert*

July 23, 1992

Kevin J. Kain  
EIS Project Manager  
Environmental Analysis Office  
MPCA  
520 Lafayette Road  
St. Paul, MN. 55155

**RECEIVED**

JUL 31 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

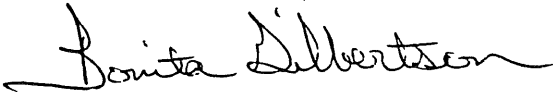
Mr. Kain,

My husband and I pay taxes on two lots in Douglas County. We recycle and try to be as environmentally friendly as we can. Garbage fees are now affordable, but what happens when rates escalate because we don't have a landfill?

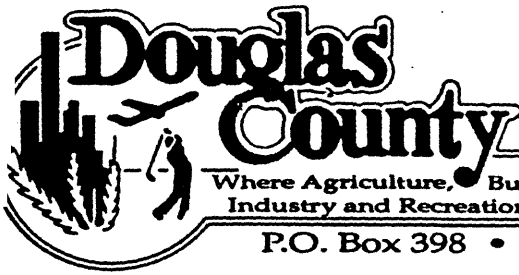
If the area selected meets the criteria (stated in local newspaper 7/17/92) it should be permitted as swiftly as possible.

I appreciate your attention to this matter.

Sincerely,



Bonita Gilbertson  
1307 Woodcrest Road  
Alexandria, MN. 56308



Where Agriculture, Business,  
Industry and Recreation Meet

DEPARTMENT OF PUBLIC WORKS

P.O. Box 398 • Alexandria, Minnesota 56308 • 612/763-6001

July 28, 1992

**RECEIVED**

JUL 31 1992

Kevin J. Kain  
EIS Project Manager  
MPCA Environmental Analysis Office  
520 LaFayette Road  
St. Paul, MN 55155

CA ENVIRONMENTAL  
ANALYSIS OFFICE

I have reviewed the EIS on the Pope-Douglas proposed land fill in section 6 of Solem Township.

It appears as though all conditions have been met to obtain final approval of this landfill site.

I personally have been involved with obtaining pertinent information on this site and am thoroughly convinced that this site is as environmentally safe as humanly possible.

I, as project water coordinator, for the Douglas County Comprehensive Water Plan, support this new proposed landfill site and would be concerned if this is not approved.

Again, I support this new site, as mentioned, and would appreciate any comments or concerns you might have regarding this issue.

Jerry Rathke  
Douglas County, Project Manager - Water Plan

Mr. Kevin Kain  
Environmental Analysis Office  
520 LAFayette Road  
St. Paul, Minnesota 55155

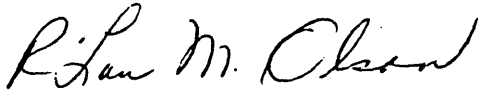
July 29, 1992

Dear Mr. Kain:

As a long time resident of Douglas County I would like to express my support for the landfill site near Hoffman, Minnesota. Since there is no scientific reason for not permitting usage of this site, it seems rational to use it as soon as possible.

I understand an in-depth study of this site has been completed and the report for the site is favorable. I understand that we are presently hauling the ash from our incinerator to Wisconsin and the other garbage to North Dakota. From what I have read, both states are expressing a negative attitude towards Minnesota "dumping its garbage" in their states. In view of the fact that we have a landfill within our county it seems wasteful to drive to those places when we could use our own. It won't be long before our garbage rates will increase again and this would be an unnecessary expense.

Sincerely,



R' Lou M. Olson  
1816 Fillmore  
Alexandria, Minnesota 56308

**RECEIVED**

JUL 31 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

28  
**RECEIVED**

To Whom It May Concern:

JUL 31 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

We are in support of the new  
landfill for Pope and Douglas  
Counties.

Please allow this much needed  
landfill to be operational as soon  
as possible.

Thank you for your consideration.

Sincerely,  
Ann Smidt  
James Smidt

**RECEIVED**

JUL 31 1992

JUL 31 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

1419 Irving St.  
Alexandria, MN 56308  
July 27, 1992

Mr. Kevin J. Kain  
EIS Project Manager  
MPCA Environmental Analysis Office  
520 Lafayette Road  
St. Paul, MN 55155

Dear Mr. Kain:

As a citizen of Douglas County, I strongly encourage you to approve the municipal solid waste incinerator ash/bypass landfill at Hoffman as per your impact study.

Sincerely,



Marilee G. Trosen

**RECEIVED**

JUL 29 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

July, 27, 1992

Mr. Kevin Kain  
Senior Planner, M.P.C.A.  
520 LaFayette Road  
St. Paul, MN 55155

Re: Pope/ Douglas Ash-Bypass Landfill

Dear Mr. Kain,

We as taxpayers have spent in excess of \$600,000.00 to prove that this is a safe site. This has now been proven as stated in the recent Environmental Impact Statement. We need a landfill as we are worried that other states won't take our waste on a long term basis. I support this project, please issue permit.

Sincerely,

*Karen Hardine*

→ SIM, can feeling  
Expressed as those  
at The Public mts.

- Location doesn't agree  
with.

- Leachate.

PO. 432

Hoffman, 56339

SF-00008-05

STATE OF MINNESOTA  
OFFICE INFORMATION MEMO

TO	Kevin	DATE	7/30	TIME	1:50
FROM	Karen Ness	LOCATION		LOCATION	31
PHONE NO.	(612) 986-2569	MESSAGE TAKEN BY	jmc		

<input checked="" type="checkbox"/> Colored	<input checked="" type="checkbox"/> Please call	<input type="checkbox"/> Was here to see you
<input type="checkbox"/> Urgent	<input type="checkbox"/> Will call again	<input type="checkbox"/> Returned your call

**ACTION**

<input type="checkbox"/> As we discussed	<input type="checkbox"/> For your information	<input type="checkbox"/> Per voice mail
<input type="checkbox"/> As you requested	<input type="checkbox"/> For your approval	<input type="checkbox"/> Take appropriate action
<input type="checkbox"/> Review and see me	<input type="checkbox"/> For signature	<input type="checkbox"/> Prepare reply for my sig.
<input type="checkbox"/> Review and return	<input type="checkbox"/> Notify staff	<input type="checkbox"/> Reply and send me copy
		<input type="checkbox"/> File <input type="checkbox"/> Dispose

**PHOTOCOPY**

<input type="checkbox"/> One side only	<input type="checkbox"/> Collate
<input type="checkbox"/> Head to head	<input type="checkbox"/> Staple
<input type="checkbox"/> Head to foot	<input type="checkbox"/> Other _____

**TYPING**

<input type="checkbox"/> Rough draft	<input type="checkbox"/> Final copy
<input type="checkbox"/> Single space	<input type="checkbox"/> Memo
<input type="checkbox"/> Double space	<input type="checkbox"/> Letterhead
<input type="checkbox"/> Rush	<input type="checkbox"/> Carbons

REMARKS/MESSAGES

Re: Pope-Douglas

PRINTED ON RECYCLED PAPER

July 24, 1992

**RECEIVED**

JUL 30 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

Kevin Kain  
Environmental Analysis Office  
Minnesota Pollution Control Agency  
520 Lafayette Road  
St. Paul, MN 55155

Dear Mr. Kain,

I am writing in regard to the application for a permit to build an Ash by-pass Landfill submitted by the Pope-Douglas Solid Waste Board.

I believe the Minnesota Pollution Control Agency should issue this permit for the following reasons:

- (1) The EIS conducted by the MPCA shows that the possibility of contamination by this landfill to be minimal.
- (2) The Pope-Douglas Solid Waste Board has followed MPCA regulations during the entire process of trying to obtain this permit. This process has been conducted over a period of several years.
- (3) The expense of this permitting process has been great and now with an EIS which shows minimal chance of pollution or negative environmental impact I believe the time is appropriate for issuing the permit.
- (4) As your office knows all projects such as this receives negative reaction from the persons in the vicinity of the project but I feel your study shows that the publicly expressed fears of pollution are unfounded and this landfill is a necessity to keep solid waste disposal in our area progressing in orderly fashion.

I served as Auditor in Douglas County until my retirement one year ago so am well aware of the effort and cooperation put forth by both the MPCA and the Pope-Douglas Solid Waste Board in regard to this project so am hoping the permit for the Ash by-pass landfill will be approved when the application is presented to your Board.

Very truly yours,



William J. Anderson  
616 - 10th Ave. E. P.O. Box #6  
Alexandria, MN 56308  
Phone No. 612-763-5847

7-22-92

33

**RECEIVED**

AUG 03 1992

Dear Mr. Kevin Kain:

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

Do we need a new landfill  
in Douglas County? YES!

Has the new landfill site  
been investigated and found to be  
environmentally safe? YES!

Do most of Douglas County  
residents want it? YES!

It seems to me that the  
only residents saying no are  
the NIMBYS, BANANAS and  
NOPEs. Please permit the  
landfill before more money is  
spent to hinder to just a  
few.

Sincerely,

Kristi Muzik  
Resident of Douglas  
County

RECEIVED

34

MPCA

AUG 03 1992

July 30, 1992

(Kevin Hain), MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

These questions were not asked at  
meeting at Hoffman,

Why was the original 39 acres sealed down  
to 20 acres?

Your draining down pushed water table to  
below landfill - How will this effect nearby  
wells? I believe your working with unknown.  
Will they be compensated.

E A statement says this is sand layers  
mixed in with clay - is this suitable  
for liners?

If monitoring wells detect Leachate,  
you say it can be pumped out, how and  
has this ever been done.

If Leachate is used to quench at incinerator  
will it result in Leachate becoming stronger  
and stronger?

How can you close a cell and leave others  
open 40 ft high? Why do you propose 40 ft  
high, I know for capacity, but not realistic?

Sincerely,  
Raymer Stock  
Hensington, Minn.  
56343

R.R. 5, <sup>EAST</sup> West Lake Carlos  
Alexandria, MN 56308  
July 31, 1992

Mr. Kevin Kain  
Senior Planner  
Minnesota Pollution Control Agency's  
Environmental Analysis Office  
520 Lafayette Road  
St. Paul, MN 55155

Dear Mr. Kain:


REFERENCE: Pope/Douglas Solid Waste Landfill Proposal

As a concerned citizen, let me begin by giving you a brief history as to my interests in the above referenced subject. I have been a resident of Douglas County for 59 years. I live on the east side of Lake Carlos. Approximately 1 1/2 miles, as the crow flies, from the existing Kløver landfill. I have over these numerous years been actively involved in the origination of Lakes Area Sanitary Sewage District as a town board supervisor and have spent 7 years on the planning and zoning board of the County and numerous other local endeavors. I am currently the general manager of Alexandria Light and Power which electrically serves the City of Alexandria and the majority of the lakes area.

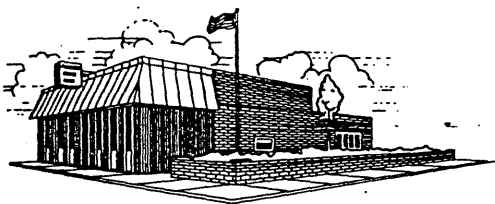
Over these years I have developed a sense of responsibility to my community. It is of great concern to me that the permitting process for the development of this facility is bogged down. Not by the technical issues but rather by a vocal few who are by-and-large ill-informed on the issues of solid waste management. It is my feeling as I read in the newspapers and other periodicals that the State of Minnesota Pollution Control Agency has been unable to deal with the responsibility of issuing the permits necessary to develop the landfills that are required to meet the needs of the residents of the state. The "not in my backyard" mentality seems to be the biggest hurdle in accomplishing your responsibilities.

This letter is not a request on my part to ask you to permit the site without having the proper engineering but rather to address the issues that seem to be politically motivated. In conclusion, I would request that you proceed with the permitting process and allow for this facility to be constructed.

Sincerely,

  
David Nelson

DN:v



# FARMERS STATE BANK

OF HOFFMAN

July 30, 1992

Kevin J. Kain, EIS Project Manager  
MPCA Environmental Analysis Office  
520 Lafayette Road  
St. Paul, MN 55155

RE: Pope-Douglas Municipal Solid Waste Ash/Bypass

Dear Mr. Kain:

Thank you for the very informative public meeting held July 21, 1992, at the Hoffman School.

If this project is permitted, consideration should be given to compensating the surrounding property owners for the loss of value to their properties and loss of tax revenue to the Hoffman and Kensington School Districts. The loss of valuation to the real property will be great. For example; I would expect that the Robert Johnson farm would be worth only a fraction of what he paid for it several years back. While the people living within the immediate area would suffer the largest economic impact, a loss of real estate value would be suffered by all the people in this community. This loss of real estate valuation should be reflected in reduced real estate taxes in the impacted area.

We understand that your agency is in a difficult position and that the residence of the greater Alexandria area have a serious landfill/garbage problem due to years of mismanagement and neglect. The economic cost of past mistakes should not be paid for by the people of the Hoffman Community.

Thank you for this opportunity to comment.

Your truly,

Verle R. Hammer  
President

VRH:dlk



# Alexandria Light and Power

37

316 FILLMORE STREET

P. O. BOX 609

ALEXANDRIA, MINNESOTA 56308

612-763-6501

---

July 30, 1992

Mr. Kevin Kain  
Senior Planner  
Minnesota Pollution Control Agency's  
Environmental Analysis Office  
520 Lafayette Road  
St. Paul, MN 55155

Dear Mr. Kain:

Re: Pope/Douglas Landfill Site

As a resident of LaGrande Township and Systems Engineer for Alexandria Light and Power I have watched with much interest the attempts to site a landfill for our area.

I am dismayed that this issue has not been resolved to date. The Pope-Douglas Solid Waste Board with the help of consultants have undergone an exhaustive sitting process and have determined a preferred site known as the Pope Douglas Proposed Landfill.

This site makes technical, environmental, and economic sense and I support their recommendation fully.

Please do your best to also convince those in power of the same.

Sincerely,

ALEXANDRIA LIGHT AND POWER

A handwritten signature in cursive script that reads "Allen Crowser".

Allen Crowser  
System Engineer

AC:vg

cc: Dave Nelson

38

Hoffman, Minn.

July 31, 1992

Kevin Kari, EIS Mgr.

St. Paul, Minn. 55155

**RECEIVED**

Dear Sir:

AUG 04 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

Our concern is that Hoffman area, in Grant Co. will be recipients of any & all unfavorable situations arising from the Douglas Co land fill site. We strongly urge that a site more central to Douglas Co. and Alexandria be chosen. It is highly unfair that Douglas and Pope Counties "dump" on the border of Grant County and the Chippewa River.

Please consider the above

Yours respectfully,  
Edna M. Olson  
Lemay H. Olson

8/4/92

39

Jim Rooney (check spelling)

23260 Wennersborg Road  
Kensington, Mn. 56343

- Concerned about Ground water pollution

- Concerned about air pollution

- Thinks property value will go down in area around the landfill and it will affect money for the school district

40

**RECEIVED**

AUG 05 1992

**MPCA ENVIRONMENTAL  
ANALYSIS OFFICE**

Hoffman, Mn. 56339  
August 1, 1992

Kevin J. Kain, EIS Project Manager  
Minnesota Pollution Control Agency  
Environmental Analysis Office  
520 Lafayette Road North  
St. Paul, Minnesota 55155

Gentlemen:

I have been a citizen of this community for more than 40 years and am retired. I was employed as General Manager for the Runestone Telephone Association for 32 years previous to retirement. I have reviewed most of the June 1992 Environmental Impact Statement and find it very disturbing.

Not being knowledgeable in the effects a storage site such as this can be on the many facets of nature, its water table etc. and the many other deterrents such a system can have on an area my comments are going to be general in nature.

It is my opinion that a site such as this should be located as near as possible to the center of an area of which it is going to provide service or storage of disposable material for. It should not be placed as close to a neighboring county line or city as possible and have them suffer for someones elses wastes which can and maybe very harmful to their community. I believe that it would be more practical to establish smaller sites within an area that will be located as stated above, somewhere near to the center of the area it serves, that way any pollution or harmful effects created will be created by the people in that community and they will be responsible for the cleanup, of their own pollution.

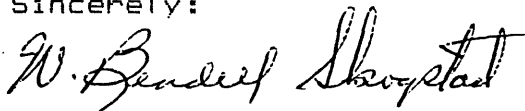
The selection of a site such as the one east of Hoffman is located on about as bad a place as possible for the pollution of water and streams or river. With the lay of the land in the area a good portion of the run of will go to the river and I know it is designed to prevent this, but I have very little faith in what it is supposed to do and what actually happens. I also believe that nobody, including engineers know actually where our aquifers lie, and it is very possible that one can become polluted then what and how long does it take to clear this up?.

Another problem I see with the selection of this site is the long distances trucks must travel over our already busy highways to bring the material to the site. There is no doubt in my mind that large heavily loaded trucks are harmful to our highways and the repair and maintenance of our highways is already extremely high. Also the traffic during all kinds of weather can be very dangerous and undesirable.

It is my belief that people cannot be forced to accept something such as this which has a possible chance of a health hazard and could even pollute the drinking water for a large area. The relocation of this site to the approximate center of the area it is to serve is almost a must and no other ash or garbage from other areas should be accepted.

Your comments will be appreciated. Thank You.

Sincerely:

A handwritten signature in cursive script that reads "W. Berdell Skogstad". The signature is written in dark ink and is positioned above the typed name.

W. Berdell Skogstad      A concerned Minnesota Citizen.

DONNA PEDERSEN  
ROUTE 7, BOX 654  
ALEXANDRIA, MINNESOTA 56308

**RECEIVED**

AUG 05 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

July 22, 1992

Kevin J. Kain  
EIS Project Manager  
Environmental Analysis Office  
Minnesota Pollution Control Agency  
520 Lafayette Road  
St. Paul, MN 55155

Dear Kevin:

I am writing in support of the incinerator ash and bypass landfill facility that has been proposed. I understand that the facility could be located on an 80-acre parcel in Solem Township, 20 miles west of Alexandria. I believe that this would be a safe place for the landfill to be located according to the article that I read in the July 17th Alexandria newspaper.

I believe that it's time that the Pope/Douglas County area has a landfill where the waste from this area can be disposed of properly rather than wasting money shipping ash and garbage out of this area.

Sincerely,



Donna Pedersen

dp/

8-1-92

**RECEIVED**

AUG 05 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

KEVIN KAIN

Senior Planner PCA

RE: Douglas County Proposed Landfill near Hoffman Mn.

I write in support of the proposed landfill near Hoffman Mn for a number of reasons.

First, there has been an EIS analysis of the site and it is favorable. Next, and not necessarily in order of importance, Douglas County has invested nearly three quarters of a million dollars of tax payers money to buy and obtain all the information needed. Next, we have an obligation to the community to dispose of our own waste rather than shipping to another state at great cost. Next, the landfill has to be somewhere and we have them in LaGrand township and Carlos township where we have taken their waste.

Everyone says "not here" but it has to go somewhere. In this area you cannot have a landfill or hardly anything else that a case could not be made for affecting one or more lakes. This our topography and we have to live with it. I am sure you would not be in favor of shipping our waste to St. Paul so let's get on with the approval and let us solve some other problems. I am President of Lobster Lake Association and on the Board of Directors of Douglas County Lakes Association and the views expressed are my own but in these associations we have problems to solve and they are not solved by passing the buck!

Yours truly,



R. W. Arthur

8802 NE LOBSTER DR.

Alexandria., Mn.




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**PROJECT ENVIRONMENT FOUNDATION**


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*Advocates For Minnesota's Environment*

**RECEIVED**

August 5, 1992

AUG 06 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

Kevin J. Kain  
EIS Project Manager  
MPCA Environmental Analysis Office  
520 Lafayette Road  
St. Paul, MN 55155

**RE: Draft EIS published for the proposed Pope-Douglas  
Municipal Solid Waste (MSW) Ash/Bypass Landfill facility in  
Douglas County, Minnesota**

Dear Kevin:

Project Environment Foundation (PEF) is a nonprofit organization which uses law, science and research to protect Minnesota's natural resources, wildlife and the health of its people. PEF's interest in the Pope-Douglas facility stems from our active participation in the MSW Ash Disposal rulemaking and our continued involvement in the MSW Combustor rulemaking procedures.

PEF's overriding concern with the Draft Environmental Impact Statement (DEIS) is the fact that this document fails to adequately address how the Pope-Douglas landfill facility will meet the requirements of the recently promulgated ash disposal rules. As written, the DEIS may look at the appropriate endpoints, however, it fails to provide the public with information as to what the actual ash landfill will look like once it has been designed to comply with the 1992 Minnesota MSW ash disposal rules. Therefore, the proposal for the ash/bypass landfill is inadequate as currently written.

**I. THE PROPOSED MSW ASH DISPOSAL/MSW BYPASS FACILITY  
DOES NOT MEET CURRENT REQUIREMENTS OF MN SOLID  
WASTE RULES 7001.0040-7035.2915.**

As required within the Minnesota MSW ash disposal rules, MSW bypass must be landfilled in a location separate from MSW incinerator ash. These separate areas or cells must have their own leachate collection systems in order to distinguish leachate coming from the bypass landfill from the leachate coming from the MSW incinerator

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*Economist*

Marybeth Suihkonen

*Office Manager*

ash landfill. This is important for tracking the source and subsequent remediation of problems should they occur. It is also necessary for assurance that the reduction of toxicity and quantity of ash is occurring in accordance with Minnesota law. (See Minn. Stat. §115A.97, Subd. 3.)

The new ash disposal rules for Minnesota require different types of liner systems based on the outcome of toxicity testing of the ash to be disposed of within the facility. The DEIS is unclear about the liner design required and how this correlates with the quarterly results of the ash testing from the Pope-Douglas incinerator. PEF points out that according to the new rules combined ash must be placed in a landfill appropriate for the most toxic fraction of that combined ash, namely, the fly ash. Landfill design must be based on the toxicity of the fly ash alone if combining fly and bottom ash.

An evaluation must be completed for the soils proposed for the cover and liner construction. (See Minn. R. 7001.3275, Subp. 3.) This soil evaluation should be included as part of the site evaluation within the final EIS. The DEIS simply states that the "soil characteristics would be suitable for a landfill". The public cannot evaluate the types of soil found on or near this site given such vague, non-specific information.

PEF appreciates the information provided on each of the 14 sites evaluated, however, we request that the MPCA include a full accounting within the final EIS of the eight site selection criteria as they pertain to site number 12, the site chosen for locating this landfill. Additionally, it was not clear from the diagram whether the 200 feet set back requirement for ash disposal landfills would be met by this proposed facility. (See Figure 3-2 at page 3-4.)

As currently written, the ash rules require efficiency ratings of the liner system in combination with the cover system for an overall site efficiency percent collection or rejection of the precipitation that falls on the disposal area. In order to determine the specific percent efficiency required, it is necessary to have full knowledge of the toxicity levels within the specific ash stream and as a result, the final design of the proposed ash landfill. This information must be included within the final EIS.

## **II. PEF HAS CONCERNS ABOUT THE PROXIMITY OF THIS LANDFILL TO THE PERCHED WATER TABLE AND THE CONTROL MEASURES PLANNED TO LOWER THE WATER TABLE BENEATH THE LANDFILL.**

Additional information should be included regarding the perched water table which intersects the landfill area. Specifically, PEF is concerned that control via a groundwater collection system to lower the water table beneath the landfill to prevent intrusion of groundwater into the landfill may not be an acceptable method of control. Has this type of control been utilized

before? Where? Have there been any problems associated with this type of control, including failures of the system?

On page 1-3 the DEIS states that water from the 25,000 gallon retention tank would be tested and if it meets state discharge standards, it would then be released. What are these standards? Because MSW is a mixture of components often including household hazardous waste which may include chemicals which are not required to be tested for, do these standards encompass all the testing necessary to demonstrate that this leachate will not prove harmful to the environment? Are separate leachate collection systems planned for the ash landfill and the MSW bypass landfill? The DEIS states that if this leachate contains contamination from the landfill, it would be removed from the site by tank truck for treatment. PEF believes that it is prudent to keep these leachate collection systems separate from one another so that the appropriate remediation procedures could be carried out should problems occur.

### **III. POSSIBLE DELETERIOUS ECOLOGICAL EFFECTS RESULTING FROM THIS LANDFILL HAVE NOT BEEN ADEQUATELY ADDRESSED.**

The DEIS is contradictory in regard to adverse ecological effects. On page 1-8 of the DEIS under *1.7.1.2 Ecological Risk*, it is stated that: "A catastrophic release of leachate from the leachate holding tank would have a major ecological impact upon the wetland ecology and a slow continuous release of leachate to the till groundwater and subsequently to the wetland would be of "possible concern" as defined by the EPA." Yet, in the third paragraph of the same section, it is stated that "it seems reasonable to conclude that failure of the safeguards at this facility would not likely create significant negative effects upon local biota." Please clarify these statements.

Additionally, more information is needed regarding background levels of contaminants already present at this site. Such information is necessary to adequately assess the ecological impacts on this area due to construction of this ash/MSW bypass facility.

### **IV. PEF IS CONCERNED ABOUT LOCATING THIS LANDFILL ON A SITE CONTAINING AND ADJACENT TO WETLANDS.**

The 1991 Wetlands Conservation Act (WCA) prohibits any drain or fill activity in a wetland unless it is exempt or the proposer has obtained local government approval of a replacement plan prior to initiating the drain or fill activity. The type and cross-section of a wetland may not be altered. Both Pope and Douglas counties have already lost more than 50 percent of their

presettlement wetlands; that being the case, any further loss must be carefully scrutinized and avoided. The proposed plan leaves too many questions unanswered concerning its impact on the wetlands on the site and those immediately adjacent. Inadequately described effects include constructing a drainage swale to eliminate ponding on the eastern portion of the site; the drainage discharge to the northwest into a wetland in Grant County; the effect of erosion and run-off from inadequate cover into adjacent wetlands.

Other questions include:

- Whether the proposer has followed the mitigation sequencing required by the 1991 Wetlands Conservation Act, i.e., avoid, minimize, rectify, and possibly, replace. Contrary to the assertion contained in the DEIS, the WCA does not establish a permitting program per se. The first question is whether the site can be re-configured to avoid taking any wetlands.
- Where would the wetlands be replaced? WCA's policy expects that lost wetlands will be replaced as close as possible to the original site.

Minnesota has suffered massive loss of its wetlands because project proposers have selected these areas to avoid controversy; the stated rationale for the site selected intimates that such thinking motivated this decision. The 1991 Act makes "no net loss" of wetlands the policy of this state. This plan appears to dismiss wetland concerns or does not honor the state policy.

#### **V. PEF SUPPORTS THE FOLLOWING MITIGATION MEASURES PROPOSED FOR THIS ASH LANDFILL/ MSW BYPASS SITE.**

PEF requests that MPCA seriously consider requiring installation of a burn-off (flare) for landfill gas to reduce ecological and human health air quality risk. Additional methods of control/utilization of this landfill gas should also be investigated and included within the final EIS. To address these issues, more information needs to be included in the final EIS regarding the amounts of landfill gas expected to be collected at the Pope-Douglas Landfill.

PEF highly recommends that a weigh scale be utilized at the landfill. The scale would provide valuable information in determining the waste volumes received at this site and would prove to be a useful record should the Pope-Douglas waste incinerator facility attempt to expand its operation.

PEF supports placement of a composite liner beneath MSW bypass cells to increase leachate collection efficiency and reduce potential groundwater contamination.

PEF supports ~~the~~ composting of lawn clippings and other non-toxic yard wastes pursuant to Minnesota law. (See Minn. Stat. §115A.931.) Regarding the composting of excess MSW, PEF reserves our comments on this issue until it is made clear what type of wastes will be composted and what type of composting facilities and operations will be utilized. The issue of composting does need further investigation, and additional information must be included in the final EIS.

PEF supports the submittal of a construction dewatering plan. This is particularly important as there are wetlands on site and in the vicinity of the proposed ash/MSW bypass landfill.

PEF supports the construction of a security fence around the leachate storage/loadout facility.

PEF supports providing landfill screening through construction of earthen berms and planting of trees to enhance aesthetics of the final site.

PEF supports serious consideration of upgrading and paving Sandy Hill township road which would decrease the levels of TSP. "A study recently published by the American Lung Association suggests that air pollution at levels considered safe under federal law may in fact not be safe. The study found that for every 100 microgram increase in total suspended particles per cubic meter of air, Philadelphia death rates rose by 10 percent among residents over age 65 and three percent in younger residents. Each 100 microgram jump in TSP brought a 19 percent increase in deaths from chronic obstructive pulmonary disease and an 11 percent rise in pneumonia deaths, along with a 15 percent increase in heart disease deaths. Death rates started to inch upward when particles reach levels as low as a third of the current federal standard for TSP". (See *Journal of the Air and Waste Management Association*, May 1992, Volume 41, No. 5, pgs. 708-709.) Because of this recent study, the possibility of paving this road must be seriously considered.

At this time PEF is unable to adequately assess the need for construction of an additional surface water retention basin and a separate groundwater retention basin at the Pope-Douglas Landfill. This is due to the incompleteness of information provided within this DEIS in addition to inconsistencies of the proposed landfill design with the design requirements found in the new ash disposal regulations.

PEF does **not** advocate the purchase of more land than the current site already has without further justification for taking this action.

Thank you for ~~the~~ opportunity to comment. PEF looks forward to working with you on this proposed facility plan, and anticipates arrival of the final EIS which should be written to comply with current Minnesota and federal laws and guidelines.

If there are further questions regarding these comments, do not hesitate to call me at 223-5969.

Sincerely,



Kathleen Norlien, MS  
Staff Scientist



Carol Wiessner  
Staff Attorney



Katherine McGill  
Staff Attorney

My concerns are:

- ① Some statements made in EIS are mis-  
leading —
- ② I'm afraid it will adversely affect appearance  
of the area — and  
will be an ugly eyesore from Hoffman.
- ③ mind born contaminants —
- ④ affect of tourism in Hoffman area.
- ⑤ Industrial & hazardous waste being put  
on top of our water table.

All these are important to me but of course the water is of uppermost importance! The need to live here! The need to be concerned about the future for ourselves — it's obvious the MPCA isn't — and the future water supply for our children & grand children! I believe Alex <sup>Glenn</sup> & Can find a dump site somewhere in all the areas around them & keep out of our front lawn!

Mae & Harry Youngberg

ON 11 22 2000 No. 1220



# Minnesota Pollution Control Agency

Celebrating our 25th anniversary and the 20th anniversary of the Clean Water Act

*over please.*

**RECEIVED**

July 30, 1992

AUG 06 1992

**MPCA ENVIRONMENTAL  
ANALYSIS OFFICE**

TO INTERESTED PARTIES

The end date of the public comment period for the Pope-Douglas Municipal Solid Waste Ash/Bypass Landfill Draft Environmental Impact Statement (EIS) has been changed from August 5, 1992, to August 12, 1992, an addition of one week. This is the second extension that has been granted to the public comment period.

Written comments on the project will be accepted until 4:30 on Wednesday, August 12, 1992, and should be directed to:

Kevin J. Kain, EIS Project Manager  
Minnesota Pollution Control Agency  
Environmental Analysis Office  
520 Lafayette Road North  
St. Paul, Minnesota 55155

Sincerely,

Paul Hoff, Director  
Environmental Analysis Office  
Administrative Services Division

PH:ns

Kevin Kain

I am writing to protest against  
the proposed land-filled site ~~in~~  
on the Grant-Douglas County line.  
I am also requesting a EIS Book.

**RECEIVED**

AUG 06 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

Thank you

Billie White

Po Box 117

Hoffman mn 56339

RR 1 Box 44A  
Garfield, MN 56332  
August 5, 1992

**RECEIVED**

AUG 07 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

Kevin J. Kain, EIS Project Manager  
Minnesota Pollution Control Agency  
Environmental Analysis Office  
520 Lafayette Road North  
St. Paul, MN 55155

Dear Mr. Kain:

The Pope County and Douglas County taxpayers, through their Pope-Douglas Solid Waste Board, are sincerely attempting to be responsible for disposal of their own (ash) waste. They have cooperated and complied with every request and regulation. The Environmental Assessment Worksheet and now the Environmental Impact Study have proved to meet every scrutiny of safety, and it is time to get on with the process.

The taxpayers on every side of this issue have overspent time, energy and dollars on a project that the EAW initially found to be environmentally safe. It is incomprehensible that the MPCA Citizen Board could arbitrarily deny the EAW and permit request when technically it met standard and was presented with the staff's recommendation for approval.

Probably a fiscal responsibility ought to accompany the Citizen Board's capricious decision of that sort.

Certainly, everyone is trying to do their job; but in the big picture, it far reaches any semblance of prudence for one more dollar to be spent on study of this project which exceeds the toughest of environmental standards.

Issue the permit.

Sincerely,

  
Ruth Goodwin-Nagle

August 10, 1992

Mr. Kevin J. Kain  
 EIS Project Manager  
 Environmental Analysis Office  
 Minnesota Pollution Control Agency  
 520 Lafayette Road  
 St. Paul, MN 55155

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AUG 11 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE**RECEIVED**

AUG 11 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

RE: Pope-Douglas Municipal Solid Waste Ash/Bypass Landfill  
 Draft Environmental Impact Statement (DEIS)

Dear Mr. Kain:

Peer Environmental & Engineering Resources, Inc. (PEER) was retained jointly by the City of Hoffman, Elk Lake Township, Land Township, Solem Township and Urness Township to assist them in reviewing the DEIS and developing written comments concerning the DEIS and the proposed landfill. PEER has reviewed the DEIS dated June, 1992 and the Environmental Assessment Worksheet (EAW). PEER has not reviewed other documents on which the DEIS and EAW are based. PEER has also met with representatives of the City of Hoffman, Elk Lake Township, and Land Township, and Mr. Roger Anderson (who owns property adjacent to the proposed landfill) to discuss their concerns and comments regarding the DEIS, EAW and the proposed landfill.

Based upon review of the documents and discussions with the above referenced parties, the following comments, observations, opinions and questions concerning the DEIS, the EAW and the proposed landfill project have been formulated. These comments have been reviewed by, and are being submitted on behalf of, the City of Hoffman, Elk Lake Township, Land Township, Solem Township and Urness Township.

#### SITING PROCESS AND DEIS CONCLUSION

##### *General Comments:*

On page 6-3, the DEIS concludes: "In summary, it appears that of the sites offered for sale, the Solem Township site was the most environmentally and locationally desirable site for a landfill." This conclusion can be best addressed by considering its components:

1. Environmental Desirability

The DEIS indicates that a number of potential landfill sites were considered in addition to the currently proposed site. Most of the potential sites were rejected because of a high water table. The proposed site also has a high water table. In fact, ground water dewatering will be required for the proposed landfill. Based upon the limited information provided in the DEIS and EAW, it appears that waste may be placed as much as 25 feet below the water table.

In addition, two wetlands occur on the proposed site and another wetland is immediately adjacent to the west of the proposed site (the "Grant County Wetland"). The Grant County Wetland will receive all runoff from the proposed landfill. The City of Hoffman municipal water supply well is located approximately 1 1/2 miles downgradient (down flow) of the proposed landfill.

2. Locational Desirability

The proposed site is highly visible, offers no natural screening and is exposed to wind. Potentially contaminated surface water and ground water emanating from the site will immediately discharge to Grant County. Grant County residents will not contribute to the waste stream at the landfill, but will be the recipients of any surface water or ground water contamination which results from the landfill.

*Questions:*

1. Why wasn't the proposed site also rejected because of high ground water?
2. Why wasn't the proposed site rejected due to the presence of wetlands?
3. Why wasn't the proposed site rejected due to visibility?
4. Why wasn't the proposed site rejected due to exposure to wind?
5. Why weren't Grant County residents involved in the site selection process since they will be most directly impacted by the proposed site?

## COUNTY CONDITIONAL USE PERMIT

As the DEIS points out, the public testimony concerning the proposed project and issuance of a conditional use permit by Douglas County differs significantly from the project as currently proposed in three areas:

- The site will not be screened as originally proposed.
- The waste will cover 20 acres rather than 5 acres as originally proposed. The DEIS suggests that a landfill expansion beyond the currently proposed 20 acres may be allowed in the future.
- The site will receive raw garbage in contrast to the original proposal.

In addition, under the current proposal, the site will also receive white goods and tires.

## THE DEIS AND EXISTING PLANS

It appears that the DEIS is based upon preliminary design, construction, operation, contingency, closure and post-closure plans. The DEIS indicates that a number of significant revisions to current plans are necessary or desirable; however, final plans have not been developed at this time. In order to accurately evaluate environmental impacts associated with the proposed landfill, the DEIS should be based upon final plans and not the currently available preliminary plans.

## ASH COMPOSITION

### *General Comments:*

Table 4-2 of the DEIS compares the values for ash constituents which are reported in the literature with the values which have been obtained from actual ash testing. In many cases, the maximum concentrations reported from ash testing are significantly lower than the maximum concentrations reported in the literature. In the case of lead, the ash testing results indicate that the combined ash has concentrations on the low end of the range reported for bottom ash. The ash testing results appear to indicate lead concentrations which are significantly lower than would be expected based upon the data reported in the literature. The DEIS reports that the laboratory data has been validated.

### *Questions:*

1. Why are the lead concentrations reported for the ash significantly lower than the concentrations reported in the literature?
2. Has the ash sampling protocol been validated to determine if the samples are representative of the ash being sampled?

3. Are the ash samples obtained at a frequency such that the ash being sampled is representative of the ash which will be disposed at the landfill?

## LEACHATE COMPOSITION AND LINER DESIGN

### *General Comments:*

The DEIS presents conflicting data regarding the expected concentrations of contaminants in the leachate. The following discussion focuses on lead; however, the discussion can be applied to other contaminants as well.

Table 4-3 indicates that the Projected Leachate Composition for lead is 0.40 mg/l. On page 4-7, the DEIS states "As is noted from Table 4-4, the required liner design is based on the anticipated leachate contaminant levels listed in Table 4-5." Table 4-5 indicates a lead concentration of 0.3 mg/l. Table 4-11 of DEIS indicates a leach potential for lead of 0.0026 - 0.17 mg/l for combined ash. Table 4-11 indicates a "Leachate Literature Value" for bottom ash of 0.15 - 0.6 mg/l.

Of these values, the one which appears to agree most closely with the literature value for leachate (Table 4-11) is that indicated in Table 4-3 (i.e., 0.40 mg/l). According to Table 4-4 of the DEIS, the projected leachate concentration for lead (0.40 mg/l) will exceed MLCL (Table 4-5) of 0.3 mg/l. Consequently, the more protective Design Requirement 2 (Table 4-4) should be applied to the site rather than the suggested Design Requirement 1.

The current leachate disposal plan calls for utilizing the leachate for Ash Quenching. In this scenario, contaminated leachate will be mixed with the ash and redeposited in the landfill. In essence, all leachate generated by the ash will be recycled through the landfill. Leachate recycling in this manner will tend to gradually increase the contaminant concentrations in the resulting landfill leachate.

### *Questions:*

1. What concentration of contaminants (and particularly lead) are anticipated to occur in the leachate? How much confidence does the Solid Waste Board and the MPCA have in the projected leachate concentrations?
2. Have the effects of leachate recycling been considered in developing the projected leachate concentrations? How will odors associated with the leachate be managed during ash quenching operations?
3. Why is the less protective Design Requirement 1 (Table 4-4) being applied instead of the more protective Design Requirement 2 when it appears that the leachate lead concentration will exceed the MLCL of 0.3 mg/l?

## GROUND WATER AND DEWATERING

### *General Comments:*

#### 1. Perched Ground Water

The DEIS indicates that the base of the landfill will occur below the till water table. The till water table is consistently referred to as the "till (perched) water table" throughout the DEIS.

On page 4-55 the DEIS states "In the northwest corner of the site, the ground water within the outwash materials occurs under confining conditions, with the piezometric head at an elevation above the top of the outwash sand/upper till contact. The base of the upper till unit occurs at a lower elevation in the northeast portion of the site. The till (perched) water table and outwash ground water unit merge in the northeast portion of the site. The two units are distinct aquifers with different hydraulic properties, however, there is no unsaturated zone between the till unit and the outwash unit in this portion of the site."

These statements indicate that the till water table is not "perched" under portions of the site.

The geologic cross sections in the EAW have been reviewed to further evaluate the extent of the till water table which is not perched. The cross section were difficult to evaluate due to their small scale and inconsistencies regarding their lettering and directional labeling (see for example; D'-D', E'-E'); therefore, some interpretation was required in the evaluation process. Based upon the evaluation, it appears that at least 1/2 of Cell 1 and approximately 1/4 of Cell 2 overlie an area where the till water table is not perched and is in direct hydraulic communication with the underlying outwash aquifer.

The extent of the till water table which is not perched may be significantly greater during climatic periods with normal or above normal precipitation. It is not clear from the DEIS or the EAW when subsurface water level measurements were obtained; however, based upon the dates of the reports referenced in the EAW, it appears water level measurements were obtained in the 1988-1990 time interval which included a two year drought period. Subsurface water levels may be significantly higher during non-drought periods.

## 2. Dewatering System

Starting on page 5, the EAW states: "The collection system is designed to lower the water table beneath the fill area to a level at which it will not come into contact with waste fill. The ground water flowing beneath the fill area will be under confining pressure due to the excavation of the fill area into the water table and the presence of the clay liner preventing upward flow. As this water flows out from beneath the liner, it will be seeking to return to a higher level consistent with the amount of confining pressure it was under. Therefore, a ground water collection system will be constructed to route the ground water to the surface detention pond and reduce the upward pressure."

On page 6, the EAW goes on to state "If for unforeseen reasons the ground water collection system does eventually fail, ground water would accumulate in the aggregate layer of the ground water collection system. If sufficient quantities of ground water accumulate, hydrostatic pressure could develop, and ground water would infiltrate into the overlying clay liner. If this ground water eventually reaches the leachate collection layer, it will be collected and disposed of as leachate. Hydrostatic pressure from infiltrating ground water is not likely to result in damage to the overlying liner due to the weight of overlying waste material (Reference 4)."

From these statements, it is apparent that waste will be placed below the water table. Neither the DEIS or the EAW states to what depth below the water table waste will be placed; however, a preliminary evaluation suggests that waste may be placed as much as 25 feet below the water table. Consequently, a 25 foot thickness of waste may become saturated when the dewatering system fails or if dewatering is discontinued. Based upon this information, it is apparent that dewatering must continue for an extended period of time (essentially, forever) following landfill closure.

When the EAW was prepared, the proposed landfill design did not include a flexible membrane liner. The DEIS proposes that a flexible membrane liner be utilized to mitigate a large number of potential environmental impacts; however, the use of a flexible membrane liner appears to be incompatible with a landfill which will be constructed below the water table. Flexible membrane liners are usually designed and installed to restrict the downward percolation of liquid (in this case leachate). In the event that the dewatering system fails or if dewatering is discontinued, ground water may migrate upward through the clay liner and exert an upward force on the base of the flexible membrane liner. The upward force may result in liner failure, particularly at the seams.

*Questions:*

1. How much of the proposed landfill site extends over a water table which is not perched? Did the evaluations presented in the DEIS consider that a portion of the proposed landfill overlies a water table which is not perched?
2. What water level data were used to evaluate the positions of the water tables? Have worst case conditions (i.e., periods of above normal precipitation) been considered in the evaluation?
3. What is the design life of the ground water dewatering system?
4. How long will the ground water dewatering system be operated?
5. How long will the leachate collection system be operated?
6. What criteria will be utilized to determine when ground water dewatering and leachate collection can be discontinued?
7. How much waste will become saturated when ground water dewatering is ceased or when the system fails?
8. Where will ground water and leachate be treated for the extended period required following landfill closure?
9. How will the ground water dewatering system and the leachate collection system be maintained for the extended period required following landfill closure?
10. Will sufficient financial assurance be provided to allow for the maintenance and monitoring of the ground water dewatering system and leachate collection system for the extended period following landfill closure?
11. Will sufficient financial assurance be provided to allow for treatment of leachate and ground water for the extended period required following landfill closure?
12. How will the upward seepage of ground water effect the integrity of the flexible membrane liner?
13. Have other landfills which place waste below the water table been permitted by the MPCA? What is the operational history of the associated dewatering and leachate collection systems? How do the environmental impacts associated with such landfills compare with those which place waste above the water table?

## **SURFACE WATER RUN-OFF**

It is unclear how surface water runoff from the site will be controlled. The DEIS contains conflicting statements:

- On Page 1-4, the DEIS states "A restricted outlet from this pond would limit the release of water from the site to pre-landfill conditions."
- On Page 3-22, the DEIS states "The surface runoff from the landfill is proposed to be routed to a retention pond and released at a rate that matches the pre-landfill conditions."
- On Page 4-12, the DEIS states "The retention pond is proposed to be a 'flow-through' pond with an open outlet pipe. Water would leave the pond at the rate it enters."
- On Page 4-51, the DEIS states "The storm drainage calculations for the landfill permit application were based on the ten (10 year) 24 hour storm event using a Type I rainfall distribution for only the 20 acre landfill area. While this rainfall event complies with the requirements of the solid waste rules, in this case to evaluate the impact upon the proposed landfill, it is appropriate to investigate a 100 year 24-hour rainfall using a Type II rainfall distribution over the 129 acre subwatershed."

The information available in the DEIS suggests the construction of the proposed landfill will increase the volume of run-off from the site. The run-off will be discharged to the Grant County Wetland and ultimately to the Chippewa River. Since the volume of run-off will increase, it does not appear feasible to "...limit the release of water from the site to pre-landfill conditions." It may be possible to limit the peak rate of discharge to pre-landfill conditions, but not the total volume of discharge. The environmental impacts to the Grant County Wetland and the Chippewa River associated with the increased run-off have not been evaluated.

## **RISK ASSESSMENT**

The risk assessment presented in the DEIS does not consider the impacts associated with an on-going release of leachate to the Grant County Wetland via surface discharge after facility closure. An on-going release is a distinct possibility if the dewatering system fails and the water table rises.

Lead is not included in the list of Chemicals of Concern in most of the impact evaluation scenarios. Table 4-2 indicates that lead concentrations are expected to be relatively high in the incinerator ash. Why wasn't lead considered in more of the impact evaluation scenarios?

## OTHER ISSUES

- The size of the landfill and the wastes which will be accepted have changed significantly since originally proposed. Are other changes anticipated if the site is permitted? Will the site accept wastes from other currently existing landfills?
- The current proposal calls for placing waste to an elevation of 1,354 feet which is approximately 70 feet higher than existing ground elevation. The final design elevation is significantly higher than surrounding topography and will result in a high degree of site visibility.
- The DEIS does not address the impact of the proposed landfill on nearby property values. The DEIS simply states "The question of whether landfills cause devaluation of adjacent properties is a subject of debate." It may be appropriate to complete a more detailed analysis of the impact of the proposed landfill on property values.
- It is unclear if the proposed Financial Assurance fund will be adequate to provide for management of the facility for an extended time period following post closure. Will funds be available to ensure that impacts to Grant County and the City of Hoffman are maintained at the lowest level possible over an extended period of time?

In summary, it appears that the DEIS for the proposed landfill has raised a number of significant issues which should be addressed to allow for an informed decision regarding the acceptability of the project.

Please contact me or any of the commenters listed below if you require clarification concerning this correspondence.

Respectfully Submitted,  
Peer Environmental & Engineering Resources, Inc.



L. Michael Johnson, P.E., CPG  
Executive Vice President

LMJ:ab

Attachment: Signature Page

pc: Mayor Dennis Satre, City of Hoffman  
Mr. Dennis Winter, Elk Lake Township  
Mr. Gordon Larson, Land Township

Mr. Ken Anderson, Solem Township  
Mr. Jerry Johnson, Urness Township  
Mr. Roger Anderson

## SIGNATURE PAGE

The comments, observations, opinions and questions presented in the attached letter were developed with the assistance of Peer Environmental & Engineering Resources, Inc., and are being submitted on behalf of the undersigned Commenters.

### ENGINEER'S CERTIFICATION

I hereby certify that this report was prepared by me or under my direct supervision and that I am a duly Registered Professional Engineer under the laws of the State of Minnesota.

L. Michael Johnson      August 10, 1992      16735  
L. Michael Johnson, P.E.      Date      Registration No.

### COMMENTERS

Dennis Satre Mayor  
Mayor Dennis Satre, City of Hoffman

Dennis Winter Elk Lake Township Supervisor  
Mr. Dennis Winter, Elk Lake Township

Gordon Larson Land Township  
Mr. Gordon Larson, Land Township

Ken Anderson  
Mr. Ken Anderson, Solem Township

Jerry Johnson  
Mr. Jerry Johnson, Urness Township

Box 181  
Hoffman, MN 56539  
August 3, 1992

Kevin Kain, EIS Project Manager  
Environmental Analysis Office, MPCA  
520 Lafayette Road North  
St. Paul, MN 55155

**RECEIVED**

AUG 11 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

Dear Sir:

I am writing in regard to the Pope-Douglas Solid Waste Board's proposed landfill in Solem Township. I own and live on property adjoining the landfill site to the north. I am opposed to the landfill for the general reasons that no one wants garbage dumped in his backyard--it's a dirty, smelly eyesore! As I read through the EIS draft, I made notes and have comments and suggestions about it.

1.3: I feel accurate and complete lab reports are necessary.

1.4: I think it is inappropriate to drain the landfill directly into the next county.

1.8.2: Winter operations will be difficult. Wind and snow will make the trash hard to control, and frozen ground will make covering it hard during extended periods of 20 below weather. I don't know how that will be accomplished. Does SWB have a plan for that?

1.8.3, 4.1.4.1, 5.1.16: The proposed height of the completed landfill is 40 feet above the highest land around it. Several people at the meeting on July 21 complained about this. I think the completed height should be reduced by 20 feet and rounded off to blend in with the surrounding hills. There would be several benefits from doing this. The first would be that less of the landfill would be visible and it wouldn't be as noticeable from farther away. Secondly, the landfill operations would be concealed from the south and partly to the east and west by the natural hills for most of the landfill's life. This would allow trees planted on those sides to grow for 20 to 25 years. They probably would be able to provide some screening of the closing operations by that time. Reducing the height should also reduce the effect of the wind. I think the fill area could be extended to the east to make up the lost amount. Looking at the gap in figure 4-2, it seems that the volume of the landfill lost in the top 20' as it narrows to a peak could be added to the east end by extending it slightly.

1.8.7, 5.2.3.5: The devaluation of the property next to the landfill site may not have much effect on the amount of taxes the average person in the two counties has to pay, but it will have *MORE* effect on the property owners close to it. I have already had to take a 15% devaluation because of declining land prices and the generally poor farm economy of the past few years. If the landfill does cause a 50% decline in value, I will owe close to \$100,000 on a \$50,000 piece of property. Should this happen, it is unlikely I will be able to refinance when my current contract expires. One thing the SWB could do to help offset any devaluation caused by the landfill site would be to set up a program similar to that used by corporations to help people who are transferred to sell their homes. If the employee must sell when the market is poor, the company pays the

difference between the selling price and what the home would have been sold for under more average conditions. In some cases when the home doesn't sell in a reasonable amount of time, the company will buy it and resell it later. I think SBW should pay the difference on property within 3 miles of the landfill site if the value at selling time is affected by the landfill.

1.9.1: I think part of the reason the forty acre buffer restriction was dropped is because the wetland area is in the next county and the SWB doesn't feel as responsible to protect it as they would if it was in their county.

The distance to this location will take more time and fuel than a closer site. Fuel may be cheap now , but that may change in the next 30 years.

3.1.2: The water that drains into the culvert 100 feet north of the site flows across the corner of my property. I would like to see the flow altered to keep potentially contaminated water out of my pasture.

3.1.4: The city of Hoffman is not the only available source of groundwater data. I have taken samples of my well-water and plan to continue to do so on a regular basis. Copies are included with this letter if you wish to use them.

3.3.5: I see no reason to store large numbers of tires and appliances at this site. If these items are going to be recycled, they should be sent directly to a recycling facility and processed right away instead of stockpiled. Why load them on a truck and haul them to this site where they will be unloaded and stored, then reloaded and trucked to a recycling center. It would be simpler and cleaner to haul them directly to a recycling facility.

3.3.6: The planned operation practice proposes picking up litter daily on the site. I think this should include litter that escapes the site to other properties and roads. I also think covering the ash every other day will be inadequate. Although 4.3.3 indicates the ash has a high moisture content with a slow drying rate, the surface of the ash will dry first and be picked up by any wind present; covering every day will probably be necessary.

4.1.5.1.5: There is no plan listed for vector control in the tire and appliance area. The easiest method would be not to have these items at this site.

4.1.5.1.7: A security fence around the fill site and retention pond will be necessary , not only to prevent vandalism, but to protect the general public. You wouldn't want a child or other unauthorized person to fall into the pond and drown. A fence would also keep dogs and other animals from digging up freshly buried garbage. Wildlife such as deer should be prevented from drinking out of the retention pond.

4.1.6.2: Noise during construction would be objectionable in the evenings. Stopping construction by 7 P.M. would be desirable.

4.1.8.2, 4.2.1.2, 4.2.1.3, 4.2.2.1: These sections deal with surface water. I agree with the EIS that a plan for only the 20 acre site is not adequate. I am not an engineer, but I think a second detention basin or a dike on the north and west edges of the property will be necessary to control excess runoff from portions of the property not included in the 20 acre landfill. I think a gate or valve

should be installed at the 36" culvert for use in emergencies like a basin over-topping and washout or rupture of the leachate tank.

4.1.8.3: Are synthetic covers resistant to pests? The only plan for vector control is covering the raw garbage with soil. I find it hard to believe a plastic or other covering would resist rodents. Who will determine when it is too windy to continue filling operations? Will the employees at the site decide or will there be a predetermined speed and wind direction?

4.5.2.1.1: The last sentence on page 4-99 is--Numerous exposure pathways quantitative analysis. This makes no sense either by itself or in the context of the paragraph. Is this a misprint, or does it have some obscure meaning?

5.1.4, 5.1.11: I definitely want litter picked up on my property, but I feel that permission should be obtained first. Some crops, when dry and ripe, would experience considerable damage from a crew of litter pickers.

5.1.6: In many places in this draft, the length of time for a spill or leak to do serious damage is listed. Most cases are beyond our expected lifespan and will be someone else's problem. I think it is irresponsible to use time as a defense. It doesn't matter if the problem occurs tomorrow or 89 years from now--it is still the same problem!

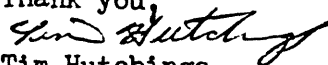
5.1.8: I think the notification should work both ways. An office should be set up not only to receive complaints of litter or excessive odor, but also to report problems after hours noticed by citizens. Some of the items listed could occur after hours: fire, vandalism, or an overrun from the holding ponds would probably be noticed by local residents.

5.1.10: If the groundwater becomes contaminated and water must be trucked or piped to the user SWB should pay for all costs that result from contamination.

5.1.15: I disagree that leachate release would be the only effect on recreation. The landfill will be visible from the golf course. I think this will affect the number of people who come to the course and also the value of the course if the owner decides to sell.

The following is a summary of my objections and concerns in their order of importance to me.

1. Relocate the proposed landfill to another more suitable site.
2. Eliminate the storage of used tires and appliances. Anything that is not going to be buried and stored permanently should not be permitted on the site.
3. Reduce the height of the completed landfill by 20'.
4. Substantially improve control of runoff and surface waters to prevent contamination of the surrounding surface water.
5. Litter, ash, vectors, and odors that escape the landfill site are a major concern. It will also be an eyesore visible from my yard.

Thank you,  
  
Tim Hutchings

Pope-Douglas solid waste ash Bypass Landfill.

**RECEIVED**

AUG 11 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

Hoffman Minn 49  
Aug 6, 1992

Dear Minn. pollution control agency:

I am a resident of the village of Hoffman and I was at Hoffman school meeting and the question was asked why they didn't pick some other places and they said the water level was too high, and it is also too high here also, and why should we put up with their garbage, as we get nothing for it besides ~~put~~ getting our water polluted, and if there is drainage from the over flow it will drain into a small river on edge of Hoffman.

I think it is a Dirty Deal.

Walter Boske  
Beta Boske

BOX 42  
Hoffman Minn. 56339

**RECEIVED**

AUG 11 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

August 6, 1992

Mr. Kevin Kain, Senior Planner  
Office of Environmental Analysis  
Minnesota Pollution Control Agency  
520 Lafayette Road  
St. Paul, MN 55155

Dear Mr. Kain:

We are writing to express our opinions of the Draft Environmental Impact Statement (EIS) prepared by the Minnesota Pollution Control Agency for the Pope-Douglas MSW Ash/Bypass Landfill to be located in southwestern Douglas County.

As the individuals responsible for coordinating and writing the Douglas County Comprehensive Local Water Plan, we feel we have a clear understanding of the complex issues surrounding the protection and management of the environment and natural resources in Douglas County.

The Water Plan outlined the need to control the generation of solid waste in the county. It emphasized the need to minimize the amount of waste generated, and encouraged recycling to reduce the waste stream. Although the reduction of the solid waste stream was seen as critical to the long range problem of waste disposal, it was never seen as the only solution. It was recognized by the water planning committee that the MSW Ash/Bypass Landfill is a necessary part of managing solid waste in the counties. There are no options. The incinerator reduced the volume of waste, but has not eliminated the need for a landfill. The ash and bypass waste must be efficiently contained, with the least environmental impact. The proposed landfill is significantly better than anything else proposed to date.

The construction plans are state-of-the-art. The built-in redundancies to protect humans and the environment from release of leachate or other pollutants seem to address all conceivable contingencies. The operation of the facility will be under constant surveillance by the public, and any lack of maintenance will be brought to the Solid Waste Board's attention immediately.

The major issue seems to be the location. No one wants the facility near their property. Even though the potential risks to the environment and human health appear to be unfounded, the fear remains. Will I be affected? Will my property lose value? Will my children have to live with a mistake we make? These concerns are completely understandable, and would be expressed about any site.

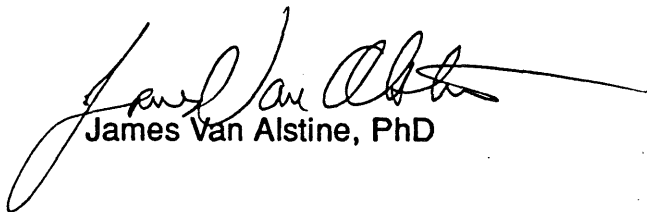
The facts remain: the facility is necessary, and the only feasible option; the facility is well designed and will be engineered to reduce risks to the absolute minimum; monitoring will allow early detection of any releases, with ample time to react and mitigate them; no matter where the facility is located, it will be in somebody's back yard.

We support the construction of the facility on the site selected, and we strongly recommend the Pope-Douglas Solid Waste Board adopt the recommendations of the MPCA. We also strongly support prompt action to expedite this much needed facility.

Sincerely:



Richard Howe, PLS (retired)



James Van Alstine, PhD



51

305 8TH AVENUE WEST  
ALEXANDRIA, MN 56308  
OFFICE: 612-762-2381

**SOLID WASTE MANAGEMENT**

**RECEIVED**

AUG 11 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

August 7, 1992

Kevin Kain  
Minnesota Pollution Control Agency  
Environmental Analysis Office  
520 Lafayette Road West  
St. Paul, MN 55155

Dear Kevin:

RE: Comments on Pope/Douglas Environmental Impact Study

Enclosed, please find the resolutions of support for the record.

Sincerely,

Dennis P. Nagle, Director  
Pope/Douglas Solid Waste Management

DPN:dp

Attached: Resolutions

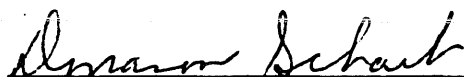
**RESOLUTION**

**WHEREAS:** Proper Solid Waste Disposal is important to the health and economics of the citizens and businesses of the City of Glenwood; and

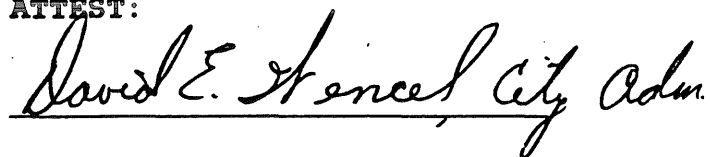
**WHEREAS:** The City of Glenwood is without landfill space; and

**WHEREAS:** The recently completed Environmental Impact Statement for the Pope/Douglas Ash/Bypass Landfill proves beyond a reasonable doubt that the proposed facility is environmentally safe.

**NOW, THEREFORE BE IT RESOLVED** that the City Council of Glenwood, Minnesota hereby supports the proposed Pope/Douglas Ash/Bypass Landfill and urges the Minnesota Pollution Control Agency to issue all necessary permits.

  
\_\_\_\_\_  
Donavan Schaub, Mayor  
City of Glenwood, Minnesota

**ATTEST:**

  
\_\_\_\_\_  
David E. Stencel, City Adm.


## RESOLUTION

**WHEREAS:** Proper Solid Waste Disposal is important to the health and economics of the citizens and businesses of Moe Township; and

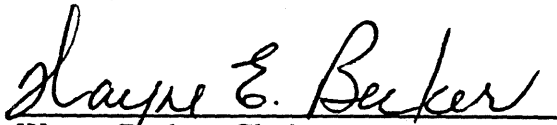
**WHEREAS:** That Moe Township is without landfill space; and

**WHEREAS:** The recently completed Environmental Impact Statement for the Pope/Douglas Ash/Bypass Landfill proves beyond a reasonable doubt that the proposed facility is environmentally safe.

**NOW, THEREFORE BE IT RESOLVED** that Moe Township of Douglas County, Minnesota hereby supports the proposed Pope/Douglas Ash/Bypass Landfill and urges the Minnesota Pollution Control Agency to issue all necessary permits.

  
Delphin Engel, Supervisor  
Moe Township, Douglas County, Minnesota

**ATTEST:**

  
Wayne Becker, Clerk

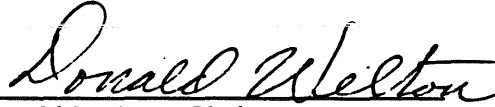
**RESOLUTION 92-15**

**WHEREAS:** Proper Solid Waste Disposal is important to the health and economics of the citizens and businesses of Alexandria Township; and

**WHEREAS:** That Alexandria Township is without landfill space; and

**WHEREAS:** The recently completed Environmental Impact Statement for the Pope/Douglas Ash/Bypass Landfill proves beyond a reasonable doubt that the proposed facility is environmentally safe.

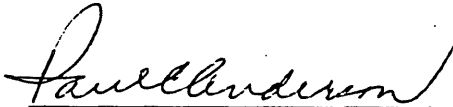
**NOW, THEREFORE BE IT RESOLVED** that Alexandria Township, located in Douglas County, Minnesota hereby supports the proposed Pope/Douglas Ash/Bypass Landfill and urges the Minnesota Pollution Control Agency to issue all necessary permits.



Donald Welton, Chairman

Alexandria Township-Douglas County, Minnesota

**ATTEST:**



Paul C. Anderson, Clerk-Treasurer

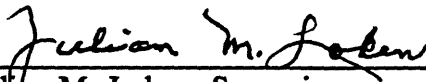
## RESOLUTION

**WHEREAS:** Proper Solid Waste Disposal is important to the health and economics of the citizens and businesses of La Grand Township; and

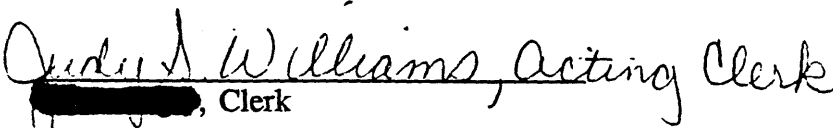
**WHEREAS:** That La Grand Township is without landfill space; and

**WHEREAS:** The recently completed Environmental Impact Statement for the Pope/Douglas Ash/Bypass Landfill proves beyond a reasonable doubt that the proposed facility is environmentally safe.

**NOW, THEREFORE BE IT RESOLVED** that La Grand Township, located in Douglas County, Minnesota, hereby supports the proposed Pope/Douglas Ash/Bypass Landfill and urges the Minnesota Pollution Control Agency to issue all necessary permits.

  
\_\_\_\_\_  
Julian M. Loken, Supervisor  
La Grand Township-Douglas County, Minnesota

**ATTEST:**

  
\_\_\_\_\_  
Clerk

RESOLUTION SUPPORTING POPE/DOUGLAS LANDFILL

WHEREAS, Proper Solid Waste Disposal is important to the health and economics of the residents and businesses of Douglas County, of which the City of Alexandria is a part, and

WHEREAS, the County of Douglas is without landfill space for use by its residents and businesses, and

WHEREAS, The recently completed Environmental Impact Statement for the Pope/Douglas Ash/Bypass Landfill proves beyond a reasonable doubt that the proposed facility is environmentally safe.


NOW, THEREFORE BE IT RESOLVED that the City Council of Alexandria, Minnesota hereby supports the proposed Pope/Douglas Ash/Bypass Landfill which will serve all residents and businesses of Douglas County and urges the Minnesota Pollution Control Agency to issue all necessary permits.

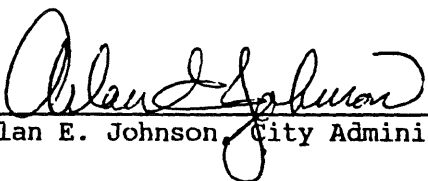
ADOPTED by the City Council of the City of Alexandria, Minnesota this 10th day of August, 1992 by the following vote:

YES: Mahoney, Collins, Weisel, Stark

NO: None

ABSENT: Pederson

  
\_\_\_\_\_  
Karl Glade, Mayor

ATTEST:   
\_\_\_\_\_  
Arlan E. Johnson, City Administrator

**RECEIVED**

AUG 12 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE


**RESOLUTION**

**WHEREAS:** Proper Solid Waste Disposal is important to the health and economics of the citizens and businesses of Douglas County; and

**WHEREAS:** Douglas County is without landfill space; and

**WHEREAS:** The recently completed Environmental Impact Statement for the Pope/Douglas Ash/Bypass Landfill proves beyond a reasonable doubt that the proposed facility is environmentally safe.

**NOW, THEREFORE BE IT RESOLVED** that the Board of Commissioners of Douglas County, Minnesota hereby support the proposed Pope/Douglas Ash/Bypass Landfill and urges the Minnesota Pollution Control Agency to issue all necessary permits.

  
Ann Malmgren, Chairman  
Douglas County Board of Commissioners

**ATTEST:**

  
Harvey D. Tewes, County Auditor

Pam Hoidahl  
Rt. 1, Box 65  
Garfield, MN 56332

August 7, 1992

Mr. Kevin Kain  
Senior Planner, M.P.C.A.  
520 Lafayette Road  
St. Paul, MN 55155

**RECEIVED**

AUG 11 1992

Dear Mr. Kain:

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

RE: Pope/Douglas Ash-Bypass Landfill

I am writing in support of the Pope/Douglas Ash-Bypass Landfill Facility. I believe that each county should be responsible for their own waste. It makes absolutely no sense to haul our ash to another county when according to all the research (E.I.S.) that has been done on the proposed property (Section 6, Solem Township) verifies that this area is safe in every aspect.

I feel that you are wasting far too much time and taxpayer's money on unnecessary holdups. A judgment in favor of the proposed landfill needs to be decided soon.

Thank you.

Sincerely,

*Pam Hoidahl*

Pam Hoidahl

August 8, 1992

Metropolitan Pollution Control Agency  
St. Paul, Minn.

53

Mr. Kain,

It is very hard to enforce individuals from having their own little landfills if Douglas County does not have a land fill of its own.

From what I understand they have a site which has been proven acceptable and I am asking for approval from your board.

Sincerely,

Allen Johnson  
Lake Mary Twp. Supervisor  
Douglas County, Minn.

**RECEIVED**

AUG 11 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

**RECEIVED**Hoffman, Minn.  
August 8, 1992

AUG 11 1992

Minn Pollution Control  
Environment Analysis Office  
520 Lafayette Road North  
St. Paul, Minn  
Att. Kevin J. Kain EIS Project Mgr.MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

Dear Sir:

I am writing you in regard to the landfill the cities of Alexandria and Glenwood want to install within one mile of Hoffman, and approximately one half mile from the Chippewa river.

I live in Hoffman as do about 600 other people. And we worry about the landfill getting into our drinking water. It will also get into the Chippewa River which flows through farmland and near other towns along the way.

There must be other places to put the landfill that isn't close to any town. All the people in town here that I have talked to object to landfill being located near our town.

Now if these two cities feel there is no danger of pollution why don't they put it between Alex. and Glenwood. It would be handier.

I am sure if Hoffman tried to put a landfill within a mile of their towns they would stop it.

The city of Hoffman would be very happy if you put the landfill somewhere else. Both for water pollution and it will also decrease the value of our homes.

We will appreciate anything you can do to prevent it from being built near our town.

Yours truly

William F. Anderson

*William F. Anderson*

**RECEIVED**

August 7, 1992

AUG 12 1992

MPC  
ENVIRONMENTAL  
ANALYSIS OFFICE8170 E. LK. Carlos DR. NE  
Carlos, MN 56319

Mr. Kevin Kain  
Senior Planner, MPCA  
520 LaFayette Road  
St. Paul, MN 55115

Dear Mr. Kain:


SUB: POPE/DOUGLAS ASH-BYPASS LANDFILL

To the many endorsements to Subject, I want to add my own.  
The extensive research done confirms the Pope/Douglas Landfill  
to be very suited for the purpose intended.

The approval of this site cannot be done too soon I believe.

Thank you.

Sincerely,



B. A. Bales  
Carlos Township Supervisor

bh



Minnesota Department of Health  
Division of Environmental Health  
925 Delaware Street Southeast  
P.O. Box 59040  
Minneapolis, MN 55459-0040  
(612) 627-5100

Post-It™ brand fax transmittal memo 7671		# of pages	6
To	Kevin Kain	From	Judith Bell
Co.	Env. Analysis	Co.	MDH
Dept.	MACA	Phone #	627-5039
Fax #	297-F-676	Fax #	297-5039

August 12, 1992

57

Kevin Kain  
Office of Environmental Analysis  
Minnesota Pollution Control Agency  
520 Lafayette Road  
St. Paul, Minnesota 55155-3898

Dear Mr. Kain:

Minnesota Department of Health (MDH) staff have reviewed the Draft Environmental Impact Statement (DEIS) on the proposed Pope-Douglas municipal solid waste ash/bypass landfill, Douglas County, Minnesota and offer the following comments for your consideration.

Comments on this DEIS are divided into three sections. Section I. discusses mitigation of impacts to public health, section II. discusses hydrological/groundwater monitoring issues, and section III. discusses the human health risk assessment. The comments in sections II. and III. are for purposes of further disclosure and clarification of issues related to public health, and in order to amplify the discussion of recommendations for mitigation of possible health impacts.

**I. Mitigation of Impacts**

**A. Air Emissions**

Given the estimate of a non-negligible lifetime cancer risk at a reasonable maximal exposure (three in 100,000 or 3E-5), consideration should be given to installation of a gas collection system and permanent landfill gas monitoring system (DEIS, pp. 1-12, 4-13).

**B. Groundwater/Drinking Water Contamination**

In order to facilitate maintenance of the groundwater collection system, it is recommended (cf. Technical Work Paper 4, p. 31) that extra manholes be installed to make it possible to clear accumulated debris. The Technical Work Paper correctly points out that once debris is placed on the liner, repairs will no longer be possible (see Section II. C.).

If horizontal flow dominates in the clay till then the monitoring well network will be sufficient to detect any leakage from the landfill. If vertical flows dominate, the till monitoring wells are too far away from the landfill to detect leakage and the first indication of a problem will be seen in the sand aquifer wells. The existing data indicate that flow in the sand aquifer is

not well characterized, suggesting the possibility that the landfill is in a recharge area for this aquifer (see Section II.A.). With a poorly defined flow direction, several additional monitoring wells may be necessary to detect any release from the landfill. The one initial downgradient well in this unit is not a sufficient safeguard. All of the groundwater elevation data collected from the site indicate that this is a side gradient, rather than a downgradient well. Thus, we suggest that all three planned downgradient wells be constructed initially, and that at least the water levels be monitored, so that flow in this aquifer can be determined, and an appropriate well be included in the regular sampling and analysis (see Section II. C).

The DEIS (pp. 1-18-19) mentions several design alternatives and mitigation measures which could be incorporated into the project to minimize possible impacts on groundwater and drinking water. These include a composite clay and synthetic membrane liner for ash, which is now required by current rules. Also mandatory are increased environmental monitoring, improved laboratory procedures for test data, increased recycling and hazardous waste management, submission of revised plans for liner freeze protection and erosion protection, and increased closure and post-closure budgets.

Other measures mentioned in the DEIS could also reduce the probability or extent of groundwater releases, including construction of separate ash and municipal solid waste bypass cells and construction of a composite liner beneath the solid waste bypass cell, more quality assurance tests during construction, negotiation of agreements to compost some of the solid waste, submission of a construction dewatering plan, installation of a scale at the landfill (for better control of intake) and construction of a security fence around the leachate storage/loadout facility (to minimize the possibility of spills). Separate retention ponds for surface drainage and groundwater drainage also appear to be necessary, since present plans appear to be inadequate to handle expected volumes; groundwater contaminated by leachate which penetrates the liner should also be separated from surface water (p. 4-19).

## II. Site Hydrogeology and Groundwater Monitoring

In addition to the DEIS, Technical Work Paper 4, Groundwater Collection System, Technical Work Paper 5, Monitoring Plan, and Technical Work Paper 6, Surface Water Hydrology were reviewed. The review concentrated on the site hydrogeologic setting and the possible exposure pathways of landfill contaminants by ground and surface water. Additional hydrogeologic and design information was obtained by review of the MPCA files.

In general the investigations and analysis summarized in these documents appear to be complete and appropriate. Several hydrogeologic investigations have been conducted at the site and the information that they have generated is state of the art. With exceptions discussed below, most of the interpretations of these data appear justified.

MDH's main concern at this site is that the uppermost aquifer that could be impacted by the landfill is used locally for both private and municipal

Kevin Kain  
Page 3  
August 13, 1992

potable water supplies. Therefore, most of our efforts have been to assess the possibility of that aquifer being impacted, and to evaluate the monitoring network for capability to detect any movement of contaminants from the landfill to this aquifer.

The site has been well studied and, from a groundwater perspective, it appears to be suitable for a landfill. The only real concern is presented by a sand aquifer that underlies a relatively thin zone of clay till that is directly under the landfill. This is the major potable water aquifer for the area. If the designed features of the landfill function properly, there is little chance that this aquifer will be impacted without sufficient warning. If these features fail, there is an approximately even chance that the monitoring well network will not provide adequate warning of groundwater impacts.

#### A. Hydrogeologic Setting

The site area appears to be underlain by two very different geologic units that each hold groundwater. The upper unit is predominantly composed of sandy clay with some gravel that varies in thickness from about 20 to 50 feet. This unit appears to evenly overlie the entire site, regardless of topography. Some soil samples taken from this unit indicate the presence of fractures in the clay till. Minor lenses of sand and gravel have also apparently been observed in this unit. The lower unit is predominantly composed of sand and gravel with a thickness in excess of 100 feet. This unit is reported to contain minor lenses of silt and clay. Although there are no bedrock wells in the vicinity, the bedrock is thought to be in excess of 400 feet below the ground surface and impermeable. Groundwater occurs in both the upper clay till and the lower sand units, but flow in these two units appear to be very different.

Groundwater movement in the clay till unit is dependent on both the ability of the upper clay till materials to convey ground water (hydraulic conductivity) and the varying elevation of the groundwater as it is measured in the site wells (hydraulic gradient). This movement can be three dimensional, that is it can be downward as well as lateral, so both the horizontal and vertical components of hydraulic conductivity and hydraulic gradients must be evaluated. Slug tests were conducted in the monitoring wells to assess the horizontal hydraulic conductivity and ranged from  $2.7 \times 10^{-8}$  to  $2.4 \times 10^{-5}$  (seven tests). Laboratory tests of till materials were used to estimate the vertical hydraulic conductivity and ranged from  $1 \times 10^{-8}$  to  $1.3 \times 10^{-6}$  (19 tests). Since different methods were used to estimate horizontal and vertical hydraulic conductivity, it is uncertain that these values are comparable. This uncertainty is amplified when the broad range of these measured values is considered. We regard the horizontal and vertical values as close enough to suggest that they are essentially the same. Sets of monitoring wells constructed at the same location, but open to deeper intervals of the clay till unit, have sharply and progressively deeper water levels. This indicates that there is a strong vertical hydraulic gradient relative to the horizontal gradient. This gradient, in conjunction with the hydraulic conductivity information, suggests that flow in the clay till unit may be predominantly downward. The downward gradient and the generally very low hydraulic

conductivity of the unit indicates that there is probably significant leakage of groundwater from the unfractured homogenous regions of clay till unit to the sand unit below.

The least measured aspect in any analysis of the groundwater flow in the upper till is the presence of fractures. Fractures could provide preferential horizontal or vertical pathways of groundwater flow. One monitoring well completed in the till is reported to yield a high groundwater flow, perhaps due to flow in the fractures in the clay till. Although till fractures were noted in samples collected during the hydrogeologic investigations, there was no attempt made to assess the potential impact of these features. The geologic history would suggest that there may be significant fracturing of the clay till at the site. The large valley and the underfit ephemeral stream immediately west of the proposed landfill appear to be part of a glacial tunnel valley system extending north and west of the site area (H.C. Hobbes and J.E. Goebel, 1982, Geologic Map of Minnesota, Quaternary Geology, Scale 1:500,000, Minnesota Geologic Survey). This tunnel valley was apparently formed when stagnant ice occupying the volume of the valley melted, draping the upper clay till layer that had been deposited by a subsequent glacier on the surface of the lower sand unit. Deformation and fracturing of the clay till unit occurred as it assumed the shape of the lower sand during melt out process. This deformation and fracturing would be expected to be most extreme in the areas of highest relief, along hillsides similar to the proposed landfill location.

In contrast to the clay till unit, the sand unit appears to have much higher hydraulic conductivity. As mentioned above, this sand unit serves as the major local aquifer, used by both individuals and communities. Although a flat hydraulic gradient and consistent flow direction would normally be expected in this type of aquifer, the groundwater elevations measured in the on-site monitoring wells do not define a consistent flow direction. The regional pattern of surface water elevations suggest that flow should be generally westward, parallel to the ephemeral stream on the site and toward the Chippewa River.

The proposed location of the landfill is along and cut into the northward facing slope of the valley that contains the ephemeral stream. The proposed cut will bring the base of the landfill to within about ten feet of the upper surface of the sand unit and below the surface of the water table found in the upper clay unit. Plans for construction of the landfill include a groundwater collection system to dewater the clay till unit, a compacted clay liner, and a leachate collection and storage system.

#### B. Designed Groundwater Protection

The groundwater protection system will include: a leachate collection system which will underlie the waste, and a four foot thick clay liner which will underlie the leachate collection system with a groundwater collection system below the liner. The leachate collection system will apparently be a drainfield in a layer of granular material protected above and below by a

Kevin Kain  
 Page 5  
 August 12, 1992

permeable but tough geo-textile. The leachate collection system will drain to a collection tank that will periodically be pumped out. The clay liner will be compacted to minimize the hydraulic conductivity, and will be a minimum of four feet thick. An additional geo-textile will be placed between the clay liner and the groundwater collection system below. The groundwater collection will apparently be a drainfield similar to the leachate collection system and will drain to a detention pond that also accepts surface water drainage.

### C. Proposed Groundwater Monitoring Network

There are four elements of the groundwater monitoring system: monitoring wells open to the upper till unit, monitoring wells in the lower alluvial unit, sampling of the outflow from the groundwater collection system, and surface water monitoring from the surface water detention pond. The key element of this system is the groundwater collection system.

If It Works. As long as the groundwater collection system is monitored and remains functional, it will be sufficient to provide any indication of leakage through the clay liner. Although similar designs have been constructed, this landfill technology is relatively new and it isn't certain that it can survive the unknown lifetime of the landfill. Several important improvements to the design were suggested in the Technical Work Paper 4 for improved maintenance. Most importantly, it is recommended (p. 31) that extra manholes be installed to allow periodic cleaning of the groundwater collection pipes. This paper also correctly points out that once debris is placed on the liner, repairs will no longer be possible.

If It Fails. If horizontal flow dominates in the clay till then the monitoring well network will be sufficient to detect any leakage from the landfill. If vertical flows dominate, the till monitoring wells are too far away from the landfill to detect leakage and the first indication of a problem will be seen in the sand aquifer wells. The existing data indicate that flow in this aquifer is not well characterized, suggesting the possibility that this is a recharge area for this aquifer. Without a well defined flow direction, several wells may be necessary to detect any release from the landfill. The one initial downgradient well in this unit is not a sufficient safeguard.

## III. Human Health Risk Assessment

In addition to the DEIS, Technical Work Paper 7, Air Quality Ecological and Human Health Risk Assessment, and Technical Work Paper 8, Surface and Groundwater Ecological and Human Health Risk Assessment were reviewed.

### A. Air Quality Assessment

The major result of the health risk assessment is a finding of a non-negligible cancer risk (approximately three in 100,000 or  $3E-5$ ) to a reasonably maximally exposed individual living near the landfill. This risk comes from inhalation of landfill gases. This risk is an overstatement of an upper bound estimate for reasons mentioned in our memos of February 4, 1992

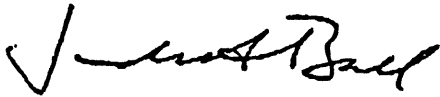
Kevin Kain  
Page 6  
August 12, 1992

Allowable Limit (RAL) for drinking water, in the event of a catastrophic failure. These chemicals include arsenic (25 times the RAL), cadmium (1/3 of the RAL), chromium (3/8 of the RAL), manganese (6 times the RAL), acetone (3/8 of the RAL) and 2-butanone (2 times the RAL). By this criterion, several additional chemicals could reach significant levels in groundwater, including lead, nickel, selenium, methylene chloride and t-1,2-dichloroethene. Lead might reach a concentration of 10 ug/L in the outwash aquifer. This is 1/2 of the present RAL of 20 ug/L, and 2/3 of the new EPA Maximum Contaminant Level (MCL) of 15 ug/L. Nickel might attain a concentration of 6/10 of the RAL, selenium a concentration of 4/10 of the RAL, t-1,2-dichloroethene a concentration of 1/3 of the RAL and methylene chloride a concentration of 4/10 of the RAL.

The DEIS points out that the proposed landfill needs to be redesigned to comply with current solid waste rules. Other design and monitoring changes suggested here and/or mentioned in the EIS would substantially reduce both the likelihood of a catastrophic failure and the likelihood of drinking water impacts in the event that a landfill failure results in groundwater contamination. These issues are discussed in more detail in Section I. above.

If you need to discuss these comments, please call Dr. Rita B. Messing at 627-5052. Thank you for the opportunity to review this DEIS.

Sincerely,



Judith A. Ball  
Environmental Review Coordinator

cc: Rita Messing

JAB:rlk

58

Calvin R. Sperling  
8416 Queen Annes Drive  
Silver Spring, MD 20910

11 August 1992

Mr. Kevin J. Kain, EIS Project Manager  
Minnesota Pollution Control Agency  
Environmental Analysis Office  
520 Lafayette Road North  
St. Paul, MN 55155

Dear Mr. Kain:

Please accept the following as formal comment on the Pope-douglas Municipal Solid Waste Ash/Bypass Landfill Draft Environmental Impact Statement (EIS). My comments pertain primarily to the aspect of native prairie at the proposed site. The completeness and detailed nature of the vegetation study are to be commended.

The results of the prairie vegetation survey at the proposed site indicate that significant prairie vegetation remains. The site's significance is that prairie remnants of this type are not common in Douglas County and should not be further degraded by landfill development activities. The statement that restoration management of the prairie site would require "extremely extensive measures, many years, and would be exceedingly costly" (p. 4-93 of the EIS) is based on speculation. A complete EIS would compare costs of restoration management of the existing prairie with costs of the proposed attempted establishment of a few shallowly rooted plant species - a far cry from all the elements of a prairie ecosystem which currently exist at the site. It is illogical to believe that mitigation through establishing a few grassland species can compensate for the loss of existing prairie at the site - regardless of its less than pristine nature. I find the EIS inadequate in reviewing proposed protection of the existing prairie vegetation and in the proposed mitigation for loss of prairie.

The EIS does not evaluate effects of construction, operation and closure activities on the prairie remnants or address the impact of those activities on animal species of State special concern identified at the site, the Poweshiek Skipper (*Oarisma poweshiek*) and those known to frequent habitat in the immediate vicinity and suspected of occurring at the site, the Upland Sandpiper (*Bartramia longicauda*). The survey indicates that the Poweshiek Skipper is probably more abundant than results of the survey indicate. The EIS does not evaluate impact of the proposed activities on this species, especially the loss of habitat or effects of noise, blowing litter and ash. Construction and operation of a landfill at the site is not compatible with maintaining habitat for this State species of special concern.

**Mr. Kevin J. Kain**  
**Page 2**  
**11 August 1992**

For the Upland Sandpiper, the survey dates failed to include peak migration periods (early May) or the period of resident population nesting activity (most of June). A thorough survey during optimal period would, no doubt, have discovered this species at the site. In regard to the above species of special concern the EIS is contradictory in stating that "no rare or unusual biota" are present (p. 1-9). I find the EIS lacking in its assessment of the impact on animal species of special concern.

Given the inadequacy of the EIS to address the difficulty to protect, monitor and restore the prairie ecosystem at the site I believe construction of a landfill at the proposed site will irreparably degrade this remaining representative example of Minnesota's fragmented and fragile prairie ecosystem. The EIS does not evaluate or propose mitigation measures for habitat loss as that loss would affect species of special concern at the site.

Rather than investing public funds in preserving the existing prairie and attempting to create new prairie plantings atop the closed landfill, the Pope-Douglas Joint Solid Waste Board (SWB) should admit that their proposed mitigation efforts would, at best, be inadequate. A far superior alternative to the prairie question would be for the SWB to purchase a better quality prairie remnant in Pope County (provided one exists) and transfer ownership to an appropriate land management agency such as the Minnesota Department of Natural Resources (DNR). The EIS, while alluding to this mitigation (p. 4-95), fails to include it as one of the summary mitigation efforts (p. 1-19, 1-20). The SWB should pursue this alternative immediately, in collaboration with DNR, if they persist in proposing the Solem Township site for a landfill and as a condition of any permits considered for the site pending outcome of the final EIS. This issue should be further examined in a final EIS.

The EIS fails to discuss effects of construction on the seven acres of wetlands at the site or suggest mitigation. Replacement of existing wetlands with the proposed surface water retention pond would not be acceptable as this pond will require periodic dredging, greatly reducing it's function as a wetland. The proposed construction would adversely affect existing wetland, impacts of which should be included in a final EIS. This is especially important as this was one of the initial criteria of concern identified by the SWB as early as 1983 (p. 2-1).

The proposal to direct ground water to the retention pond is not acceptable (p. 4-19). The plan to lower ground water levels at the site has not been reviewed in the EIS as the plan relates to similar type systems so as to determine effectiveness and reliability, as stated in the Scoping Decision Document. Likewise, the long-term effects of this system are not addressed. The difficulty or complete inability to maintain the ground water collection system, once buried beneath fill, and the consequences of failure (4.2.1.4.3 of the EIS) do not favor adopting this method as proposed by the SWB.

Mr. Kevin J. Kain  
Page 3  
11 August 1992

The EIS fails to address the operation of a proposed 25,000 gallon ground water collection tank. A ground water collection system will need to be regularly monitored for leachate contamination, probably at least every 9-16 days based on the anticipated ground water and capacity of the proposed holding tank (p. 4-12). A final EIS must include impacts and alternatives to all proposed methods of handling discharge from the ground water collection system.

On economic and social issues, I find the EIS inadequately discusses the visual perspectives of the proposed landfill. Enhanced visual perspective figures from technical work papers should be included in a final EIS.

Given the required engineering changes identified in the EIS, the initial permit application will require substantial modification. EIS economic analysis of alternatives to the proposed site must be calculated based on revised cost estimates.

Based on the inadequacies of the site as identified by the EIS and those presented above, I am opposed to this site as a Municipal Solid Waste Ash/Bypass Landfill. Alternative, more economically feasible sites without perched water tables, native prairie vegetation, and State species of special concern can be found in both Pope and Douglas Counties.

Sincerely,



Calvin R. Sperling

Aug 8, 1992

Dear Sir:

59

I am writing concerning the landfill which is being considered on the Grant-Douglas Co. line. Seems they came as close to the Grant line as possible. We in Hoffmann - Grant Co are concerned about the effect of the landfill on the <sup>water in area</sup> river and lakes and water supply.

I think they should consider another site more centralized in Douglas and Page Co. where they surely have a lot of waste land.

Henry Westrom  
Hoffmann-Murray  
Box 173

RECEIVED  
56339  
AUG 11 1992  
MPCA, Ground Water  
& Solid Waste Div.



# Red Rock Ranch

Northwest Shore Red Rock Lake  
Hoffman, Minnesota 56339

Robert L. Johnson  
Phone 986-3972

## RECEIVED

AUG 14 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE



Kevin & Karin GIS Project Manager

Sir,

The Pope-Douglas Landfill, which is totally inferior continues to be considered with blind disregard for all the problem. Limited area for development, which was brought out in the engineering firms' comments.

There by the reason for a design needs a 40 foot deep into the hill with the project reaching another 40 ft up about ground.

40 foot down reaches a perched water table. This will create construction problems, making it hard to get the tubes and liners in place. It will lower the water table and dry up some local wells. Keeping water out of the garbage in order to protect the Chipewau river and water for the town of Hoffman. We'll be creating problems for all the generations that follow.

There is not a windier site in all of Douglas County. There is no protection from any direction. To provide screening, that would be effective will be almost impossible.

With the complex problems limited to this site it compounds the chance of environmental disaster.

The permit hasn't addressed the screening problems. hasn't set up a indemnity program for local wells, and

61

RECEIVED

AUG 14 1992

Kevin Kain EIS project manager

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

As a property owner next to the proposed Landfill Dam concerned.

First This EIS is obsolete, as so many things have changed since original draft!

My biggest concern is water both underground and runoff.

I have a shallow well and think as perched water is lowered it will affect my volume of water. It also has the potential to contaminate my water as they are the same level. The runoff is not addressed properly as the EIS uses far fewer acres than actual. I have seen this road wash out partially as water goes over the road. in heavy rain, also what happens after closure? How many years will it be monitored? How long will the leachate be collected after closure? The drainage of perched water will go on forever.

My 2nd concern is wind, there is no way the northwest wind can be screened. My property will be subject to litter blowing. Also the smell that goes with it. Leachate has a terrible smell.

Visibility - why was this site selected it can be seen from every direction - The City of Hoffman will suffer from lack of development. Who wants to look out and see a pit of garbage?  
It's also visible from Highway 27 over

and the contamination of crop and pasture lands.  
devaluation of property near the site.

A neutral third party should be hired to study these problems and have some guidelines in place.

This site not only impacts the quality of life here on our farm, but puts our livelihood at risk.

Sincerely,

Bob ~ Joy Johnson

August 10, 1992

Kevin J. Kain  
 520 Lafayette Rd. North  
 St. Paul, Mn. 55155

**RECEIVED**

AUG 14 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

Dear Kevin

We, the town board of Solem Township, Douglas County give the following reasons why the landfill should not be in Solem Township.

1. The elevation of the site - the ash will blow all over our township.
  2. If water is run out of that site as is stated by you - will our wells dry up?
  3. Ash is so contaminated - how will you contain it, when you have a 7-8 inch rain downpour sometime?
  4. The location by a beautiful lake and golf course will be an eyesore for us and future generations.
  5. The devaluation of our property in our township.
  6. The upkeep of the road for our township.
  7. How will you clean it up when it gets contaminated?
  8. Farmers can't destroy wetlands, so why can our County?
  9. Hauling it that far - is wasting our taxpayers money.
  10. High - windy site will surely be a problem.
- Thank - you for reading this letter

Solem Twp. Supervisors - Lucille Johnson, Clerk  
 Terry Randt - Kenneth Anderson - Norman Goodwin

1100 cars a day will see this garbage

No way would the politicians allow this to happen 1 mile from Alexandria.

They have turned down business because of visibility from highway, does this not apply in our area also?

In summary

1. This site has the potential to contaminate the Hoffman water supplies, the Chippewa River.
2. Wind cannot be controlled.
3. the project is far to expensive to engineers yet the S.W.B. goes ahead! not very smart or lack of common sense!
4. It will be visible from all directions.

Thank you

Rodger Anderson

Hoffman - 11111  
56339.

Box 438.

**Hilda Bettermann**  
State Representative

District 11B  
Douglas, Grant and  
Stevens Counties



**Minnesota  
House of  
Representatives**

Robert Vanasek, Speaker

**COMMITTEES: EDUCATION, HIGHER EDUCATION DIVISION, COMMERCE, ECONOMIC DEVELOPMENT,  
LABOR-MANAGEMENT RELATIONS**

August 6, 1992

Mr. Kevin J. Kain  
EIS Project Manager  
Environmental Analysis Office  
Minnesota Pollution Control Agency  
520 Lafayette Road  
St. Paul, MN 55155

**RECEIVED**

AUG 14 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

Dear Mr. Kain:

Re: Pope-Douglas Solid Waste Board Permit Application for  
facility for incinerator ash and bypass landfill

Currently, the legislative district which I represent includes most of Douglas County and all of Grant County. The landfill has been a controversial issue in our area since it was first proposed due to its location within Douglas County which is adjacent to the Grant County line near Hoffman.

I have spent a considerable amount of time listening to the arguments on both sides of the issue. I have reviewed a summary of the Environmental Impact Statement. This letter is written in support of the proposed landfill site in Solem Township, Douglas County. The following are some of the reasons why:

1. Douglas County is in dire need of an ash/by-pass landfill facility NOW. Currently the Pope-Douglas Waste Management Board is forced to haul its ash to Wisconsin at a tipping fee of \$37.45 per ton, plus the cost of hauling. Those out-of-state doors may soon be closed to our Waste Management Board.
2. I believe that communities, except in rare instances, should be responsible for their own solid waste/ash disposal. Other communities should not have to bear the burden of someone's else's waste. Recycling can be promoted better on a local level as well to reduce the handling of solid waste or resulting ash.
3. The proposed site has been extensively evaluated and the public has been given ample opportunity for input. The EIS reflects extensive study done on environmental, ecological, health, safety, economic, and other issues connected with siting such a landfill. In fact, preliminary costs for siting the proposed landfill have affected Minnesota taxpayers by approximately \$600,000 already.

Mr. Kevin Kain  
Page 2  
August 6, 1992

4. As far as site alternatives are concerned, the proposed site was volunteered by a landowner in Solem Township, which is far less controversial than having to obtain the property by eminent domain. This should be a big plus for area residents and for the Management Board itself.

5. The proposed monitoring and the leachate collection process would safeguard residents, the groundwater, and the area's natural resources to the highest degree possible.

I recommend approval of the proposed site and that a solid waste permit be granted. A lot of thought has gone into my decision to make this recommendation. The residents of the Hoffman, Grant County, area are as much of a concern to me as the residents of Douglas County and Pope County. The MPCA, the Pope-Douglas Waste Management Board, and the concerned citizens of the Hoffman area, I believe, can work together to make this project work.

I commend and appreciate the work that the concerned citizens of the Hoffman area have done in voicing their concerns. Without their hard work, it is possible that many of the concerns they have expressed could have become a reality.

If you have any questions regarding my recommendation, please feel free to contact me.

Sincerely,

  
Hilda Bettermann  
State Representative

TO: Mr. Kevin Kain, MPCA  
FROM: Alan Zeithamer  
DATE: August 11, 1992  
SUBJECT: Douglas/Pope Landfill Proposal

**RECEIVED**

AUG 14 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

Please accept these comments concerning the Douglas/Pope Landfill Proposal and EIS for the proposed project.

The EIS seems almost to be outdated or directed at the wrong engineering proposal. The indications are that a revised and quite different design plan must be developed. The EIS speculates as to what that new plan "might be" rather than evaluate actual designs and plans.

The proposed site, because of the high water table, will be more likely to fail or leak. Several of these "new generation" landfills in less dangerous sites have already leaked. Because of the water and the high potential for leaks, an elaborate leachate collection system must be designed, built and operated. Who will be responsible for the continued operation of this collection system after the landfill is closed? The leachate will be a potential problem for decades beyond. Who will keep the system operating? It seems most of the problems occur after landfills are closed and nobody wants to be responsible. More importantly, what will be done with the leachate when the incinerator closes or is shutdown? The life of the incinerator should not be expected to exceed twenty or thirty years.


The garbage and ash from Pope and Douglas counties has already created two environmental problems or disasters. The LaGrand Landfill is on the Super Fund list and the leaking Kluver Landfill. Yet the county officials still seem intent on creating a third site with a high potential for failure. The site they have selected has serious problems and difficulties to overcome. Yet the county officials want to design and build only enough to "get by." Compare Pope/Douglas designs plans with the much safer design implemented at the USPCI Landfill in Rosemount.

Mr. Kevin Kain  
August 11, 1992  
Page 2

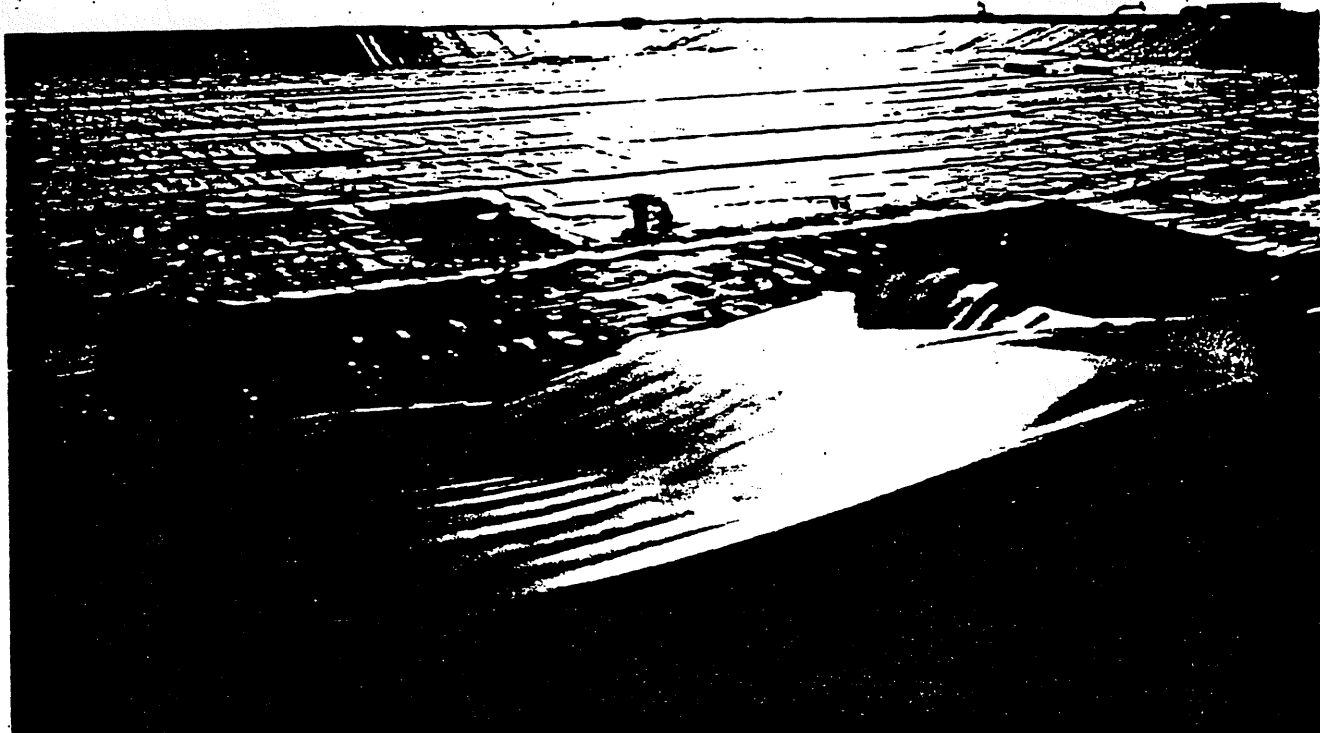
	<u>POPE/DOUGLAS</u>	<u>USPCI</u>
LINERS:	None in design 1 added because of Federal law	2 synthetic liners 1 clay liner
LEACHATE COLLECTION:	1 combined system	2 collection systems
WATER ACCEPTED:	Mixed waste plus incinerated ash which is classified hazardous in other countries	Only non-hazardous
TESTING CAPABILITIES:	None	On-site laboratory confirm waste acceptability
LANDFILL LOCATION:	Near wetlands, near highway, near homes, near recreation, near another city	In an area compatible for heavy industry

The Rosemount Landfill exceeds the Pope/Douglas Landfill in every area and concern. Why isn't Pope/Douglas designing and proposing to meet the same standards? When protecting the public health and the environment, why take shortcuts? There can be no compromise.

Sincerely,



Alan Zeithamer

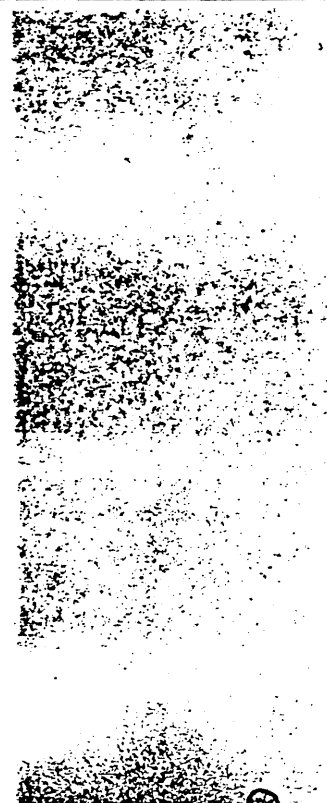


Minnesota Industrial Containment Facility-Rosemount, Minnesota.

Is your non-hazardous industrial waste managed in the safest manner possible?

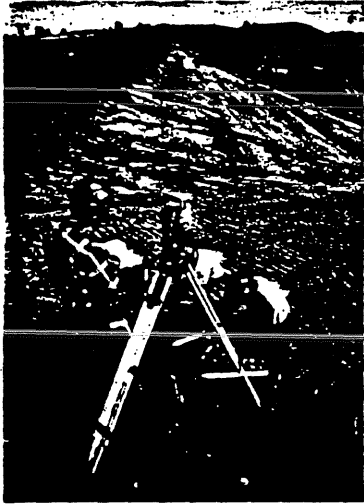
USPCI's new dedicated facility in the Minneapolis-St. Paul metro area will open in late

1992 to provide a safe, long-term waste management option.



## A NEW DIMENSION

The Minnesota Industrial Containment Facility (MICF) adds a new dimension to USPCI's full range of environmental services. This dedicated waste management facility



will be operated with the same quality standards practiced over the company's 24-year history. To offer customers unequalled environmental protection and reduce the potential for future site liability, USPCI built the facility with several considerations in mind:

- 1 The site was previously found suitable by local and regional agencies because of the compatibility of the area with heavy industry.
- 2 The MICF facility is rail-served for safe, efficient waste transport.

Design standards for the landfill (double synthetic liners, an impermeable clay base, and two leachate collection systems) exceed state and federal requirements for this class of waste. Only non-hazardous industrial waste will be disposed of at the facility. Customers' wastes will not be mixed with hazardous or municipal wastes. An on-site laboratory samples waste to ensure that non-conforming materials don't enter the facility.



**A commitment to quality**  
USPCI is committed to environmental quality and intensely obligated to its customers and the communities in which it operates. This commitment has been fundamental to the company's operations for 24 years, and it will continue with MICF.

**USPCI Corporate Office**  
515 West Greens Road  
Suite 500  
Houston, Texas 77067  
(713) 775-7800

**Customer Service Center**  
1-800-877-2416

To: Minnesota Pollution Control Agency, St. Paul, MN 55155:

There are many factors that we could cite as additions to your Environmental Impact Statement on the Pope/Douglas Municipal Solid Waste Ash/Bypass Landfill proposed for the Solem site one mile east of Hoffman, MN, along Hwy 27. The most important of these, however, are wind, water quality, the view from all points east, west north and south for several miles which could also include some concerns about Hoffman's future attraction as a stable economic center which we feel it has been for the past 100+ years.

There is, in our minds, no way that the area can be guarded against prevailing northwest winds since the north and west sides of the tract of land are many feet below the grade of the hilltop where the landfill is to be placed. There would have to be a wall at least 75 feet high, and perhaps even higher. So we are very concerned that there will be debris along our roadways to the east and south of the site.

There is very little assurance that the water quality under and surrounding that landfill will remain as it is at the present time. The people of Hoffman which number more than 600, deserve some kind of insurance that that quality of water is constant for many, many years in the future.

The view of the landfill from the surrounding countryside and the City of Hoffman will by no means be an enhancement as far as tourism is concerned. We will no longer be able to tell people what a beautiful little community we have to live in here, and we do not believe that is stretching the truth at all.

As a community, we are constantly struggling for economic security. We are having trouble keeping our young people out here because there is nothing for them to do in Hoffman at the present time. We have tried to keep as much business in our city as possible. We have tried to work with groups and foundations to add to the economic development of our community, as well as to enhance the look of our community to attract people instead of drive them away.

We feel that the construction of a landfill so close to our city will work against what we have been working for so long. Anyone who has looked at the per capita incomes and other statistics of the counties in the state will realize that Grant County is not one of the most wealthy, so we need to keep this in mind every time we make a move to upgrade our community. We try to make improvements that will not be a tax burden to our citizens.

Proposing a landfill this close to an already depressed area is a mistake--environmentally and economically. Your Citizens' Board has the authority to deny the request of the Pope-Douglas Solid Waste Board. We sincerely hope they do so.



Harvey V. Beuckens, Editor,  
The Hoffman Tribune  
Hoffman, MN 56339-0247

**RECEIVED**

AUG 14 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

AUGUST 10, 1992

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**RECEIVED**

AUG 13 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

To: Kevin Kain  
EIS Project Mgr.  
MPCA Environmental  
Analysis Office  
520 Lafayette Rd  
St. Paul, Minn.  
55155

Gerald & Julie Briese  
7271 Sandy Hill RD SW  
Hoffman, Minn. 56339

Thank you for extending  
the comment period on the  
proposed Douglas County landfill.  
As residents of Douglas  
County we have some concerns.

(1) This is a project that  
from the beginning has been  
hidden from those of us  
whom it directly affects. On  
pages 2-5 and 2-6 of the  
EIS several meetings are cited  
which apparently took place.  
We were not informed of these  
meetings. We will take the  
blame for not always reading  
the paper thoroughly, but  
feel communications were very poor.  
This project was kept hidden  
because the Douglas County  
SWB knew it would be



controversial to those of us who call Hoffman home.

(2) One of our biggest concerns is our water supply. Our livelihood as well as our lives is dependent on clean safe water. We realize that those who prepared the EIS feel contamination is unlikely. However, we are concerned about the chance that it will happen, however small that chance is. We need some answers on what will be done for those of us who would be affected. Your contingency fund figure is not enough to cover one farm or business let alone an entire community.

(3) The site is poor and has been from the beginning. You (the MPCA) should be pushing the DSWB to pursue a more suitable site. This site ~~is~~ requires extensive costly excavation, is too close to a wetland that is important to us and is too far from the center of waste generation. It is socially and economically



unacceptable to those of us who live here. Yes, it was a volunteer site. Volunteered by a single person. It was not volunteered by ~~the~~ the community, or by those who live in close proximity.

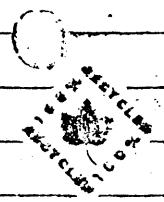
(4) On page 4-38 you site state requirements for recycling. Our question is, what is the city of Alex waiting for? Recycling should be made mandatory, and those who fail to comply should be fined. Simple! Those of us who live in the country, and are responsible for our own waste have been doing this for years. We recycle and re-use everything we can, and are careful about what we purchase. We don't feel Alex can ever expect us to willingly accept their garbage, when their not even meeting us half way.

Our concerns over this landfill could fill another book if we had the time. We ask that when you sit down to



make this decision you find it in your hearts to make the right decision for our community. We want this community to continue to be here for our children and grandchildren for generations to come. Dont let pditics or bureaucracy make this decision for you.

Thank you,  
Gerard & Julie Briese



**RECEIVED**

AUG 13 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

Kevin J. Kain

EIS Project Manager  
and Pollution Control Agency  
Environmental Analysis Office

I am writing in regards to the "Pope-Douglas Municipal Solid Waste Ash/Bypass Landfill" Draft. What I would like to know, is how a small group of people can sit down and make a decision that will negatively affect the people in any given community. Basically forcing people to play Russian Roulette with the very water it takes to sustain life! Personally, I don't want any more toxins, chemicals or pollutants of any kind brought anywhere near me or my family. We already drink bottled water. How much worse is it going to have to get before people take a stand - yes! it's going to affect every single person living in the area. I don't want to have to be one more of those counties/cities that have strange outbreaks of Leukemia or other

life threatening diseases. My family is too precious to me to let any landfill - especially one I never helped create - come in to my area without a fight. The so called "leaders" of this community had better put Human Life before the almight dollar. If they can vote to let this landfill go through - I say they should have to be the first people to build on the site in future years, and have their children and grandchildren drink the water. If they can agree to that at least there will be some twisted justice!

We have already spoken to "Clean Water Action" out of Fargo/Moorhead about this. Hopefully this letter will help stop some of the water and land pollution of this small ~~part~~ portion of the planet.

Sincerely,  
Sara Salisbury  
202 Iowa Ave  
Box 41  
Hoffman, MN 56335

City of Hoffman  
Office of the Clerk  
Hoffman, MN 56339

**RECEIVED**

AUG 13 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

July 8, 1992

Mr. Kevin J. Kain  
EIS Project Manager  
Environmental Analysis Office  
Minnesota Pollution Control Agency  
520 Lafayette Rd.  
St. Paul, MN 55155

Re: Questions and comments on proposed Pope/Douglas  
ash/bypass landfill

Dear Mr. Kain:

Study should be done on infectious waste, including disposable diapers that will end up at the landfill from Alexandria, Glenwood and Starbuck hospitals plus all the nursing homes in the two counties.

A more indept study should be done on ash at Alexandria incinerator. We feel tests are not truly accurate. Example: Burning of paint filters from a Glenwood manufacturing plant at a selected time as not to upset as test results. Does the Alexandria incinerator have a Hazardous Waste Burning Permit?

Do rules say leachate has to be treated? Is use as quench for ash considered treatment? At what level is leachate contaminants acceptable for quench? How is this to be monitered? With all the different by/pass waste chemical combinations plus ash who really knows what leachate contaminates will be several years from now, there needs to be a good treatment plan in effect.

Retention pond and other parts of the facility should not be placed in natural drainage way.

Settlement offer closure: It will be hard to maintain native grasses on each closed cell if you have to keep landscaping due to settlement.

With steep side slopes there is more potenal for erosion.

The Poweshief shipper butterfly, an endangered species, was found on the site, this and native prairie grasses should not be distrubed by a landfill.

*City of Hoffman*

Office of the Clerk  
Hoffman, MN 56339

This site is not feasible dollars and cents wise to operate if all the monitoring requirements are done which will have to have care over many years after closure of site.

With the projected growth in Douglas and Pope Counties this site does not have enough room to handle this growth plus along with the possible clean up of two Douglas County sites being brought here. There also needs to be room for white goods, tires and a possible compst site.

Thechoosing of this site is unreal! It has all the reasons the other sites were not chsen. High water table, wet lands, very acceptable to wind and water erosion. It will be a noisy distraction to the people of Hoffman during the working operation of this facility. It will be highly visable thing to the City of Hoffman. It also has the potential to be even more visiable by expansion beyond the present plans. It will greatly alter the quality of life that the citizens of Hoffman have become accustomed to.

Sincerly:

The City Of Hoffman

*Dennis Satre*  
Dennis Satre, Mayor

DS/cp

**RECEIVED**

AUG 13 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

August 8, 1992

Kevin J. Kain, EIS Project Manager  
Minnesota Pollution Control Agency  
Environmental Analysis Office  
520 Lafayette Road North  
St. Paul, Minnesota 55155

I am very concerned with the possible health effects with the Pope-Douglas MSW Ash/Bypass Landfill.

As a Grant County Commissioner, I serve on Grant County Public Health and Mid-State Public Health. I, therefore know, Minnesota Department of Health is very concerned with lead build up in the human body. Lead keeps building up and is not excreted by the body, when it reaches a certain level many things can occur. Lead is just one of the many substances that should be tested.

I think too many questions remain unanswered in Pope-Douglas MSW Ash/Bypass Landfill testing regulations.

1. How often would testing be done?
2. Who would do the testing?
3. What is the most restrictive metal and its site life?
4. Which toxic substance may be present that is not tested?
5. Does EPA require toxic substances to be pretreated?
6. Would Pope-Douglas have their own treatment plant, if so,

who will calibrate the equipment?

7. Municipalities must run priority pollutant tests to ensure pretreatment plants are working properly, would Pope-Douglas MSW Ash/Bypass Landfill be required to do this?
8. What are the newest EPA requirements to date regarding new substances that should be added to the requirements in the future.

My Great-Grandparents homesteaded in Grant County. I want to ensure my grandchildren that Grant County will be an ideal place to carry out their heritage.

Sincerely,

*Wally Andersen*

Wally Andersen  
County Commissioner 3rd District  
Grant County, Minnesota 56248

**RECEIVED**

AUG 13 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

Kevin Kain  
MPCA Office of Environmental Analysis  
520 Lafayette Road  
St. Paul, MN 55155

RE: Pope-Douglas Landfill

Dear Mr. Kain

The EIS and the EAW follow pretty much the same lines in looking at all the problems created by this high water table, high visibility, no screen and high wind exposure site. There is the feeling that all that can be learned about the undesirable problems of this site have been brought up many times. Still the EIS uses the original proposed plan which is obsolete in 1992 and the EIS touches on a number of changes that are necessary or could be good and still we are still kicking around a 1980's design, operation closure and contingency in the EIS. What is needed as a final plan incorporating the changes and seeing that it is workable.

Why doesn't the MPCA collect and test the ash at the Pope-Douglas incinerator on a completely surprise basis several times so a more accurate determination of the true values of lead and other chemicals can be made. Yes I know the answer is MPCA has not staff and etc, to do this, in this case you have staff to drown us with 400 sheets of paper which just estimates this issue and many others. Why not gather facts instead of anticipated levels. Also in using this leachate as an ash quench you as a preparer of the EIS refuse to concede that each time the leachate makes a return to the landfill after being used as a quench it will get more heavily concentrated. Common sense certainly can see that and if you still don't believe it, run some actual tests with Pope-Douglas ash and leachate collected on a non-announced visits. Spare us the computer projections, use the real thing!

While we are at the subject of leachate, the EIS makes no provisions for treatment or even disposal or any arrangements for the roughly 2/3 of the leachate that is produced that will not be used as an ash quench. The only reference says that Fergus Falls may take a few loads, what kind of loads, a wheelbarrow, a cream can, a 2 axle truck, a 5 axle truck ??? Why doesn't Alex or Glenwood treat it at their water treatment plants, do they know something about leachate that this EIS doesn't cover? Is the overflow leachate going to end up in this proposed holding pond to be released into the Chippewa River? Along this same lines the EIS has 3 versions of the control of the runoff water from this retention pond. Pages 1-4, 3-22, and 4-12. Why?? This proves that permit application plans are incomplete, vague, and have not been updated since the original was submitted in the late 1980's. How can such a permit application be acted upon with good judgement, knowledge and fairness to the Grant County Watershed, namely the Chippewa River. Even the acreage to be used for landfill purposes is not a solid figure. We are reading 5 acres, sometimes 20 acres, The EAW seemed to be at 39 acres with white goods and tire storage besides. We have been told early that dumping site would be screened with trees, later it was a fence, later the garbage mound was projected to rise to 40 ft. above the present terrain with a prevailing NW wind exposure and at this time it appears that the litter problem will just be pretty much allowed to take its course. Now the EIS hints at future expansion, in what direction could future expansion be made? North/Private home, East/wetlands, south/private home, State Highway 27 and private home, west/Grant county, Sorry! My reasoning is that the workable area of this

80 acre site is too small.(a point I have made brought out on several previous commenys) It has a problem of high water table just like the other proposed sites that were offered, the wind exposure and therefore the litter problem could not be worse anywhere. The visibility at Hoffman, at Elk Lake, at Red Rock Lake, At Red Rock Golf course and to the 1100. vehicles per day traveling on State Hwy. 27(EIS) figures 1100 per day) and the proximity to Hwy 27 , to Hoffman city and to acres of recreational and hunting ground and still the EIS hints that an expansion would likely be asked in the future.

All these plans are covered by a bandage or a bandaid when a whole new plan must be drawn up, a site must be large enough to accomadate future expansion without future purchases.

Enclosed is a copy of a newspaper clipping of the Pope County Tribune, Glenwood, Mn., Monday July 20, 1992. Is this the kind of responsibility we can expect at the time of closure and afterward at the Solem township site in 20 years or so?

The EIS did recommend a fund for closure and a rate of set aside double the current rate but in visiting with one of the engineers at the Hoffman hearing he said that that sum also was way too low.

On page 6-3 , the EIS concludes "in summary, it appears that of the sites offered for sale, the Solem township site was the most environmentally and locationally desirable site for a landfill". Possibly it is anunfortunate choice of words, but if read as written and interpetated as read that could be a complelly false statement, because the other sites considered had little or nostudy by the preparers of the EIS. That statement questions the accuracy of the whole EIS, which I do consider a fairly well researched study. Speaking as a private citizenand an elected Supervisor of Land Township, I would recommend that this statement be removed from the record.

The selection of the Solem Township site "is discussed in section 2 of the EIS on page 2-6, the Feb.11,1986 meeting of the Board of county commissioners of Bouglas county is called a public meeting, all government meetings are public by law. It says no public comments were made in support or in opposition to the landfill application. WHY? Because no affected counties, affected townships received notification of the action to be taken at that meeting. The people were deprived of the right of notice and therefore the right to express their concern by voiceing opposition. This action on Feb. 11, 1986 certainly must border on being unethicaland possibly illegal.

Thank you for listening to my concerns,  
Gordon Larson

*Gordon Larson*

Louise Larson

*Louise Larson*

August 7, 1992

Kenia J. Kain, EIS Project Manager  
 Minnesota Pollution Control Agency  
 Environmental Analysis Agency  
 520 Lafayette Road North  
 St Paul, Minnesota 55155

**RECEIVED**  
 AUG 13 1992  
 MPCA ENVIRONMENTAL  
 ANALYSIS OFFICE

Dear Sir:

I am writing in regards to the Pope/Douglass landfill project. I would like to go on record as a strong supporter. We cannot haul our garbage out-of-state forever. As a taxpayer of Minnesota and Douglas County, I think we have already spent too much time and money on this project! This landfill needs to be allowed immediately.

Thank you for your time.

Sincerely,

Richard G. Anderson

Douglas County resident

...the cost of moving

# County appeals name in Kluver landfill closure

By Jan Ronning

The Pope County Board of Commissioners met in special session on July 15 to discuss the possible strike of 54 courthouse employees. The meeting was closed to the public and press.

The meeting was open to discuss the Minnesota Pollution Control Agency's (MPCA) order to close the Kluver Landfill in Douglas County.

Board chairman, Ralph Ranum, requested that the county join the Douglas County commissioners and the Pope-Douglas Solid Waste Board in appealing the closure order which addresses both Pope and Douglas counties as responsible parties.

No solid waste from Pope

County has been brought to the Kluver facility. The landfill, which was closed last fall, did receive ash for over three years from the solid waste incinerator, but for the past two years, the ash has been shipped out of state.

The board voted to join in the appeal which had to be made by today (July 20).

Ranum told the commissioners, "This appeal is a method of defending ourselves as Pope County has no responsibility as far as the Kluver Landfill is concerned."

## Strike

Continued from page 1A

Pope County

things

I hate to: Write letters

A perfect evening is: At home

If I had more time I would:

County,

portunities for

people

## Board

Continued from page 1A

dividers purchased to make this possible. The board agreed to the plan with a limit of \$1,000 for the dividers and other equipment.

The Glass

2A - Pope County Tribune  
Glenwood, Minn.

Monday, July 20, 1992

training programs for K-12 science teachers.

In other action the board

Enclosure - from

Gordon Larson

MPCA Environmental Analysis Office  
EIS Project Manager

Mr. Kevin Cain:

I have several concerns about the proposed Douglas\_Pope land fill.

1. The proposed site is to be drained and a liner installed below the water table. What happens if the liner leaks and water gets into the waste and ash? Also many years from now or after the site is closed who or what is going to prevent the leachate from flowing into the Chippewa river or into the City of Hoffman water supply?

2. After visiting with an incinerator employee, are the smokestack tests ever taken on days when the industrial waste from such sources such as 3M is burned or is it taken on days when they do not dump. I believe it was last year when 3M was penalized for being one of the top polluter of mercury and other elements into the atmosphere.

3. At the last EIS meeting in Hoffman it was stated that ash and raw garbage would not be allowed to be dumped on windy days you did not state at that time what the wind velocity would be to prohibit dumping. What should it be to prevent ash and materials from blowing around the countryside?

4. I feel politics played a large role in selection of this site as all drainage and leakage would leave their county and flow to the Chippewa river and into Grant county.

Therefore I feel the policing of the waste loads should be done through a committee set up Grant County, the City of Hoffman and the Townships. I recommend every load be inspected for industrial and medical waste.

5. The maximum height should be reduced from 40 feet to 30ft. above the plain of the land because of the location and wind erosion from the northwest. If trees are used for screening they will not grow tall enough to hide that ugly mound.

**RECEIVED**

AUG 14 1992

MPCA ENVIRONMENTAL  
ANALYSIS OFFICE

*Donald C. Olson*

Donald C. Olson  
Olsons Hardware Hank  
Box 276  
Hoffman, MN. 56339

RECEIVED

Hoffman, Minnesota 73

AUG 24 1992

Minnesota Pollution Control Agency,  
520 Lafayette Road North,  
St Paul, Minnesota. 55155-3898.

Dear Sirs,

I know it is too late to send in comments, but I just cannot sit by without expressing my opinions again.

I read in the "Press" published in Alexandria, Minnesota on the front page, on Friday August 14, 1992, that the landfill in Douglas County, near the town of Hoffmann has received approval from Pope and Douglas counties; the townships of La Grande, Alexandria and Mae; as well as the cities of Glenwood and Starbuck. Of course they would approve! It would be located far, far from their place! They wouldn't have to worry about their lake; drinking water for our town, like we have to.

I was at the meeting Hoffman, & I was so impressed the speeches given against having a landfill. They had done a lot that

landfill should not be located  
near Hoffman!!

I do get so upset  
about Alexandria pushing the  
landfill away from this city!  
In the St. Paul paper it was  
written "Minnewaska" by Alexandria.  
it is by Starbuck! Then it is  
advertised "Rivestone Park" by Alexandria.  
It is located near Kensington, Minnesota.  
Then the "Andes Tower Hills" (a  
ski resort) is near Alexandria.  
It is located between Kensington  
and Palmer City! Now they can  
claim the landfill - it can be  
all theirs!!! We do not want  
it by Hoffman! Something could  
happen, and we would not have  
our small town anymore! There  
must be a place in those large  
hills + unused land by Glenwood  
and Starbuck, + by Alexandria!  
If they don't worry about a landfill  
near Hoffman, then it can be  
easily built in their back yard!

Thanks for listening!

Sincerely,  
Josephine Staffanson - Boner,  
P.O. Box 283



**APPENDIX B**  
**PUBLIC MEETING TRANSCRIPT**

COPY

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MINNESOTA POLLUTION CONTROL AGENCY PUBLIC MEETING  
FOR THE DRAFT ENVIRONMENTAL IMPACT STATEMENT  
ON THE PROPOSED POPE-DOUGLAS INCINERATOR  
ASH\BYPASS LANDFILL

Reported: July 21, 1992.  
Hoffman, Minnesota.

Brenda J. Wild  
Court Reporter

BRENDA J. WILD  
2904 NORTH NOKOMIS  
ALEXANDRIA, MINNESOTA 56308  
PHONE: (612) 846-4285

1 WHEREUPON, the following proceedings were duly had: --

2  
3           ROGER WILLIAMS: I think we'll get  
4 under way. Good evening. I would like to welcome  
5 you. I guess I'm welcoming you to your own city.  
6 Welcome you to this public meeting called by the  
7 Pollution Control Agency to specifically hear your  
8 comments on the proposed Pope-Douglas Landfill and  
9 specifically on the drafting of our statement that is  
10 the third agency for this project. My name is Roger  
11 Williams. I work for the Minnesota Department of  
12 Administration and we've been asked by the agency to  
13 facilitate this meeting in a neutral way. We have no  
14 affiliation with MPCA. I'm here as a neutral. My  
15 interest is to try and run this meeting as  
16 efficiently as possible, allowing everyone who wants  
17 to speak to have an opportunity to do so. I would  
18 like to introduce the people that are in the front of  
19 the room. We'll be listening to your comments and  
20 perhaps responding to a few questions.

21           On your far right is Larry Anderson  
22 from the Rieke, Carroll, Muller Consulting firm.  
23 Larry was the project manager on the development of  
24 the Environmental Impact Statement. Next to Larry is  
25 Jeff Stevens from SEC Donohue who did the risk

1           assessment for the Environmental Impact Statement.  
2           And next to Jeff is Karen Schik who is with the  
3           Enviroscience and Prairie Assessment. In the middle  
4           is Brenda Wild who is working hard and who is a court  
5           reporter from Alexandria who will be recording all of  
6           your comments tonight for the record. From the  
7           Minnesota Pollution Control Agency is Jim Lungstrom  
8           on the far right from M P.C.A. who is project  
9           engineer. Bonnie Nelson, also a project engineer  
10          from the Pollution Control Agency and Kevin Kain who  
11          is the project manager for the Environmental Impact  
12          Statement.

13                            You have probably picked up an agenda.  
14          If you haven't, there are some by the door. We can  
15          distribute them. Basically, there are two short  
16          presentations to start with. First of all, by Dennis  
17          Nagle who is the director of the Pope-Douglas solid  
18          Waste Management Board who is going to give you a  
19          little history on the landfill itself, on the  
20          landfill proposal. And then that will be followed by  
21          a brief overview of the Impact Statement by Kevin  
22          Kain from the MPCA. At that point then the object of  
23          the meeting is to hear from you, hear what your  
24          comments might be on this proposed project. At the  
25          door or I have some, if you wish, are little pink

BRENDA J. WILD  
2904 NORTH NOKOMIS  
ALEXANDRIA, MINNESOTA 56308  
PHONE: (612) 846-4285

1 slips we would like you to fill out. That's so that  
2 we have for the record an accurate indication of who  
3 you are as you speak. And as you speak, I'll ask you  
4 to state your name and spell it and so on and so  
5 forth so we have the proper comment for the proper  
6 person. At any time during the testimony period you  
7 feel inclined to speak and you don't have a pink  
8 slip, raise your hand and someone will bring you one.  
9 We'll make it as easy for you as possible.

10 Let's begin then with Dennie Nagle. He  
11 will be giving you information on the history of the  
12 proposal. Denny?

13 DENNIS NAGLE: In 1981, Douglas County  
14 realized that the landfills in the county were  
15 rapidly running out of space. Because of the large  
16 capital costs and the requirement for long term  
17 monitoring of these types of facilities, private  
18 industry was not interested in constructing any  
19 additional solid waste facilities. But that didn't  
20 stop the garbage that continued to be generated.

21 In an effort to safely manage the ever  
22 increasing waste stream, because of the economic  
23 scale, the Pope-Douglas Solid Waste Management Board  
24 was formed. The purpose of this joint powers board  
25 was to manage the waste system that is produced in

1 our two county area. Since the Pope-Douglas Board  
2 was formed, they have become the owners and operators  
3 of the Waste Energy Plant located in Alexandria.  
4 They have implemented an ever growing recycling  
5 program and a permanent household hazard waste  
6 facility will be completed in just a few weeks.

7 These programs are designed and  
8 operated to reduce the amount of waste that is  
9 generated and to reduce the toxicity of that waste.  
10 But even after all of this, there's still a need for  
11 a small landfill. Currently we are shipping the ten  
12 to fifteen percent ash that's left over after the  
13 burning process to a landfill in Wisconsin. The  
14 waste that cannot be burned is being shipped to a  
15 landfill in North Dakota. Well, this system seems to  
16 be working today, but the Pope-Douglas Board knows  
17 that other states are not going to continue to accept  
18 Minnesota waste.

19 The Pope-Douglas Board also knows that  
20 we must be responsible for our own waste. And to do  
21 that, we must have an integrated solid waste  
22 management system. A landfill will always be  
23 necessary and an important part of this system and it  
24 is because of that serious need that we are here  
25 tonight.

BRENDA J. WILD  
2904 NORTH NOKOMIS  
ALEXANDRIA, MINNESOTA 56308  
PHONE: (612) 846-4285



1 approved that scoping document in November of 1990.  
2 The draft EIS was noted in the Environmental Equality  
3 Board Monitor on June 22nd 1992, and thus beginning  
4 the public comment period.

5 That's what brings us here tonight, is  
6 that public comment meeting for the draft of the  
7 Environmental Impact Statement. The handout that you  
8 picked up at the door has a little window in the  
9 bottom left hand corner that has a schedule on it. I  
10 would like to go over that a little bit and what I  
11 see coming up as far as timing goes on this  
12 environmental process. The public comment period  
13 ends on August 5th. And written comments will be  
14 taken up until August 5th. I hope to go in front of  
15 the Solid Waste Committee of the M P.C.A. Citizen  
16 Board on August 24, 1992. What I will do there is  
17 bring them up to date on the Environmental Impact  
18 Statement, where we are in the process, and summarize  
19 issues and concerns that we received during the  
20 public comment period. If any of -- you all will be  
21 notified of that meeting. If you would like to come  
22 down, you certainly can to comment to the Citizens  
23 Board during their next meeting. But you will be  
24 noticed in advance of that.

25 The final EIS we're hoping to complete

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1 and release sometime in September. And, again, once  
2 the final EIS is out, you will have an opportunity,  
3 if you wish, to send in final written comments on the  
4 final and to me.

5 What I'm hoping to do is in October is  
6 to go in front of our Citizen Board for a decision  
7 and that is to determine -- the Board determines the  
8 Environmental Impact Statement, addresses the issues  
9 that were raised in the scoping document. If the  
10 Board decides that it does and determines that the  
11 Environmental Impact Statement is an adequate  
12 document, then the whole process moves over into the  
13 permitting process. And, again, there will be many  
14 opportunities for you to comment and interact during  
15 that permitting process.

16 Just to read -- just to remention  
17 again, everybody that is on the mailing list, they  
18 have a copy of the draft of the Environmental Impact  
19 Statement. You will receive any notices of my  
20 appearances in front of the Board with the drafting  
21 of the EIS. So, you will be given an opportunity to  
22 come in and testify if you wish at that time. Thank  
23 you again for coming and I'm looking forward to  
24 hearing your comments.

25 ROGER WILLIAMS: Okay. Now, it's your

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1 turn. Looks like the back row is used to watching  
2 basketball games. They are setting up high to see.  
3 But this isn't a spectators sport. So, I hope all of  
4 you find your way down here to let the staff know  
5 what's on your mind. Does anyone not have a pink  
6 slip? Who would like one at this time? If you do at  
7 any time, if you feel like speaking, please raise  
8 your hand and we'll get one to you. I have a few  
9 slips here. I'll call names at random. We ask that  
10 you summarize your comments as best you can in five  
11 minutes or so. If you take a little longer, it's no  
12 big deal. But we do want to make sure that everyone  
13 who wants to speak has a chance to do so. If there's  
14 time left over and no other speakers, somebody else  
15 still has something to say, we can call on you again.  
16 When you -- when I call your name, I would like you  
17 to come to either of the two microphones. I would  
18 like you to state your name, first name, last name,  
19 and I would like you to spell your last name for the  
20 benefit of the court reporter. That way again we can  
21 make sure that the right name goes with the right  
22 comment. Gordon Larson is the first speaker.

23 GORDON LARSON: It's tough to be the  
24 first guy. My name is Gordon Larson. It's spelled  
25 the old Swede way, L-A-R-S-O-N. And I'm on the Board

1 of Supervisors of Land Township. I guess that  
2 explains my part of my interest and I do have a  
3 personal interest both in the Community of Hoffman  
4 and a selfish interest as a farmer whose land is on  
5 the Chippewa River. I guess I have a question about  
6 this siting process. I believe the address that was  
7 given first left out one detail, if I'm correct. And  
8 that detail is -- I was led to believe that this  
9 landfill was pursued by a private party first. Is  
10 that correct? Mr. Nagle, would you care to answer  
11 that?

12 ROGER WILLIAMS: I need to emphasize  
13 something. This is not a meeting of the county. And  
14 the county was responsible for siting the facility.  
15 This is a meeting of the Pollution Control Agency  
16 whose job is to measure the environmental impact of  
17 the site that has been selected by the county. Staff  
18 cannot respond to questions about how it happened to  
19 select the site.

20 GORDON LARSON: Why is it in the book?

21 ROGER WILLIAMS: Kevin, do you want to  
22 respond to that?

23 KEVIN KAIN: One of the questions that  
24 came up in the scoping of the document was the  
25 question of how the site was selected. And when we

1 went through the records of meetings and of the  
2 county and went through the process of site  
3 selection, that's where they described in the book.  
4 If you think it was error or something was missing,  
5 that's what we need to hear about and if we need to  
6 go back and look, that's the kind of things we need  
7 to know.

8 GORDON LARSON: I guess I didn't  
9 include that in written comment because I have read  
10 the EAW and this thing and it's in my spare time and  
11 I just can't pick out where I saw it. I have another  
12 question. When you get back to the M P.C.A.,  
13 procedure on sighting. I was -- I understood that  
14 when a site was being pursued, another one should  
15 also be available as a backup. And here again,  
16 where's that backup? I guess I'll let someone else  
17 talk for now. If I may pursue another subject later,  
18 is that permissible?

19 ROGER WILLIAMS: Sure. Thank you, Mr.  
20 Larson.

21 ROGER ANDERSON: Roger Anderson.

22 ROGER WILLIAMS: Roger Anderson.

23 ROGER ANDERSON: My name is Roger  
24 Anderson, A-N-D-E-R-S-O-N. Do you mind if I would  
25 like to use that mike?



1 We're paying the bill for that.

2 I would like to see our comment period  
3 extended. They have engineers and P.C.A. has worked  
4 probably a year and a half on the Environmental  
5 Impact Statement. We have had less than a month, for  
6 us to digest something this big is beyond my  
7 comprehension, for us to hire somebody and have them  
8 take a look after we're through is pretty impossible  
9 to get it done in over a month. I would appreciate  
10 having our comment period extended.

11 The size of the site has been changed  
12 many times. It started out, the original size, cell  
13 size, it's been five acres; it's been twenty acres;  
14 it's been thirty-nine acres. I think it's back to  
15 twenty acres now. I'm not sure, but I believe that's  
16 right. The EIS is based upon the preliminary  
17 deciding of the site. It's pretty hard for us to  
18 digest or base our arguments upon a plan that is not  
19 a final plan. These are preliminary plans all having  
20 been given to us and I think the EIS needs to be  
21 based upon a final plan.

22 It's unclear how the surface water is  
23 going to be controlled in the EIS, I believe. We  
24 have a number of statements there, but that's just  
25 one statement I want to make. The base of this

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1 landfill will be constructed below the water table.  
2 We know the other sites were not pursued because of  
3 their ground water and yet this site was pursued with  
4 the first water table. This water table has to be  
5 drained in order for the site to be constructed.  
6 They're going to dig down in this hill forty foot and  
7 have to drain that water off this side hill before  
8 they can pursue this landfill site.

9 The question is, have any of the  
10 landfills in the state been constructed with the  
11 first water table? The other thing is, how long will  
12 this drainage of this first water table be? How long  
13 will it last? Will it last indefinitely or is there  
14 a time period after the close of this site. If this  
15 wash table is allowed to rise after the close, will  
16 this waste become contaminated? I guess I asked how  
17 long the watering system be, okay. Will there be  
18 funds set aside to take care of this? The membrane,  
19 I believe, there's -- I don't know if there's a site  
20 in the state that has used a membrane yet. Will this  
21 be compatible with a perched water fill? Membranes  
22 are made to hold the water above the membrane, yet  
23 here in this first water table we have water pushing  
24 up against the membrane. What effect will that have  
25 on the landfill?

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1                   The list of chemicals do not include  
2                   lead. What wasn't lead included? How long is this  
3                   leaching check system going to be operated? Will  
4                   that be stopped when it's closure or will that be  
5                   going on indefinitely? What effect does the landfill  
6                   have on our property values? I think it's stated  
7                   that they really don't know and I think that needs to  
8                   be looked at more carefully.

9                   I'm not sure what more I should say. I  
10                  tried to cover my thoughts. Some of the things that  
11                  haven't been covered in the EIS I think are the  
12                  industrial waste, the hazards waste, the visibility.  
13                  I guess if you look at this landfill site that is  
14                  going to be dug out in forty foot in the ground, it's  
15                  going to end up forty foot in the air. When it's  
16                  done it's going to be eighty foot deep. We're going  
17                  to have a forty foot hill out there when it's done on  
18                  flat land. This site will be visible from down the  
19                  road, it will be visible from the town of Hoffman, it  
20                  can visible from the Red Rock Golf Course Road and  
21                  from Highway 27. It's about twelve hundred foot from  
22                  Highway 27 and we will see that site for the rest of  
23                  our lives most of us. You're talking about this  
24                  landfill to last thirty years, plus they already have  
25                  plans for opening east on that same property when

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1 this one is finished, maybe making another landfill  
2 on the same property. So, do we want to look at that  
3 for the rest of our lives and for our kids and maybe  
4 our grandkids? I think it will be a big detriment to  
5 the City of Hoffman. People going back and forth to  
6 work every day are going to see this landfill and  
7 this raw garbage. I'm going to see it every day.  
8 People of Hoffman can look out their bedroom windows  
9 and see this garbage. People out in the golf course  
10 golfing are going to see this garbage. People going  
11 fishing from other towns that are putting the biggest  
12 share of this garbage out there. And I think that  
13 needs to be taken into consideration. I guess that's  
14 all the concerns I can think of at the moment. I  
15 thank you.

16 DENNIS SATRE: Dennis Satre, S-A-T-R-E.  
17 I think Roger probably covered some of this, but I  
18 would like to see the final plans of this landfill so  
19 it would be easier for us to make a comment on it.  
20 And it's just about impossible to go from there on  
21 it. I also have the same question about does other  
22 landfills in the State of Minnesota that have been  
23 put in the water table like this and compared to the  
24 one that is in a dry situation? And there seems to  
25 be an awful lot of lack of information on the Alex

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1 ash and I think this should be addressed. And also a  
2 question I had was on the settlement and the final  
3 foreclosure, what's going to happen over the next  
4 thirty, forty years after it's closed? Is there  
5 going to be a lot of settlement? I don't think that  
6 was quite addressed. I guess that's about all I have  
7 for the time being anyway.

8 ROGER WILLIAMS: Thank you. I've  
9 called on everyone that has submitted slips. Are  
10 there others? Certainly there are others who wish to  
11 speak. Christine Spaulding?

12 CHRISTINE SPAULDING: Christine  
13 Spaulding, S-P-A-U-L-D-I-N-G. Although we do not  
14 live close to the proposed site for the landfill, we  
15 live west of Hoffman Land Township. Some concerns  
16 not having studied the statement here that I do have  
17 in paging through it very, very quickly have to do  
18 with the environmental impact. I noticed one of the  
19 things had to deal with endangered species, wildlife  
20 that may be here, plant life and so forth. What I  
21 failed to find was what about species that are not  
22 endangered. I'm talking more along the line of pest  
23 control. Anytime you have a pest control, there's  
24 dealing with rats, rodents, other kinds of things  
25 such as that and also the potential for other plant

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1 life. And I think that should be addressed very  
2 clearly. That would be a concern.

3 Another thing is having to do with the  
4 water studies, ground water in particular. It was  
5 based on known elements, things that are known at  
6 this time and the impact -- would be impact as far as  
7 runoff is concerned, probably not as far as the  
8 ground water is concerned. I think back to a few  
9 years ago with the toxic waste that were being buried  
10 with very little control. Based on known elements at  
11 the time, that seemed to be the thing to do. I think  
12 we have to really consider this because I think there  
13 are elements all the time that are creeping up that  
14 we don't know about. Roger, for example, mentioned  
15 land being a part of it, Roger, Dennis, and I think  
16 there are other elements that have to be considered.  
17 And to say there is not going to be reaching the  
18 impact, I think is pretty premature.

19 ROGER WILLIAMS: Thank you. Others who  
20 have comments? Mr. Larson, did you want to make any  
21 more comments?

22 GORDON LARSON: Gordon Larson, Land  
23 Township. I hadn't located a page, but there is  
24 mention made of expansion in the future. Is this  
25 part of the plan at this point? I think we ought to

1 know that. It isn't acknowledged in the book. I  
2 don't have the page. But I think that should be part  
3 of the permitting process because it's already been  
4 discussed at different times. They've asked for five  
5 acres, they've asked for twenty acres, they asked for  
6 thirty-nine acres and in the EAW now we're back to  
7 twenty. Which is it? That was addressed on  
8 number -- page number 4-50. And it's Financial  
9 Assurance. It goes onto say that it's been studied  
10 and all this and that. And the comment is made that  
11 the financial obligation of the Solid Waste Board  
12 should be seventeen thousand six hundred and  
13 fifty-one dollars per month. And it's approximately  
14 eight thousand nine hundred and forty-two dollars  
15 that was calculated by the Solid Waste Board. This  
16 is about twice. Does that have a bearing on planning  
17 for permitting or not permitting? And it does give a  
18 table on here of how this was arrived at.

19 And then of course we have got that old  
20 problem of leaching. Everybody loves leaching. We  
21 get all kinds of comments about leaching. We've been  
22 told that it's very toxic. But some persons say it's  
23 not so bad. We had a man make a statement that it  
24 was fit to drink, but when he was asked if he would  
25 drink it, he had to back down. And he was an

1 employee of the State of Minnesota. So, we know that  
2 it's not harmless. Pope-Douglas has had their own  
3 problems of leaching. I had read minutes of their  
4 board meetings, and neither Glenwood or Alex waste  
5 water treatments will agree to accept this leaching  
6 to treat it as such. One person on these discussions  
7 made the comment, "it's a hot potato" and I think it  
8 is. It's an understatement. There's no  
9 firm -- there's no firm declaration in this book  
10 about what we could with leaching. They say they're  
11 trying to use ash, but you can't use it all. What do  
12 you do with the overflow? There was one mention made  
13 of providing treatment on the grounds. I assume that  
14 means the site if it is permitted. And, again, I  
15 can't find the exact page, but it said something  
16 about Fergus Falls thought they would take a few  
17 loads. One of the things we asked for when this EIS  
18 was called for was a firm commitment or firm  
19 contract, a firm idea of who does the leaching, who  
20 takes care of it. We need a contract on that. Not  
21 just hearsay. Well, maybe Fergus will take a few  
22 loads, maybe they would to send a few loads back,  
23 too. Did you ever think of that? I guess that's all  
24 I have to say right now. Thank you.

25 ROGER WILLIAMS: Thank you, Mr. Larson.

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1 KEN JOHNSON: Ken Johnson,  
2 J-O-H-N-S-O-N. Hoffman City Council. I received  
3 drafting of the Environmental Impact Statement. I  
4 was looking at 2-1, I guess, comments I want to make  
5 on that. The first asked "if the Solid Waste Board  
6 was to contain an engineering firm to prepare a solid  
7 waste management study in two counties, Douglas and  
8 Pope and a Solid Waste Management Plan platted was  
9 submitted to and accepted by M.P.C.A. The Solid  
10 Waste Management recommended that an ash/bypass  
11 landfill be constructed for Pope and Douglas Counties  
12 and established the following criteria for potential  
13 landfill site search areas in the two counties. 1.  
14 Designated setback of the landfill plus a buffer to  
15 those setbacks from waters such as lakes and  
16 streams." Another one, "avoidance of wetlands and  
17 provide a buffer to wetlands". Another one,  
18 "avoidance of peat soils". Another one, "avoidance  
19 of unsuitable hydrogeology or areas where groundwater  
20 is too easily impacted".

21 And I go to the back here, page 6-1,  
22 there was a section on "Alternate Disposal Methods",  
23 and in this process, I thought it was kind of  
24 interesting because it said "Pope-Douglas Solid Waste  
25 chose to pursue "volunteer" sites for the proposed

1 landfill as opposed to pursuing a site acquired  
2 through an eminent domain condemnation lawsuit. The  
3 Solid Waste Board placed advertisements in the  
4 newspapers and seventeen sites were offered for sale.  
5 The Solid Waste Board reviewed the suitability of the  
6 sites according to a set of environmental siting  
7 criteria which they developed. They also reviewed  
8 the sites. Of the seventeen sites offered for sale,  
9 fourteen sites were determined environmentally or  
10 locationally unacceptable."

11 You go down another paragraph, The  
12 Solem Township site met all the siting criteria  
13 except one. The site is closer to wetlands than a  
14 selfimposed setback criteria called for. The county  
15 waived this requirement because this criteria was a  
16 voluntary guideline instead of a mandated legal  
17 requirement." And I guess that would be my one  
18 question; what's the difference? What is a voluntary  
19 guideline and what is mandated requirement? "One  
20 criterium often used in a siting activity, which is  
21 not used by the Solid Waste Board, is aesthetics and  
22 site visibility. The Solem Township site will be  
23 visible from quite far distances, including the City  
24 of Hoffman."

25 On the bottom here, "The Solem Township

1 Board and the public who live in the area of the  
2 proposed landfill, including the public from the City  
3 of Hoffman, opposed the issuance of a permit for  
4 landfill for the landfill. The county officials  
5 determined that none of the testimony presented  
6 reasons for rejection of the site. Thus, they  
7 granted the conditional use permit. If the Solid  
8 Waste Board chose to secure a site through  
9 condemnation, it is likely they could find equally  
10 environmentally or locationally suitable. It would  
11 likely be at least, and possibly more socially  
12 controversial as the Solem Township site."

13 And one thing that always stuck in my  
14 mind is that Gary Gilbert said that pollution control  
15 is not involved in the siting process. And I think  
16 that's true. But my question is, if you accepted the  
17 plan, based on criteria, and furthermore, accepted  
18 criteria for this site which is different, and you  
19 have the right -- or the county had the right through  
20 eminent domain to come up with the site, which is  
21 socially and environmentally more suitable, then  
22 truly you were involved in the siting process and I  
23 feel this criteria needs to be addressed.

24 ROGER WILLIAMS: Thank you for your  
25 comments. Others who wish to speak on the comments

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1 on the proposal?

2 JOEL LEVIE: I'm from Evansville. I  
3 have a comment. L-E-V-I-E. I would say that before  
4 a permit is issued, there should be -- perhaps this  
5 has already been included. I haven't had a chance to  
6 read the full two hundred page document, I may be  
7 running on an assumption, that no ash be accepted  
8 which is generated from outside the Pope or Douglas  
9 County area. That's just a -- I would hate to see  
10 ten years down the road for economic reasons we are  
11 going to start accepting more ash. That would be a  
12 serious mistake, that the facility be used only for  
13 Pope and Douglas County area. Ash that comes to us  
14 as a result from the materials generated in those two  
15 counties. There should be funding for clean up that  
16 should something mess up, should something  
17 catastrophic happen that the two counties have a  
18 significant fund that would be instituted prior to  
19 any digging or excavation or beginning of the project  
20 for clean up. I don't know what kind of numbers  
21 we're talking about, millions of dollars, whatever is  
22 necessary to clean up to protect this town and this  
23 area. That there be insurance for any health  
24 liabilities that occur. The report does say that  
25 there are two point three percent hundred million and

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1 nine point one per hundred million chances. I'm a  
2 believer in statistics. You're probably right.  
3 Somebody might come in and have a cancer related  
4 formality. There's other things. There's poisoning  
5 due to metals. Remember, you can get nervous  
6 disorders. I don't know if these things were  
7 statistically approved and treated in the study.  
8 There's a whole array of things that can occur as a  
9 result of hazardous, these kinds of hazardous  
10 environmental activities. And there should be  
11 adequate health insurance that the county -- the two  
12 counties have to cover anything that might come up.

13 The other thing is there should be a  
14 board that would be convened from the very beginning  
15 to review cases of things like this. I think of  
16 Agent Orange and nuclear workers. They make claims  
17 their illnesses were due to exposure to Agent Orange.  
18 Some of them still haven't been compensated.  
19 Somebody is going to come up in and say, here, this  
20 my headache or my -- the loss of my child is as a  
21 result of contaminants I received drinking water that  
22 came -- that was contaminated by this project.  
23 You're going to say or -- it's very likely they'll be  
24 told to take a walk because you can't prove it.  
25 There's got to be some kind of simple streamline

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1 vehicle for people to get compensation if there is a  
2 breakdown or failure of some sort.

3 Over the next thirty years, that's the  
4 disposal life time of this that sources of the  
5 generation of non-recyclables be reduced to zero so  
6 we don't have to build another one of these things.  
7 This is some serious stuff we're talking about.  
8 We're using the grocery stores in Alexandria and  
9 garbage that we buy there and the packaging of all  
10 sorts of different forms. There's either got to be  
11 serious costs attached to that for the risk that  
12 we're taking in creating the site, whether it's some  
13 kind of tax or some kind of fee or something that the  
14 waste management, Pope-Douglas County would have to  
15 take care of that so the production of ash is reduced  
16 and there is no ash at the end of thirty years trying  
17 to go through the recycling thing again. It's all  
18 recyclable or else it doesn't come into the county  
19 and go for Target or Pamida or whatever. No more  
20 garbage coming in and we don't have to worry about  
21 this stuff and having to drink it and read it.

22 The other thing is a suggestion of  
23 something that occurred right now is that apparently  
24 I understand there's no representation from Grant  
25 County on this Board, on the Douglas County, Pope

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1 County Waste Management Board that I think out of  
2 good faith there ought to be some kind of -- some  
3 moral reason perhaps that they should appoint or  
4 maybe go through some kind of process to get  
5 representatives from this area -- from Grant County,  
6 the ones who are closely affected. Some kind of  
7 representation from Hoffman onto that Board so that  
8 they have some say, some control over their health  
9 and their environmental destiny. That just about  
10 covers it. Otherwise, you guys are doing a great  
11 job.

12 ROGER WILLIAMS: Thank you. Any other  
13 comments? Others? Anyone need a slip?

14 A VOICE: Explain what leaching is.  
15 I'm sure half of the people or more here do not know  
16 what leaching is. I would think maybe you could do a  
17 little better job explaining. One of the guys talked  
18 about only ash from Douglas County. What you don't  
19 know is we're already getting garbage from other  
20 garbages. Last Winter we imported raw garbage from  
21 Stearns County to keep our incinerator going. I  
22 would certainly like to include in this permit that  
23 we do not accept from other counties if this landfill  
24 is proposed. The permits aren't granted unless they  
25 are needed. Evidently this landfill started with

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1 ash. It was the first thing that it went to ash and  
2 raw garbage and then it went to white goods and  
3 tires. Who knows where it's going to go next.  
4 Hoover landfill is full. They don't know what to do  
5 with it. They've got excess ash there now. I'm  
6 afraid if this landfill is sited, I know where the  
7 first ash is going to come from. What I would like  
8 in this permit is we do not allow ash from other  
9 landfill sites or garbage from other landfill sites  
10 to come to this landfill site. Thank you.

11 ROGER WILLIAMS: Thank you again. Any  
12 other comments. Kevin, do you or your staff wish to  
13 respond to any of the questions that have been asked  
14 so far? It seems like comments are sort of dying  
15 down. Perhaps if you answer a few questions people  
16 might have additional comments.

17 KEVIN KAIN: The technical staff can  
18 correct me if I am in error, but leaching is caused  
19 or comes about when ground water our surface water  
20 comes in contact, in this case, with either the  
21 municipal solid waste or the ash and then filters  
22 through that and is either collected in the leaching  
23 checks system, which is designed to collect that or  
24 if it should get into ground water or into the soil.  
25 It's the material from the water that passes through

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1 the waste and thus becomes leaching.

2 I would like to respond to some of the  
3 questions and if I miss some, I would be glad to pick  
4 up on it again. I'm just kind of going through my  
5 notes. Roger asked about extension on the comment  
6 period. I'm going to be looking at that when I get  
7 back to see how it fits back. We did extend it an  
8 extra ten days to the normal thirty day public period  
9 that's required, but we'll see if that can be  
10 extended a little longer on that.

11 You had made a comment about what lead  
12 was looked at in the EIS. Lead was looked at. We  
13 did looked at that. Dr. Stevens has done a number of  
14 list assessments. Lead has not been a problem that  
15 has shown up in landfills in ash or the MSW. It was  
16 looked at, but it was not found to be a problem.  
17 That's why you didn't see it in there. The Health  
18 Department asked about that early on so it was  
19 specifically looked at. We did address that in there  
20 too saying we did look at it but didn't find  
21 anything.

22 There are a number of questions that  
23 came up about final design plans for the project.  
24 Right now the environmental review process looks at  
25 the project as it's progressed as we get it from the

1 proposer; in this case, Pope-Douglas. It's a type of  
2 a system where we can identify things in the project  
3 that need correction or make suggestions that might  
4 help the facility operate better or safer and those  
5 can be incorporated into the changes as it goes  
6 through the permitting process. The permitting  
7 process starts the specifics of the project, the  
8 design, how it will operate. That will come out in  
9 the permitting process. And you will have an  
10 opportunity to review the graph permit. I asked that  
11 there be a type of a document comment on it and  
12 comments specifically on design and on operations.  
13 So, you will have that opportunity as it moves  
14 through the permit process.

15 Some of the questions about the first  
16 water table and the leachage collection system; how  
17 will it need to operate? They will both need to  
18 operate as long as the landfill is there. And that's  
19 something we looked at in the draft.

20 A VOICE: A question on that. Who is  
21 going to be operating it for eternity, let's say?  
22 It's going to be operating as long as it's there.

23 KEVIN KAIN: It will be the  
24 responsibility of the Solid Waste Board and it would  
25 be a permit conditioned that would be spelled out

1 specifically and also including monitor requirements;  
2 how often and check the system for operation  
3 integrity and that type of thing.

4 On the issue of financial assurance,  
5 that was raised. As part of the permit requirements,  
6 the facility will have to meet financial insurance  
7 requirements. And the concerns that you have raised  
8 are concerns that we have also. We want to make sure  
9 that the facility, even after it closes, that it is  
10 maintained and kept in good operating condition. And  
11 that's something we looked at very closely and those  
12 costs are figured in and it's a requirement that the  
13 county will need to meet as far as a permit.

14 I don't know if anybody has anything  
15 they would like to respond to, they have notes on.  
16 We've covered a lot of material. And one thing, I  
17 would like to take this opportunity to say is that  
18 your involvement in this process, not only here, but  
19 before and months to come are very important. Any  
20 time you have public involvement with the projects  
21 are better because of it. And written comments, if  
22 you comment tonight or just send in a written letter  
23 to support the system to make it work. And if you  
24 would like to maybe ask some more questions we would  
25 be glad to try to respond to them.

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1                   BOB JOHNSON: J-O-H-N-S-O-N. The  
2 question has to do with a comment about screening for  
3 this site. And how -- what will be done as far as  
4 the screening and how good is the M.P.C.A. in regard  
5 to our view out here permitting or considering  
6 permitting something that is forty foot above our  
7 local elevation out there? How will you screen  
8 something like that?

9                   KEVIN KAIN: The screening issue is  
10 something that we identified during our review. That  
11 needs to be -- the county will need to look at it  
12 more thoroughly because it didn't have quite as much  
13 in it as we thought it would be necessary. There are  
14 a number of screening techniques that are available.  
15 We'll be making some recommendations, you know.  
16 There might be some tree concerns, some kinds of  
17 trees of varying heights to allow some screening.  
18 There are some alternatives. Larry might be able to  
19 cover some of those, but those would be some  
20 recommendations that we'll be putting to the permit  
21 people that will be included in the permit.

22                   LARRY ANDERSON: My name is Larry  
23 Anderson and I work with the consulting engineering  
24 firm of Rieke, Carroll and Muller, Associates. On my  
25 right here is Jeff Stevens who also worked on this

1 Environmental Impact Statement with me and also Karen  
2 Schik. The reason we were hired was really to second  
3 guess everything that the Solid Waste Board did.  
4 That was my job. They did a good job. But as far as  
5 the issue here of screening, that's one thing that we  
6 discovered as we read through what had been done.  
7 They did not really address the issue how the  
8 landfill would be screened and some of the previous  
9 meetings they indicated that it would be, but the  
10 documents that we put together didn't show any  
11 screening.

12 So, one thing we identified is that,  
13 first of all, it will be somewhat difficult because  
14 it will stand up above the natural terrain. There  
15 are ways that it can be screened. It costs money.  
16 They will have to plant some trees, tall trees, like  
17 poplar. That's perhaps the most common way of  
18 screening land sites.

19 ROGER WILLIAMS: Miss Spaulding I think  
20 had a question about plants and varmint control.

21 LARRY ANDERSON: Varmint control I  
22 would say also was a concern. We did address the  
23 issue. Also the Solid Waste Board proposed or  
24 addressed the issue to the extent possible. The  
25 varmint control is kind of a nebulous thing in some

1 ways in that there's only -- it's not really -- you  
2 can't really put a finger on it because by  
3 definition, a landfill won't have rats. That's the  
4 definition of landfill. In fact, that's why we've  
5 gone to -- as a means we've gone to burying our  
6 garbage so we don't have rats. But yet we know  
7 there's a possibility that rats might somehow get out  
8 there. So, to control that the waste must be covered  
9 on a daily basis. That's the primary concern that  
10 neighbors always would have for varmints would be a  
11 rat.

12 Other things that might be present  
13 would be perhaps an insect of different types.  
14 Insects birth rate is where water stands, where  
15 garbage is allowed to stand and that sort of thing.  
16 Again, that is controlled by daily covering the waste  
17 and providing good management practices. My job as  
18 part of this Environmental Impact Statement was to  
19 review whether the plans that the Solid Waste Board  
20 had presented followed the state of the art. And  
21 what I've seen in general, that's what we have done.  
22 They have essentially proposed to do the things that  
23 are accepted practices for control of these kinds of  
24 animals.

25 KEVIN KAIN: I would like to make a

1 statement. The Environmental Impact Statement by  
2 design is to take a very critical view, very critical  
3 look at the proposal. And it's to identify areas in  
4 the proposal that need change or need upgrading and  
5 maybe identify potential problems with that  
6 particular design. And what will happen when we're  
7 done, those changes or problems that we've  
8 identified, we pass on through our permitting  
9 process, with recommendations, things that we think  
10 should be done or could be done and those can be  
11 incorporated into the project proposal to correct  
12 those and minimize any of those problems that we may  
13 have identified. So, the Impact Statement is to  
14 raise questions. It is to identify those things that  
15 maybe need more work, maybe need some additional  
16 screening, whatever it might be and like I mentioned  
17 before, things as you read through it, things that  
18 you identify that need to be looked at further, we  
19 need to hear about it.

20 ROGER WILLIAMS: Is it not true the  
21 questions asked, questions that were raised tonight  
22 will be incorporated into the final EIS?

23 KEVIN KAIN: That is correct. All the  
24 comments that are referred to here tonight and  
25 anything you sent in will be responded to and will be

1 part of the final Environmental Impact Statement when  
2 it is sent out and you'll have an opportunity to, at  
3 that point, to review it as far as comments and  
4 questions.

5 ROGER WILLIAMS: Tell us who you are and  
6 where you are from.

7 STEVE ELLIS: Steve Ellis from Barrett.  
8 E-L-L-I-S. My question is if there's not going to be  
9 screening for visibility. I understand that the --  
10 the question I ask is how about wind blowing for  
11 neighbors and things like that. This is ash and this  
12 can be picked up in the wind and the answer I got, it  
13 was going to be quenched, this was going to have  
14 water put on it. In the Winter are they going to go  
15 dumping off ice blocks? This is a very opened  
16 exposed site. We get very strong prevailing winds  
17 that roar right through there and by the nature of  
18 the incinerator ash it can be easily airborne. I  
19 wonder if that has been looked into.

20 KEVIN KAIN: Yes, it has been looked  
21 into. First of all, there will be some screening at  
22 the site. There will a requirement that we'll have  
23 in the permit. Secondly of all, the ash that does  
24 come out to the site, it is wet year round. It has,  
25 I don't remember exactly what the moisture content

1 is, but it's wet.

2 STEVE ELLIS: At thirty below it's  
3 coming out wet?

4 KEVIN KAIN: As it's loaded into the  
5 truck because of volume, as I understand it, because  
6 of the volume of the ash of that they're hauling --

7 STEVE ELLIS: I mean, that doesn't make  
8 sense. You're not hauling it out wet at thirty  
9 below.

10 KEVIN KAIN: It's something I can look  
11 at dealing with that specific temperature.

12 STEVE ELLIS: Because it's just as  
13 windy in the Summer as it is in the Winter; maybe  
14 even more.

15 STAN STARK: My name is Stan Stark,  
16 S-T-A-R-K. I have a question for the panel. How  
17 many of you have actually been to the site? Have all  
18 of you been out there? What kind of day was it when  
19 you were out there? I mean, was it wintertime when  
20 it was calm or was it windy or what? I guarantee if  
21 you go and stand on that hill or any other hill  
22 around this community at least half of the days out  
23 of the year, you're pret'ner blown away. I'm not  
24 joking. And I've seen firsthand a landfill down  
25 Morris which isn't too far away, garbage blown all

1 over the place. I was there because my kids were  
2 part of a community pride project for 4-H and they  
3 were there to help clean the place up. Now,  
4 somebody, whoever was responsible for that landfill  
5 or the Pollution Control Agency was sleeping on the  
6 job because it was a mess. And I would just like to  
7 say that I don't care what kind of screening you're  
8 going to end up with out here, you're going to have  
9 garbage blowing all over the place. And I guess one  
10 other comment I would like to make, too, is that I  
11 feel that the public comment period should be  
12 extended. It's taken well over a year to put  
13 together this book. We obviously need more time than  
14 just a month or two to put together our thoughts on  
15 it.

16 ROGER WILLIAMS: Thank you. Other  
17 comments or questions? So everybody can hear, just  
18 take a minute and come down and use the microphone.

19 ALLEN ANDERSON: A-N-D-E-R-S-O-N. How  
20 about twenty years from now when kids can't get radio  
21 and T.V. because of this forty foot hill? What are  
22 they going to do; build a sixty foot tower to get  
23 T.V. and reception? That is going to be looked into.  
24 How many acres of watershed is there on the property?  
25 Where is this water going to go now that it's not

1 going to be going into the landfill. Thank you.

2 ROGER WILLIAMS: Thank you.

3 DENNIS SATRE: I have a follow-up on  
4 Stan's question here. It's in the book. It's the  
5 statement that said that operation of the  
6 landfill would stop immediately if it becomes too  
7 windy. Is there a plan to determine when it's too  
8 windy?

9 KEVIN KAIN: That's a very good  
10 question. That would be -- probably it would be a  
11 permit issue, a determination of the wind velocity.  
12 That would be something being addressed specifically  
13 in the permit.

14 ROGER WILLIAMS: Other comments or  
15 questions?

16 ROGER ANDERSON: Roger Anderson again.  
17 Kevin, you mentioned that you're going to be able to  
18 screen this site. I was going to bring up the point,  
19 too. How can you screen prevailing winds out there?  
20 The wind is northwest. How do you intend to screen  
21 from the prevailing wind? I don't understand how you  
22 can do it because there's no way that you can build a  
23 screen a hundred feet high or whatever it's going to  
24 take or more. How do you intend to do that? How can  
25 you answer that? And I can tell you how windy it is.

1 I've lived there all my life.

2 ROGER WILLIAMS: Other questions or  
3 comments?

4 GORDON LARSON. Gordon Larson. I guess  
5 we're on this wind issue right now and three days  
6 probably would be extensive wind, would it? What  
7 happens after that? Everybody is fill of snow. If  
8 you've ever been a farmer and had to pitch snow you  
9 know what a snowstorm can do to you. You spend more  
10 time digging out the snow than actually feeding  
11 silage. I look at a landfill much the same way. We  
12 do have storms, we do have blizzards, we do have snow  
13 in this county, although we haven't had it in the  
14 last five years. So much for that.

15 On page 3-10 and 3-11, there's  
16 Ash\Bypass Permits and Approvals. And I won't go  
17 through them, but it lists the various agencies and I  
18 find two agencies that are controlled by the  
19 Minnesota Wetland Act of 1991. And one is the  
20 Douglas County Board of Soil and Water Resources, the  
21 other one is Grant County Board of Soil and Water  
22 Resources. My question is, if apparently Douglas  
23 County would look favorable beyond this if for no  
24 other reason than political, but if Grant County were  
25 a soil and water resources besides, they don't like

1 the looks of this and they reject the permit, what  
2 happens? They won't grant a permit, okay. What  
3 happens? Are they -- us little guys, are we big  
4 enough to stop the steam roller? I would like an  
5 answer to that before I leave.

6 KEVIN KAIN: To be honest with you I  
7 don't know what effect it would have. I would have  
8 to look into that. I don't know how things get in,  
9 how that permit would -- or approval would fit in,  
10 you know.

11 GORDON LARSON: Well, like in a case  
12 like that, why is it called a permit? We don't know  
13 the answer to the questions.

14 KEVIN KAIN: I don't know what the task  
15 forces are myself. I would have to look, I would  
16 have to check and see what authority. I don't know  
17 what authority the Grant County Soil and Water  
18 Conservation has. Myself I would have to look at  
19 that.

20 GORDON LARSON: That would be nice for  
21 us to know because it is the only official input we  
22 have on the whole permitting process and Grant  
23 County -- Grant County Government level. They tell  
24 us the township can make all kinds of resolutions,  
25 all kinds of rules, they don't pay no attention; is

1 that correct?

2 KEVIN KAIN: Well, I can say from my  
3 own experience I know what the agency, what P.C.A.  
4 permits mean and what role they play, both units of  
5 government, how will they fit into certain projects?  
6 You know, it depends on what type of permit. But it  
7 will be something I think that your officials at the  
8 Soil and Water Conservation District would be able to  
9 help. I'll be contacting them to see what role they  
10 would have and what other affect that permit would  
11 have as well as other permits that are necessary.

12 GORDON LARSON: Thank you.

13 BONNIE NELSON: If I can respond. I'm  
14 going to be doing a permit here this Fall. One thing  
15 without the permit, we do have general conditions.  
16 The first general condition is every permit states  
17 that local county, township, any of the organizations  
18 and laws they have to comply with. Basically, they  
19 get a permit from us. Our local community or  
20 government doesn't let them go. Our permit just  
21 doesn't sit on the shelf. I've had that happen with  
22 one facility where the City issued the permit, but  
23 this project can't go forward. It depends on the  
24 local -- I don't know, again, the specifics and their  
25 authority, but there's a general condition in our

1 permit.

2 GORDON LARSON: I see. We've had an  
3 incident in the past month in the neighborhood where  
4 we had a hog set-up that was ruled out of one area  
5 and went to another one. Are you familiar with that?

6 KEVIN KAIN: No. I have been involved  
7 with a number of those that have had a similar  
8 affect.

9 GORDON LARSON: Has the local unit of  
10 government been the one that had the power to change  
11 their mind?

12 KEVIN KAIN: The P.C.A. permit does not  
13 supersede anybody else's permit being in authority.

14 GORDON LARSON: Why are we striving to  
15 get a P.C.A. permit first then? Why not all these  
16 other ones?

17 KEVIN KAIN: The way that the  
18 Environmental Equality Board rules are set up is that  
19 the Environmental Review Process has to be completed  
20 before any other permits are issued so that way, I  
21 believe, it is to give those decision makers as much  
22 information about the project as possible to see if  
23 there are any impacts on the project that might have  
24 an impact on them before they issue a permit.  
25 Without doing the environmental review they might not

1 know.

2 GORDON LARSON: I see you touched on  
3 employment and population in this book. I have to  
4 tell you the population of Hoffman is more than five  
5 hundred seventy-five people. That is another  
6 governmental agency mistake.

7 KEVIN KAIN: Can you give me the  
8 correct figure?

9 GORDON LARSON: I can tell you what the  
10 mistake was. I can't give you the exact figure. Six  
11 twenty-four. I guess I agree with these other boys  
12 on the screening. I've planted a lot of years in my  
13 farming. And unfortunately, I have planted it for  
14 the coming generation. Does that make an impression  
15 on you as far as screening goes? If you're going to  
16 build a garbage dump and disposal, you're going to  
17 screen with trees, you should have planted them trees  
18 in about 1960 instead of starting the dump and we  
19 plant these the next day. The dump is eighty feet  
20 high. The trees will be twenty feet. We touched on  
21 employment and building of this thing. I think it's  
22 minimal. As far as effect on our local area and  
23 that's the way you treated it. Overall I think you  
24 did a good job.

25 You did comment that there may be job

1 opportunities at this site. In another part of the  
2 book -- this is the book. Another part of that book  
3 it says that it will be trained personnel. So, it's  
4 rather unlikely that it would be any local people who  
5 could leave their present job and get this training  
6 if that's what it calls for and it did call for that.

7 JIM LUNGSTROM: I'm Jim Lungstrom from  
8 the M.P.C.A. The agency provides the training to  
9 whoever wants to operate a landfill. Basically, if  
10 you had an application process at the county level  
11 where people applied for the job and came down and  
12 got the training, they would be qualified to operate  
13 the landfill.

14 GORDON LARSON: Would this be  
15 on-the-job training?

16 JIM LUNGSTROM: Well, the requirement  
17 that we have is strictly a classroom training. And  
18 then there's a test and they get certified.

19 GORDON LARSON: Are you saying that you  
20 conduct a school?

21 JIM LUNGSTROM: That's correct.

22 GORDON LARSON: Full-time school for a  
23 certain period of time?

24 JIM LUNGSTROM: We offer it three times  
25 a year.

1 GORDON LARSON: How long does that  
2 last?

3 JIM LUNGSTROM: That's a three day  
4 School.

5 GORDON LARSON: Three days. That's  
6 highly skilled. I'm sorry. I shouldn't be that  
7 sarcastic. After all I've been farming forty years  
8 myself. I earned it. I didn't mean --

9 JIM LUNGSTROM: I believe there is an  
10 experience requirement prior to taking the course.

11 BONNIE NELSON: For a new facility to  
12 come in, it's hard often to find a qualified landfill  
13 operator. There aren't enough in the State. What  
14 we've been doing for a lot of facilities is people  
15 will take the course, provisionally certified until  
16 they get enough experience and meet the expects of  
17 the qualifications. I'm not sure if it's one year or  
18 two years. Otherwise, you need one qualified  
19 operator and the other people would work under him  
20 until the time they need and take the test.

21 GORDON LARSON: Basically, you're  
22 talking on-the-job training.

23 BONNIE NELSON: Yes, good equipment  
24 operators.

25 GORDON LARSON: That's what I want to

1 know. Heavy equipment operator would be one  
2 requirement; right?

3 BONNIE NELSON: I doubt the county  
4 would hire you if you couldn't operate the heavy  
5 equipment. The county would probably look for who  
6 could operate the equipment.

7 GORDON LARSON: I'm asking for M P.C.A.  
8 to stand on their words.

9 BONNIE NELSON: They have to pass that  
10 course.

11 GORDON LARSON: Okay. Getting back to  
12 the employment, I couldn't help but get the drift out  
13 of here that there will be some cheap labor needed to  
14 pick up surrounding fields. That's an admission that  
15 the screening ain't working yet. And probably won't  
16 for another fifty, seventy-five years until them  
17 trees get up, you know, probably would be some work  
18 for part-timers kids or stuff like that. That's  
19 hardly a credit to our community. I don't believe  
20 anybody will drive out from Alexandria for a job like  
21 that. You're going to site the garbage by our town  
22 and then expect us to provide coon labor for that. I  
23 don't like that.

24 On page 4.3, there's the signed comment  
25 about, "It ends up ash. The ash cells would need to

1 be assigned to comply with the rules." Is this  
2 correct? The new rule requires some kind of a  
3 artificial mine besides the plate?

4 JIM LUNGSTROM: That's correct.

5 GORDON LARSON: You drop down two  
6 paragraphs and it said, "It requires flexible  
7 membrane\clay liner for MSW landfills, unless the  
8 state is able to demonstrate that it complies with  
9 the intent of the regulations. Then M.P.C.A.  
10 believes that the clay liner would continue to be  
11 allowed, however, a final decision must still be  
12 made.

13 JIM LUNGSTROM: That's for the garbage  
14 portion of the land. The ash portion would require  
15 clay with synthetic that would be part of this  
16 project. That will be part of the requirements.

17 GORDON LARSON: It says, "However, a  
18 final decision will still be made."

19 KEVIN KAIN: The draft, when that part  
20 of the draft was completed, the ash rules had not  
21 been finalized. We did not know what the outcome was  
22 going to be.

23 GORDON LARSON: And now you know.

24 KEVIN KAIN: That's correct.

25 GORDON LARSON: It is set?

1 KEVIN KAIN: Yes.

2 GORDON LARSON: Okay. Did you test any  
3 of these other sites that were proposed? Did you go  
4 up and view them? Did you test them? Did you look  
5 at them or did you just review some data or did you  
6 just accept previous testimony or previous comments?

7 KEVIN KAIN: We only reviewed the site  
8 that was the facility that was proposed that we  
9 received. That's what we reviewed.

10 GORDON LARSON: How come you make that  
11 last statement in this book there?

12 KEVIN KAIN: As far as an in-depth  
13 view, the review of the alternative sites for the  
14 site that the county had gone through? Larry, maybe  
15 you could cover that.

16 LARRY ANDERSON: You referred to a  
17 statement that --

18 GORDON LARSON: On page 6-3, the  
19 summary. "It appears that of the sites offered for  
20 sale, the Solem Township site was the one most  
21 environmentally and locationally desirable site for  
22 landfill." And I challenge that statement because  
23 you have just told me that you did not extensively  
24 test other sites.

25 LARRY ANDERSON: Again, my job was to

1 review what was done and to determine whether it  
2 was -- whether I feel they dropped the ball  
3 somewhere. Any information that was presented,  
4 that's all that was reviewed was the information  
5 presented. The information was presented and  
6 identified reasons, environmental reasons why they  
7 rejected the other sites. And in those cases, it was  
8 that most cases the ground water was high.

9 KEVIN KAIN: One of the things that  
10 came out as I remember when the EIS process and the  
11 decision to go ahead with the EIS was the question of  
12 how the county got involved in making a major  
13 determination on which cite to select. And we wanted  
14 to be very specific and in the scoping document was  
15 to go through their -- what they did, you know, in  
16 their site selecting process and that's what we  
17 reviewed. We went through what they did and the  
18 information they looked at and then based on that  
19 conclusion that they came up with and its summary,  
20 that's what's in the draft is just a summary of what  
21 the county went through, and what the county did.  
22 It's not what the agency did or what we would do or  
23 what we would not do. It was just a summary of what  
24 the county did. It was largely to clear that up. I  
25 know there are some citizen boards who are very

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1 confused as to how the county had gone about  
2 selecting the site. And that was a question that  
3 they had raised and I wanted to make sure that we  
4 looked at that in depth and that's what we did.

5 GORDON LARSON: That still appears to  
6 me that it's a misleading statement. It gives me the  
7 idea that you investigated other sites thoroughly as  
8 you did this site. And you say that is not true, you  
9 took somebody else's word for it.

10 KEVIN KAIN: If the statement comes out  
11 that way, it should not. And that's what I need to  
12 know so that will be clarified.

13 GORDON LARSON: You will clarify it.

14 ROGER WILLIAMS: Your comment is noted.

15 KEN JOHNSON: I have a question. Under  
16 the Contingency Action Plan the other gentleman made  
17 reference to it. A lot of the situations you talked  
18 about, leachate seeps, settlement of final cover,  
19 contamination of groundwater, landfill gas detection,  
20 leachate spill, storage tank leakage, financial  
21 assurance. A lot of times you say, "The time and  
22 cost estimated to remove and replace a leaking tank  
23 appears too low." You make reference to "too low".  
24 I assume that is in the work of the process. You end  
25 with "financial concerns calculation". Are they

1 based on the definition that you got from the Soil  
2 and Water Board?

3 LARRY ANDERSON: My estimate is my own  
4 estimate that I prepared and that's where I felt if I  
5 were doing that there would be twice as much money  
6 set aside for financial assurance as they had  
7 proposed.

8 A VOICE: I would like to make one  
9 comment. I don't mean to be an expert, but having  
10 some experience with sewage in the petroleum  
11 business, there's no way you're going to clean this  
12 up for two million dollars. And we know it. And if  
13 it takes ten years for Pope and Douglas County,  
14 that's a hundred and twenty months for the payments  
15 to put in two million dollars for clean up money, and  
16 that includes long term care courses Mr. Anderson  
17 referred to forever. Now, if the Soil and Water  
18 Board do not take a better stand from a long term  
19 care than seventeen thousand five hundred fifty  
20 dollars a month, we're in trouble.

21 DENNIS SATRE: I got a question on the  
22 smell factor. My understanding if leaching is used  
23 for quench on the ash, it will be recycled; is that  
24 right? Well, the more times it's going to be  
25 recycled, the greater the smell is going to become

1 with this ash. It will be out there and won't that  
2 be a factor?

3 ROGER WILLIAMS: Is that a comment or a  
4 question?

5 DENNIS SATRE: Whichever.

6 ROGER WILLIAMS: Do you want to  
7 respond?

8 DENNIS SATRE: I think this ash I  
9 talked to somebody and he said that once you run this  
10 water through the ash it does have an odor to it.  
11 That would be the same with the leaching, if you keep  
12 recycling it, it gets stronger every time you run it  
13 through, won't it?

14 KEVIN KAIN: I don't know if it would  
15 or not. I'll have to check. I'll look into that.

16 ROGER WILLIAMS: Are there others that  
17 would like to make comments?

18 JOYCE JOHNSON: My house is going to be  
19 about a hundred feet from there. Am I going to have  
20 to wear a gas mask to go out and work in my garden?  
21 I'm going to look out my patio door and I'm going to  
22 see a pile of garbage? And then the editor of the  
23 Echo had the audacity to say, well, land values will  
24 lose fifty percent and we'll just raise the cost of  
25 hauling the garbage out to compensate for what we've

1 lost. Now, that really makes me feel good. It's a  
2 good thing you guys don't know what I really feel  
3 because they probably wouldn't let me back in town.

4 ROGER WILLIAMS: Thank you for your  
5 comment. Others who haven't yet had a chance to  
6 talk? Anyone?

7 GORDON LARSON: I think Mrs. Johnson  
8 raises a point. She's not being hysterical about it.  
9 They do live close. They live almost in the direct  
10 prevailing wind. How would you like to be in her  
11 position as far as a home goes? If this landfill can  
12 be made so attractive and not supposed to bother  
13 anybody, why isn't it over by Alexandria? Why isn't  
14 it on the north side of Alexandria?

15 ROGER WILLIAMS: I guess that's a  
16 question the agency can answer because they sited it.

17 GORDON LARSON: Well, if they've done  
18 nothing with this but site this, there should be  
19 absolutely nothing in this report about the site, is  
20 the way I look at it.

21 ROGER WILLIAMS: It was in there  
22 strictly for clarification and history. Anyone else  
23 who has a comment or question? Anyone else? Kevin,  
24 do you have any concluding comments? I'm sorry.

25 DENNIS WINTER: W-I-N-T-E-R. I'm board

1 supervisor of the Elbow Lake Township where this  
2 water will go into our township. I've been sitting  
3 up there. I probably will repeat a few things, but  
4 the first thing I want to make a point about is I  
5 wrote a letter after the EAW and was told you have to  
6 use technical terms because that's the only thing the  
7 board understands. And I want to compliment you on  
8 this report because it isn't very technical. It gets  
9 down to the facts. It's forty feet and so many feet  
10 above sea level. And I thank you for that.

11 I understand that there's no  
12 incinerator in the State of Minnesota. Is that true  
13 that in the next five years or eight years or  
14 something like that it's possible incinerators will  
15 cease to function? So, my question is, I think it  
16 should be addressed. This is a site based the on  
17 tonnage, not necessarily years, correct? And it  
18 fills up because it's solid waste and not ash. It's  
19 not going to last thirty years. It's going to be  
20 very fast.

21 And the wind problem is something that  
22 wasn't talked about. I'm not a volunteer fireman. I  
23 understand our fire department is not qualified to go  
24 and answer a fire on it there. They don't want to be  
25 qualified either, if I understand it right, because

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1           it's dangerous and Alexandria is sixteen miles away.  
2           So, I think that's an issue that hasn't been  
3           addressed very effectively. Hopefully when you come  
4           up with a summary of things that could be better. As  
5           he pointed out, there's not enough dollars listed and  
6           Mr. Johnson is right. They're still way short. I  
7           would like to see a summary. If you think this is a  
8           pretty good site because of these reasons, I want  
9           answers to these questions on a page not referring to  
10          page 699.2. I want questions and answers, not  
11          referring me somewhere else. We don't have the time  
12          to do this. We're trying to make a living.

13                         And then the last question is, who is  
14          going to monitor it? Those of us living over here,  
15          we're going to put the fox inside the chicken house.  
16          That's not going to work. One possibility is to  
17          train somebody from our situation to go out and watch  
18          to make sure they do it right, but who is going to  
19          pay this person? If the Solid Waste Board does not  
20          follow the rules, what happens? I mean, I'm on two  
21          boards now and we've got errors and omissions and  
22          insurance is big deal. It doesn't solve the problems  
23          for future generations. Thank you.

24                         ROGER WILLIAMS: Thank you for your  
25          comments. Any other questions or comments? Anyone

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1 else? Could you give us a brief summary of the steps  
2 that proceed here? I think that's on your sheet.

3 KEVIN KAIN: Again, in August, at the  
4 end of August, I'm planning on going in front of the  
5 Committee Board. We've got six members that are on  
6 the Solid Waste Committee. We meet on Mondays. It's  
7 a little bit more of an informal meeting and I will  
8 be bringing them up to date where we were with the  
9 EIS process and summary of the issues that I received  
10 in the public comment period. That's what I plan to  
11 do at that point, just getting them familiar with  
12 some of the issues that are out there and when I do  
13 that, I will be going to the board. Everybody on the  
14 mailing list will be notified of that fact and you're  
15 welcome to come down and participate in that public  
16 meeting and that discussion. If you think you will  
17 be coming, drop me a note or give me a call and I  
18 will let the board know and we can allow the proper  
19 amount of time if you want to come down and discuss  
20 it. Glad to do that. So, that will be in August.  
21 In September sometime the final EIS will be done and  
22 out and which will include responses to comments. I  
23 will do my best to have the responses with the  
24 questions. I do try to do it in an efficient way as  
25 possible and to use as little paper as possible.

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1 It's a lot. And then at that point, when the final  
2 is out, you can send in written comments on the final  
3 EIS.

4 And possibly in October, we'll be going  
5 to the board for a decision. If you need time to go  
6 to the board within the project, you're welcome to  
7 come down and participate in it. It's a public  
8 meeting and there will be an agenda, what they call  
9 an agenda that you will receive in the mail that will  
10 explain what I will be doing there. So, you will  
11 know what's coming up and how you might want to  
12 prepare any testimony or comments that you might have  
13 to know what they'll be reading from me and you know  
14 what things there are to determine if the project is  
15 adequate and move into the permitting process and  
16 proceed from there.

17 ROGER WILLIAMS: If the record is  
18 extended, how will people know that?

19 KEVIN KAIN: You will be notified if  
20 the comment period is extended. I will send a letter  
21 out to everybody on the mailing list. If you're not  
22 on the mailing list or if you didn't receive a  
23 drafted EIS, let me know and I'll be happy to put you  
24 on the list.

25 STAN STARK: Will the Citizen Board

1 have an opportunity to visit the site personally or  
2 not?

3 KEVIN KAIN: That question has come up  
4 before. The thing to do is to contact the Citizen  
5 Board members and invite them out. We've sort of  
6 worked for Citizen Board and, you know, and they set  
7 their own schedule. If you would like them to visit  
8 the site and offer that invitation, I think that  
9 would be a good idea. And, so, you send it. I can  
10 tell you to send that request letter to the chairman  
11 of the board.

12 A VOICE: If these final plans are  
13 okayed, can the Pope-Douglas Board do lesser than  
14 what the plans called for with your approval?

15 KEVIN KAIN: No.

16 A VOICE: Everything we can get them to  
17 do is that much more to our benefit?

18 KEVIN KAIN: That's right.

19 A VOICE: I would like to know in this  
20 report where the additional sites were. We would  
21 like to know if there's any politics being pulled on  
22 the site or sites.

23 KEVIN KAIN: The sites were looked at  
24 in the process and are in the draft document.

25 A VOICE: You did have an eight hundred

1 number.

2 KEVIN KAIN: We have a new one.

3 SCOTT HVIDSTEN: We have two.

4 1-800-652-9747. We're getting a new number and the  
5 old one is being phased out in October.

6 KEVIN KAIN: Ask for me at the  
7 Pollution Control Agency. Specify the Pollution  
8 Control Agency. You'll be coming into the general  
9 state operator and you have to get the P.C.A. and  
10 then they'll transfer you to me.

11 A VOICE: We are all told to call your  
12 office.

13 ROGER WILLIAMS: Call the office and  
14 ask for Kevin and if he's not there, Kevin will call  
15 you back.

16 KEVIN KAIN: You're calling on your own  
17 dime. Once you make contact either with me or the  
18 phone rolls over and you talk to one of the  
19 secretaries, just say I'm calling and I would like to  
20 have me call you back and then we'll do that as soon  
21 as possible.

22 A VOICE: What's that number again?

23 KEVIN KAIN: 1-800-652-9747.

24 SCOTT HVIDSTEN: They can grab a  
25 business card on the table on their way out.

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1                   ROGER WILLIAMS: There are business  
2 cards on the way out. What about a sign-up sheet or  
3 EIS for people who did not get one?

4                   KEVIN KAIN: If you did not get a draft  
5 of the EIS, I've got a sheet right up here. Check to  
6 make sure that you are on it. I would ask that if  
7 you have two mailing addresses, only use one. We  
8 would like to save as much paper as we can.

9                   A VOICE: When you go before the Board  
10 possibly in September, is this the only thing they're  
11 going to be considering, the committee I should say,  
12 or probably not?

13                   KEVIN KAIN: No. The Board is going to  
14 have an agenda. That's why it's generally good for  
15 me to know an idea of how many people are coming down  
16 so I can ask for the proper amount of time. And the  
17 Board meets on Monday in a committee setting, which  
18 is quite informal, and then again on Tuesday where  
19 there's a full board there and quite a formal setting  
20 where you are talking full board.

21                   ROGER WILLIAMS: There is an extra copy  
22 of the draft here for anyone who doesn't have one.  
23 Any other comments or questions?

24                   GERALD JOHNSON: J-O-H-N-S-O-N. A  
25 matter of compensation for land values. My folks

1 live next to the landfill by Carlos. And they're  
2 retirement is about shot. They're retirement is  
3 pretty well wrapped up in their farm and their well  
4 is dry now. They've had a new well dug. The first  
5 one was thirty feet. This one was a hundred six, but  
6 it's the same aqua fair. So, I don't know if that  
7 means too much. And it's -- they've never been  
8 hooked up yet. It's been since last October. So, I  
9 would certainly hope that with this one the land  
10 owners around there would be compensated for the loss  
11 and value of their property. Thank you.

12 ROGER WILLIAMS: Thank you. Time for  
13 about one more question.

14 A VOICE: Wasn't there some law that  
15 federal government put out pertaining to that?

16 ROGER WILLIAMS: Pertaining to leaking  
17 landfills?

18 A VOICE: Compensation to people that  
19 loses their --

20 KEVIN KAIN: Not that I'm aware of.  
21 But I'll be glad to look into it.

22 A VOICE: I thought I read something on  
23 that this Spring.

24 KEVIN KAIN: I'll do that also as part  
25 of my response and comments. I'll look to see if

1           there's any federal legislation on the land value  
2           compensation.

3                   A VOICE: Like if you had land that was  
4           worth a thousand dollars an acre and you would only  
5           get three or four hundred dollars for it now that  
6           you're next to it.

7                   ROGER WILLIAMS: Kevin, anything else?  
8           Now, I would like to thank you all for coming and  
9           like I said before, your comments and your concerns  
10          make this a better project. It makes this whole  
11          system work. Please send in your written comments.  
12          It does make for a better project every time we get  
13          it. Again, thank you for coming tonight.

14

15

(End of record.)

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REPORTER'S CERTIFICATE

I, Brenda J. Wild, do hereby certify that I recorded in Stenotype the proceedings in the matter of the Minnesota Pollution Control Agency Public Meeting for the Draft Environmental Impact Statement on the Proposed Pope-Douglas Incinerator Ash\Bypass Landfill, on the 21st day of July, 1992, at Hoffman, Minnesota;

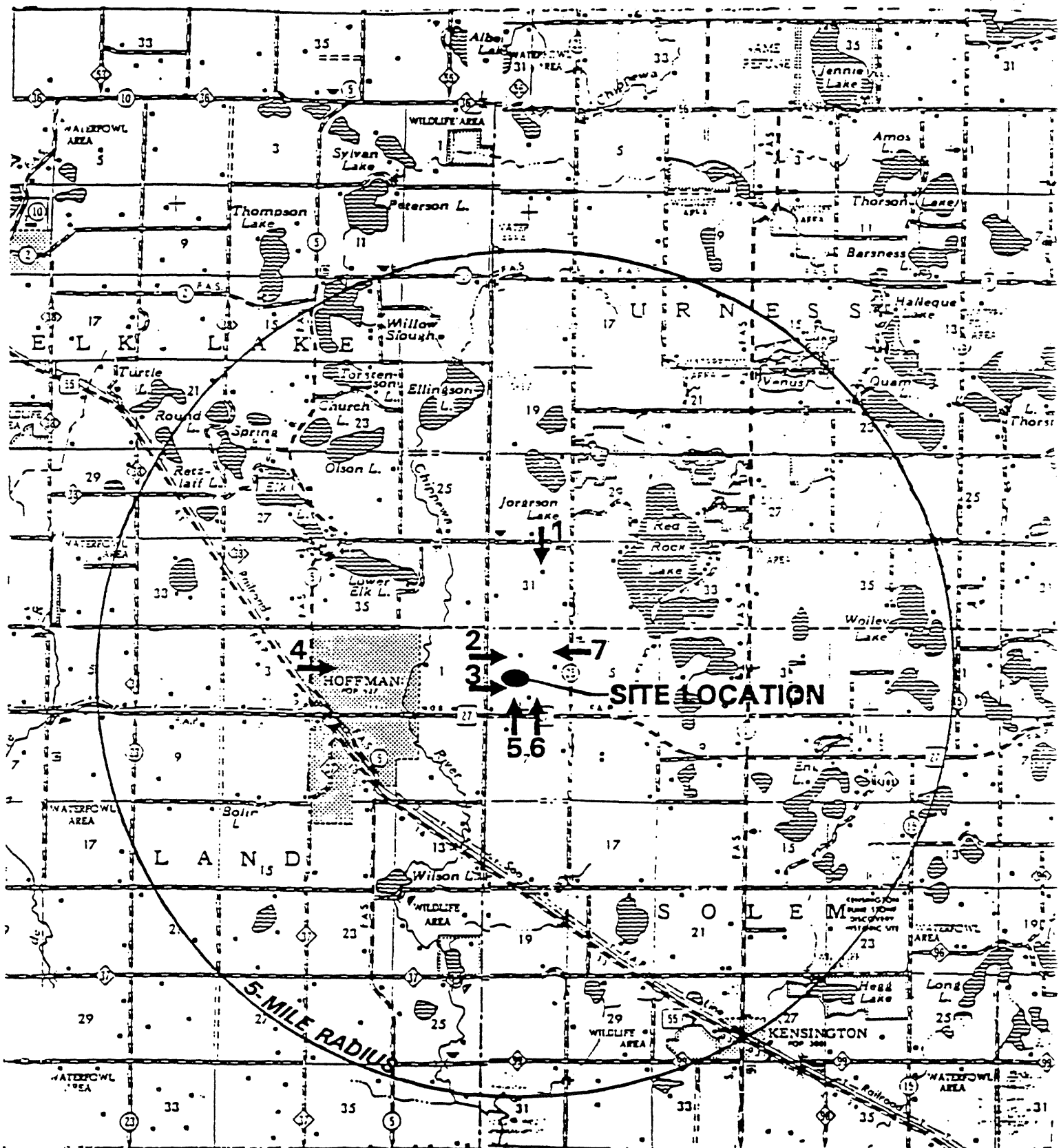
I further certify that thereafter and on this same date I transcribed into typewriting the foregoing transcript of the said recorded proceedings, which transcript consists of the preceding ~ pages;

I further certify that said transcript of such proceedings is true and correct to the best of my ability.

  
Brenda J. Wild

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**APPENDIX C**  
**ANTICIPATED LANDFILL APPEARANCE**



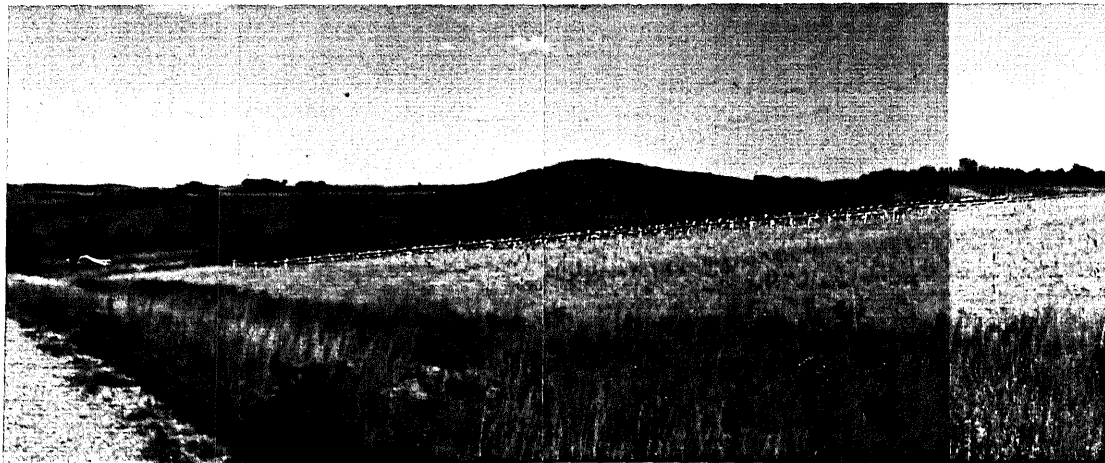
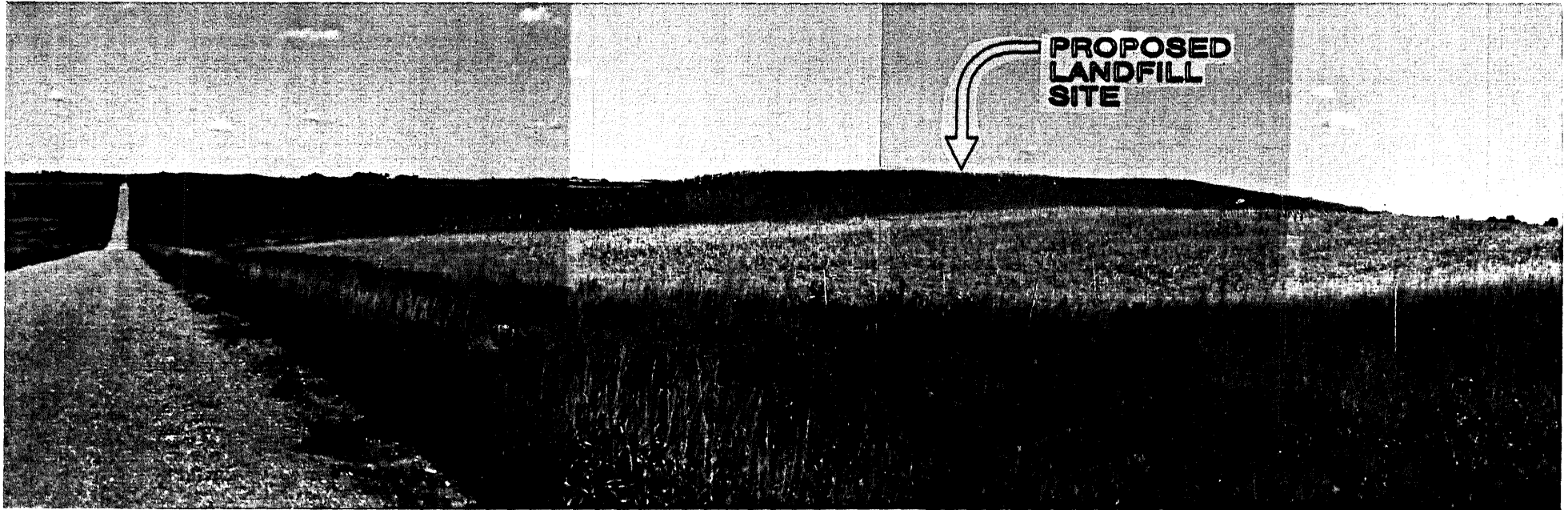
# PHOTO REFERENCE MAP

FIGURE 1



PHOTO NO. 3  
**EXISTING VIEW**

FIGURE 6



**CONCEPTUAL VIEW - 10 YEAR STAGE**

**PHOTO NO. 3  
CONCEPTUAL VIEW**

**FIGURE 7**

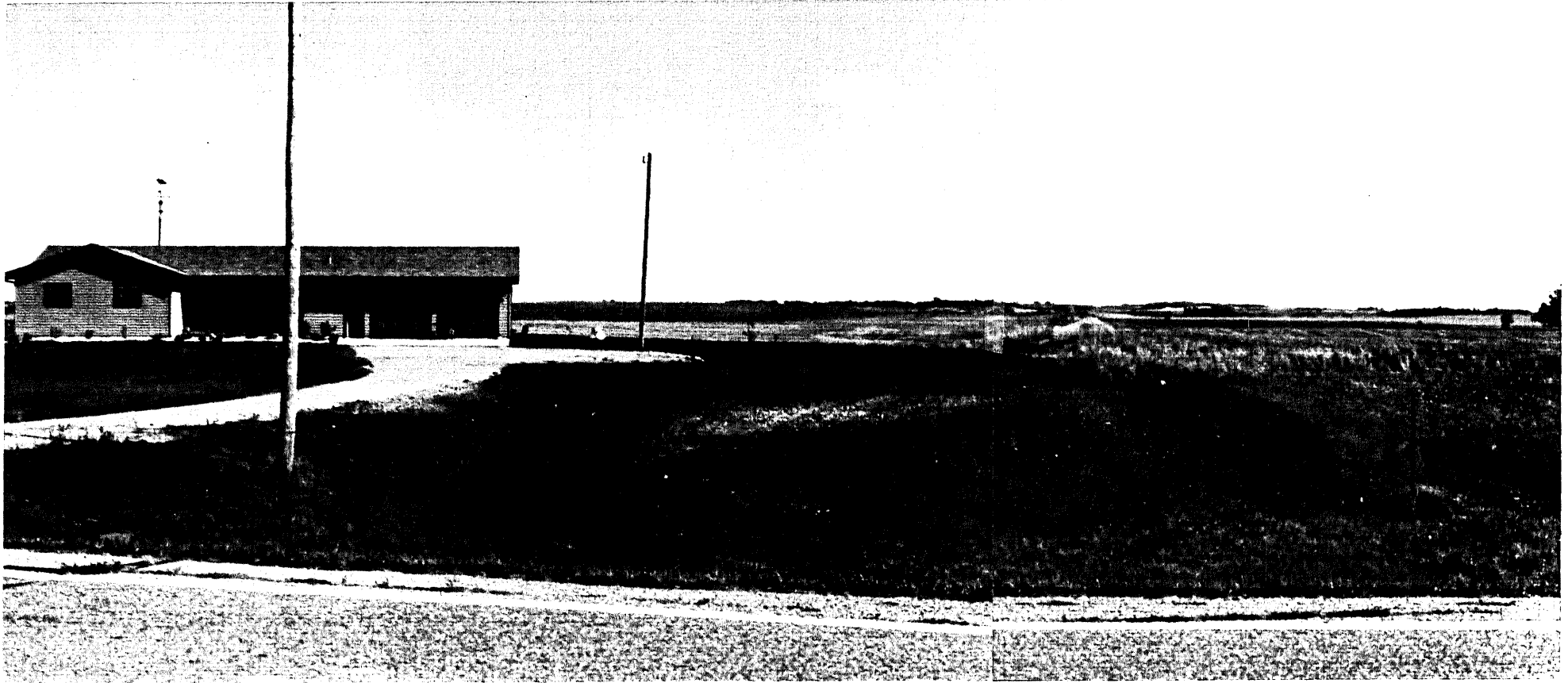


PHOTO NO. 4  
**EXISTING VIEW**

FIGURE 8

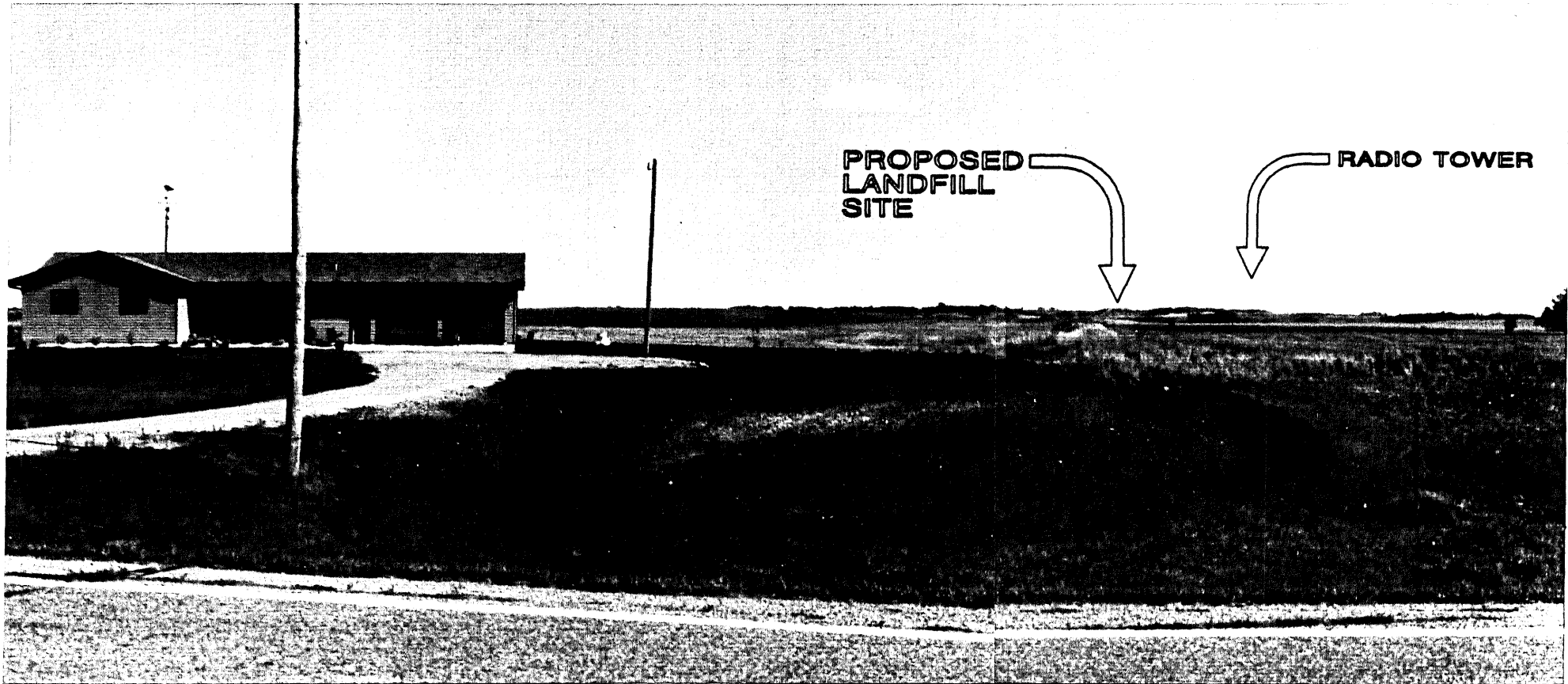


PHOTO NO. 4  
**CONCEPTUAL VIEW**

FIGURE 9

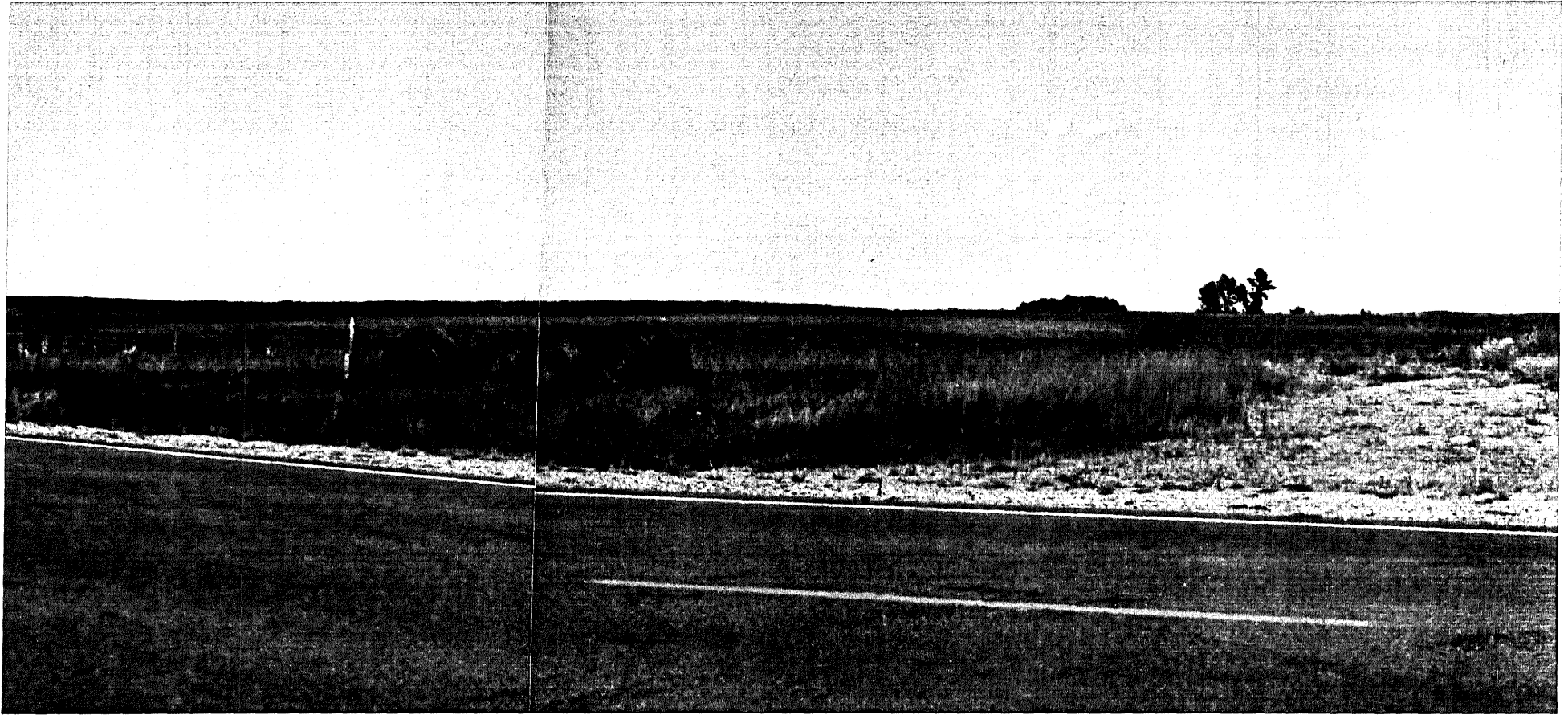


PHOTO NO. 5  
**EXISTING VIEW**

FIGURE 10

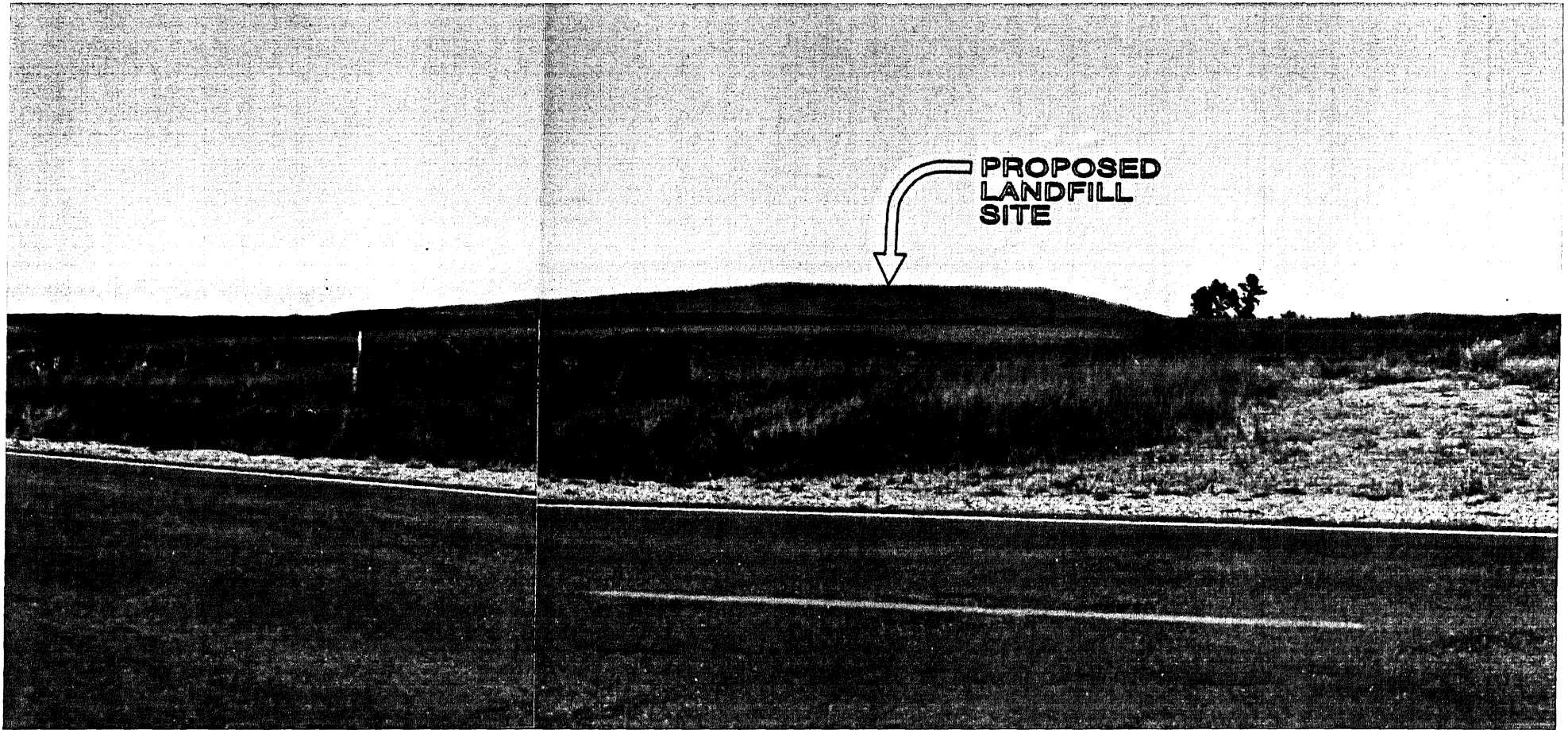


PHOTO NO. 5  
**CONCEPTUAL VIEW**

FIGURE 11



PHOTO NO. 7  
**EXISTING VIEW**  
FIGURE 14

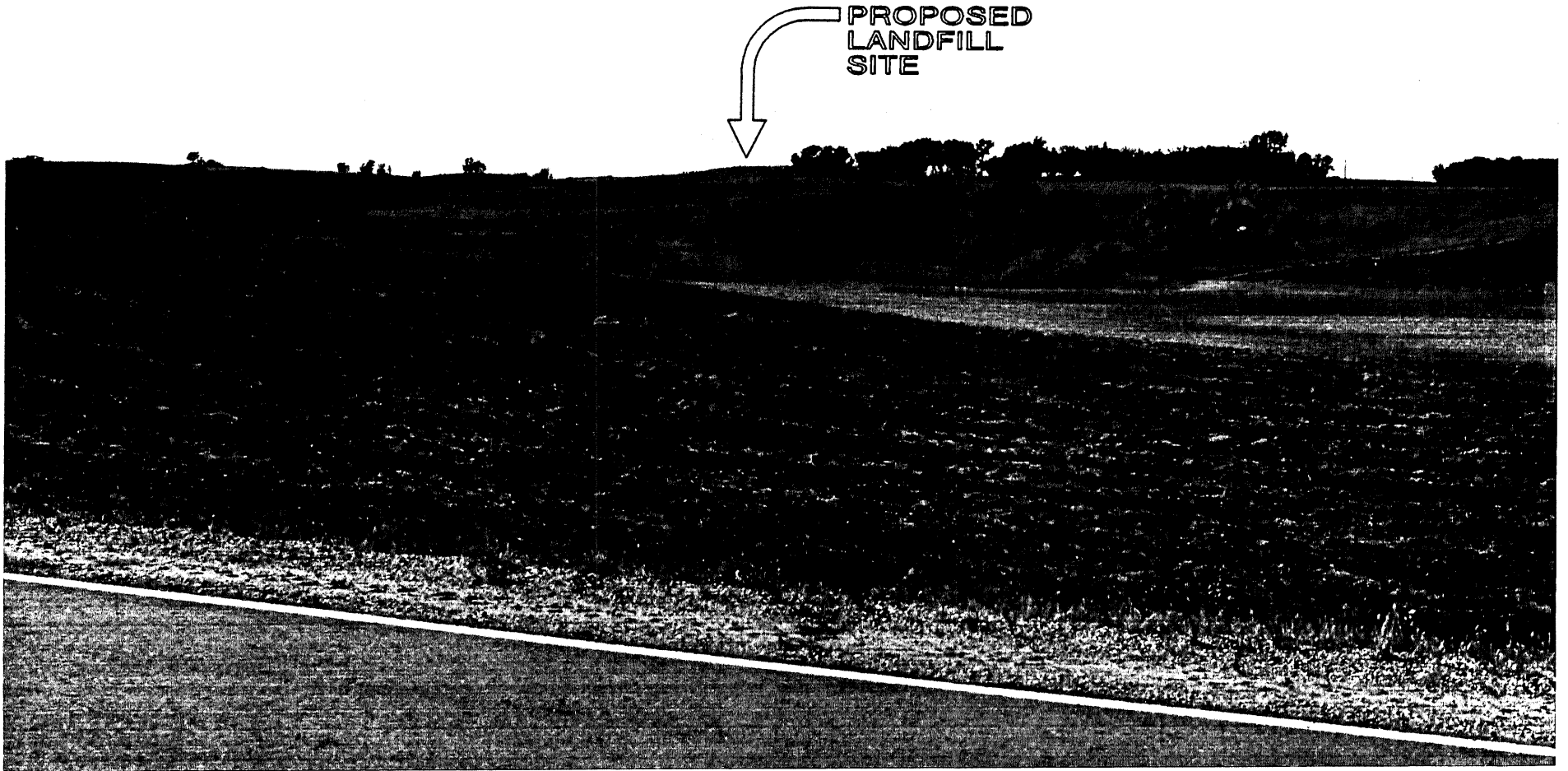


PHOTO NO. 7  
**CONCEPTUAL VIEW**  
FIGURE 15