



8150 Barbara Avenue
Inver Grove Heights
Minnesota 55077

651-450-2500

www.ighmn.gov

September 15, 2023

Minnesota Pollution Control Agency
c/o Peter Sandhei
520 Lafayette Road N.
St. Paul, MN 55155

Subject: City of Inver Grove Heights Public Comments on Draft Metropolitan Solid Waste Management Policy Plan 2022-2042

Dear Peter,

The City of Inver Grove Heights, Minnesota is the host community of three permitted landfills: Pine Bend Sanitary Landfill SW-45, Dawnway Demolition Landfill SW-303 and SKB Rich Valley Landfill SW-343. Per Table 11 of the draft Metropolitan Solid Waste Management Policy Plan (MPP), Pine Bend Landfill remains one of the largest mixed municipal solid waste landfills within the Twin Cities Metro Area, resulting in disposal of several hundred thousand tons of regional waste in Inver Grove Heights annually. Although landfilling is designated as the least favorable solid waste disposal method, the draft MPP confirms that landfilling will remain a necessary form of disposal for TCMA waste. In 2021, Pine Bend Landfill received the largest allocation of TCMA certificate of need (CON), in the amount of 2,398,746 tons, for additional MSW disposal capacity. Acceptance of this additional CON would require Pine Bend Landfill to vertically expand and significantly extend the landfill's approved duration to operate.

As the host community of three landfills, the City of Inver Grove Heights has the following comments on the draft MPP:

1. The City of Inver Grove Heights, as a community that receives vast quantities of garbage generated in and around the metro area, strongly encourages the Minnesota Pollution Control Agency (MPCA) and Dakota County to adequately fund and put into place the legislative and financial resources needed to ensure that the number one strategy of the waste hierarchy is prioritized over the other strategies of the waste hierarchy, including recycling, waste to energy and landfilling.
2. Required strategy #34 states, "Establish mandatory pre-processing of waste at resource recovery facilities and landfills by 2025". The City of Inver Grove Heights requests the MPCA provides a definition for "mandatory pre-processing" at landfills. This will allow the city to determine any potential conflicts with existing local ordinances, impacts on our community and if the implementation timeline is achievable.
3. Removing per- and polyfluoroalkyl substances (PFAS) at wastewater treatment facilities has been proven to be cost prohibitive (*Evaluation of Current Alternatives and Estimated Cost Curves for PFAS Removal and Destruction from Municipal Wastewater, Biosolids, Landfill Leachate, and Compost Contact Water, May 2023*). Instead, the best strategy to minimize

PFAS entering MCEs facilities from landfill leachate is to treat the leachate at the landfill where the source of PFAS is concentrated. The City of Inver Grove Heights strongly encourages the MPCA to prioritize research and development of treatment and/or removal options for PFAS in leachate at landfills. The City encourages the MPCA to incorporate PFAS treatment and/or removal requirements into MPCA landfill solid waste permits as soon as possible.

4. To minimize future PFAS from ending up in landfills, MPCA should require landfills to address PFAS in their industrial solid waste management plans so that PFAS-containing wastes can be identified and rejected as appropriate.
5. The City encourages the MPCA to update the CON review and issuance process so that it is streamlined and consistent year-over-year.

Thank you for the opportunity to comment on this important local and regional matter.

Sincerely,

City of Inver Grove Heights

cc: Ally Sutherland, Environmental Specialist
Kris Wilson, City Administrator
Bridget Nason, City Attorney