



Hennepin County Board of Commissioners
A-2400 Government Center
Minneapolis, Minnesota 55487-0240

August 30, 2022

Minnesota Pollution Control Agency
c/o Cliff Shierk, Principal Engineer
520 Lafayette Road
Saint Paul, MN 55155

Dear Mr. Shierk,

Recently, the MPCA received an application for a Solid Waste Facility Permit (Permit) from Burnsville Sanitary Landfill, Inc. The MPCA has issued a draft Permit for public comment. As an adjacent county with many residents who would be directly impacted by the BSLI Landfill Expansion, Hennepin County has significant concerns regarding the application.

The purpose of this letter is to share those concerns and to formally request that the MPCA deny the Permit application.

Concerns

1. **Groundwater Impacts.** Of great concern, the SEIS points out that parts of the BSL are unlined and that, during flooding events along the Minnesota River, the water table rises and interacts with the unlined portions of the landfill. The SEIS also predicts that the future discontinuance of dewatering at the adjacent Kraemer Quarry will significantly increase the elevation of the water table, resulting in regular interaction between waste in the unlined portions of the landfill and groundwater.

2. **Visual Impacts.** If the MPCA ultimately approves the full proposed volume of the BSL through this Permit and subsequent Permits, the design capacity of the landfill will be increased to 45 million cubic yards at buildout in 2062, a staggering volume that is difficult to visualize. To put that volume in context, the largest pyramid in Egypt has a volume of 3.37 million cubic yards. The expansion is proposed to increase the height of the landfill to an elevation of 1,082 feet above mean sea level, which is 372 feet above surrounding grade and 389 feet above the nearby Minnesota River. If the MPCA approves this expansion, the BSL will become the dominant and defining visual feature, indeed the representative symbol, of Burnsville and the surrounding area.

3. **Surface Water Impacts.** The Final SEIS notes that, in a 500-year storm, the proposed expansion will increase the peak storm water runoff discharge rate from the site by 47% due to the increase in landfill slope proposed with the expansion. Climate change is resulting in more frequent large storm events. A significant increase in peak runoff rates will cause substantial negative impact to people and property downstream during these major rainfall events, which is the time at which faster runoff rates are most damaging.

4. **Air Quality.** The SEIS estimates that, at buildout, the landfill will generate 5,863 standard cubic feet of landfill gases every minute. Of that volume, 75 percent is planned to be captured and 25 percent will escape into the atmosphere. Roughly half of the captured gases will be flared on site. As a direct result of the expansion, the SEIS reports that volatile organic compounds will increase by 10.2 tons/year and hazardous air pollutants will increase by 5.4 tons/year.

5. **Environmental Justice.** The SEIS states that the project is located within an area of concern for environmental justice. The State of Minnesota flags this area for concern based on U.S. Census Bureau income data for the Burnsville neighborhood hosting the landfill.

6. **Odor.** The landfill is located within 1,000 feet of residences in Burnsville and 3,400 feet of residences in Bloomington. Depending on wind direction, odor impacts from both the trash deposits and from methane and other volatile organic compounds is anticipated. The SEIS estimates that, at buildout, 1,465 standard cubic feet of landfill gases per minute will not be captured or flared and instead will escape into the atmosphere.

7. **Noise.** The landfill expansion will generate noise impacts for surrounding residential uses as machinery shuttles the waste from 57 fully loaded garbage trucks per day up the steep inclines to the top of the landfill. Large earth movers will create more noise as fill is added on top of the waste.

8. **Aviation Impacts.** Landfills are notorious for attracting large birds. During a visit to the perimeter of the BSL, Bloomington staff observed numerous eagles, gulls, and other large birds. The birds attracted to landfills and corresponding concerns regarding mid-air collisions with birds are the primary reason the FAA has serious concerns about placing landfills near airports. The Burnsville Sanitary Landfill expansion is proposed near MSP International and Flying Cloud Airports.

Based on these significant concerns and the information brought to light by the MPCA's environmental review in the SEIS, **I formally request that the MPCA deny the Permit application to expand the landfill.** If the MPCA decides to instead proceed with a Permit, please adopt the conditions of approval suggested by the City of Bloomington.

Sincerely,



Commissioner Debbie Goettel
Hennepin County District 5 | Bloomington, Eden Prairie, Richfield

cc: Katrina Kessler, Commissioner, MPCA
Glen Markegard, Planning Manager, City of Bloomington

