

August 25, 2023

Minnesota Pollution Control Agency
c/o Katrina Hapka
520 Lafayette Road
St. Paul, MN 55155

RE: Public Comment to the MPCA's EAW for the Met Council's Metropolitan Wastewater Treatment Plant

Dear Ms. Hapka,

This public comment in response to the Minnesota Pollution Control Agency's (MPCA) Environmental Assessment Worksheet (EAW) is written on behalf of Ramsey County Commissioner Mai Chong Xiong (District 6) and Ramsey County Commissioner Rafael E. Ortega (District 5).

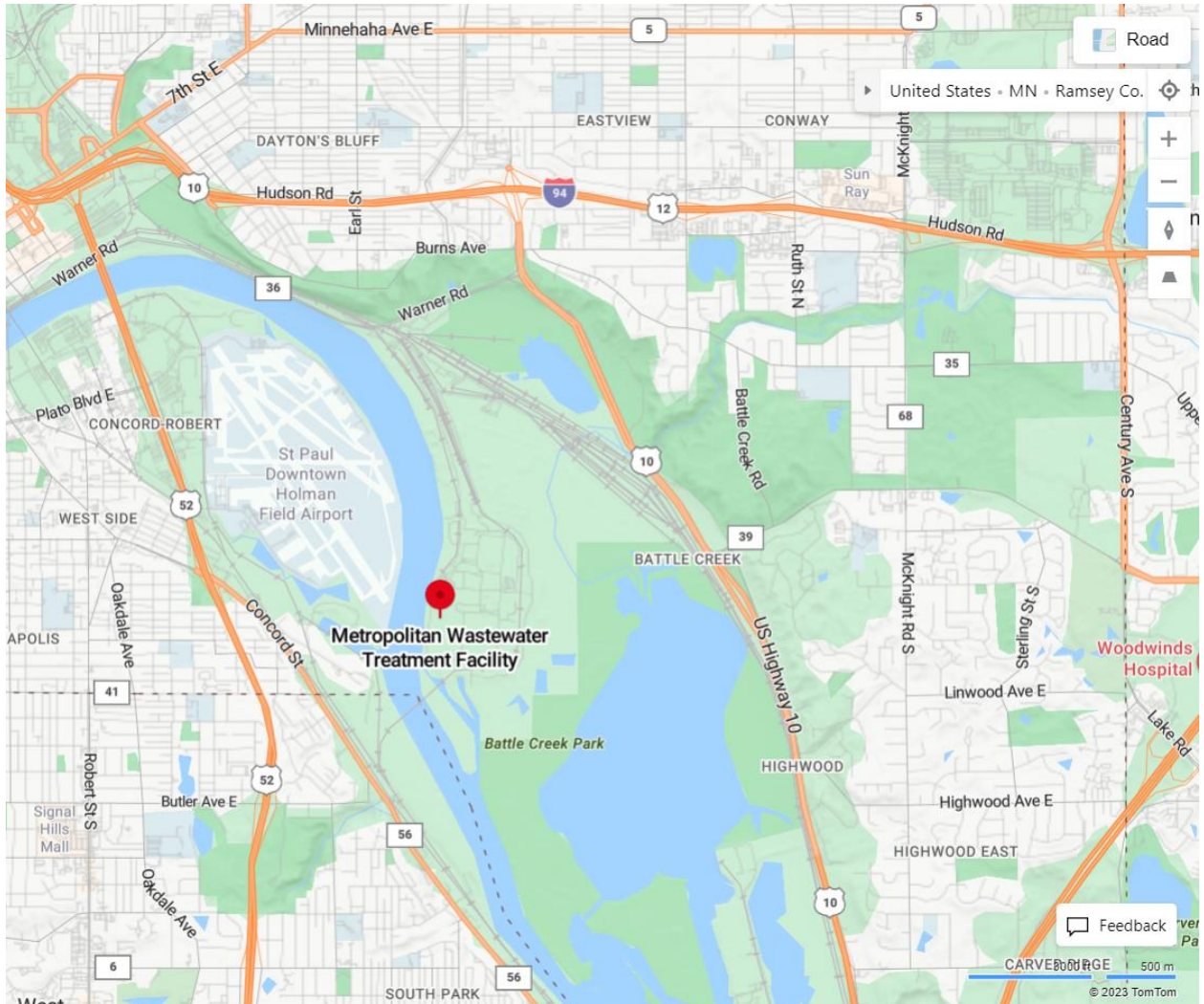
General Background of Agencies

The Metropolitan Council (Met Council) is a regional policy-making body, planning agency, and provider of essential services across the seven counties that make up the Twin Cities metro area. The Metropolitan Council Environmental Services (MCES) is a division of Met Council that owns the Metropolitan Wastewater Treatment Plant in Saint Paul, which is the largest wastewater treatment facility in Minnesota. The facility, located in Saint Paul between the Mississippi River and Pig's Eye Lake, processes waste from all metropolitan counties and additional solids trucked in from four other treatment plants. The facility currently treats 180 gallons of wastewater every day, which results in the capture of 850 tons of solids daily. The three incinerators burn the 850 tons of solids resulting in 40 tons of ash. MCES is proposing the addition of a fourth incinerator and associated equipment and facilities to accommodate a growing population within the Twin Cities.

To understand the scope of the addition of a fourth incinerator, Ramsey County Commissioners Xiong and Ortega have sought information and feedback from the Met Council, MCES, the MPCA, the City of Saint Paul, Saint Paul-Ramsey County Public Health, local district councils, environmental organizations, and concerned community members. Given that MCES's addition of a fourth incinerator is located near and within low-income communities and racially and ethnically diverse communities that are already susceptible to poor air quality and associated health risks, the representative county commissioners submit this comment for review.

Ramsey County and its commissioners do not oversee the functions of Met Council or MCES, although the Met Council partners with Ramsey County to deliver many programs and services.

Socioeconomic Demographics of Surrounding Area



(Google Map image captured on August 23, 2023)

The treatment facility is located on 2400 Childs Road in Saint Paul, MN within Ramsey County Commissioner District 5, adjacent to District 6. As determined by the EAW, residential areas are one mile east past Pig's Eye Lake, Highway 10, and the railroad. Humboldt Senior/Junior High is approximately two miles to the west. Nearby parks include Pig's Eye Regional Park immediately east/northeast and Battle Creek Regional Park about one mile east/northeast. These parks feature hiking and biking trails. Smaller parks in the residential areas include Kaposia, Port Crosby Thompson County, Pleasantview, Henry, Lower Landing, Harmon, and Northview Pool.

Furthermore, the Dayton's Bluff neighborhood is two miles northwest of the facility. The Dayton's Bluff Elementary School sits three miles northwest. Indian Mounds Regional Park is about 2 miles north.

According to Ramsey County's report on air quality (see Attachment A), poor air quality can affect lung and heart health. Scientific studies have shown that exposure to poor air quality can lead to a sore throat, persistent cough, burning eyes, wheezing, shortness of breath or

chest pain. Elevated pollution levels can also trigger asthma attacks, hospital admissions and emergency room visits, heart attacks, and premature death. The MPCA, by using the Air Quality Index (AQI), has determined that there has been an increase of good AQI days across Minnesota. However, Ramsey County found that the Twin Cities routinely has the fewest number of good days due to the density of air pollution sources that facilities like the treatment plant contribute to. The Twin Cities historically has also experienced the most air alert days since 2005 as compared to other regions over time.

Ramsey County also found that air pollution disproportionately impacts the health of communities living in areas with higher concentrations of poverty and people of color. Here, the facility sits between the West Side and Battle Creek neighborhoods. In these neighborhoods, up to 39% of households were estimated to be in poverty, with a higher poverty concentration in the West Side neighborhood where the facility is directly adjacent to (see Attachment A). Additionally, the Dayton's Bluff neighborhood, which is north of the facility, has an estimated poverty rate of 20% to 39%.

These air pollution-related health impacts are underlined by other health inequities such as limited access to healthcare, transportation barriers, lack of health insurance, and more. The county determined that "more work needs to be done to understand the interaction between air pollution and health inequities, and to address the disparities they produce."

The health concerns imposed by the addition of a fourth incinerator are made more significant because low-income communities and racially and ethnically diverse communities such as those surrounding the facility are historically under-engaged by the agencies and industries whose decisions impact them the most. Therefore, we pose the question as to whether the MPCA and MCES have implemented culturally-responsive community outreach strategies that go beyond traditional open houses. Culturally-responsive community outreach strategies may include but are not limited to:

1. Hiring a communications person or team that specializes in educating and engaging with local communities to be impacted, with an emphasis on engaging with low-income and racially and ethnically diverse communities;
2. Identifying the racial and linguistic demographics followed by direct mailing and/or targeted digital outreach in identified languages;
3. Distilling complex data into layman's terms followed by intentional publication and circulation of the materials, also made available in identified languages;
4. Directly engaging with organizations, district councils, and community leaders to facilitate deeper conversations;
5. Establishing long-term relationship building that precedes and extends beyond the periods of necessary engagement.

PFAS

Regarding per- and polyfluoroalkyl substances (PFAS) compounds, Page 23 of the EAW stated that the "level of PFAS in the wastewater recycle stream, and ultimately in the air, from the incineration process is currently unknown." However, "[i]f released into the air, they can impact soil, surface water and groundwater."

For context, the 180 million gallons of daily wastewater, which includes human excrements, toxic metals, hazardous chemicals, and industrial and commercial waste from 1.8 million residents from 66 communities flow into Saint Paul to be processed at this single location where it is burned, treated, and neutralized as best as possible. However, the incinerators

cannot reach a temperature hot enough to destroy PFAS. Although the facility is determined to not create additional PFAS, it is of incredible concern that the agencies are unaware of (1) how much PFAS may be in the wastewater, (2) how much is then emitted back into the air or river, and (3) the far-reaching effects of the PFAS unto nearby communities.

This enormous amount of wastewater flowing from across the metro area likely creates a significant amount of PFAS released into the air at this single location, resulting in discriminatory PFAS exposure.

Considering the financial projection that the fourth incinerator is expected to cost at least \$210 million with a subsequent renewal project that will cost \$30 million coupled with the lack of knowledge surrounding the facility's contribution of PFAS into the local environment, we request the change that this project await more research as to the effects and the amount of PFAS the incinerators both destroy and release into the air prior to permit approval.

Because the incinerators cannot destroy all PFAS from the solids, we also raise the question of whether the facility will be able to capture PFAS from the solids and transport them off site for destruction until more information is gathered and shared with the public. To move forward with another incinerator while remaining ignorant to the actual amount of PFAS released into the area is an act of environmental injustice that targets the surrounding communities and wildlife that live near the site.

Recommendations & Mitigation Strategies

As the addition of the fourth incinerator is expected to produce 25% more pollutants in incinerator emissions without knowledge of the spread of PFAS, MCES should implement mitigation strategies to protect the surrounding communities. These mitigation measures could include:

1. Ensuring that the community is adequately engaged in the site development and in the operational phases of the fourth incinerator, such that the fourth incinerator will transition from a supplementary function as the older incinerators are repaired to the final phase of simultaneous operation of all four incinerators, by
 - a. holding virtual and in-person informational sessions,
 - b. providing notice by mail to nearby residents and schools,
 - c. and hosting online information available in several languages;
2. Investing in technology and investigative research to evaluate PFAS discharge caused by the incinerators, measuring any disparities, and reporting that data to the public;
3. Requiring that the use of trucks importing waste from the four other locations use zero-emissions technology;
4. Fully or partially reimbursing schools, residences, nonprofit organizations, and park facilities for installing or updating indoor air filtration within a minimum 2-mile radius, as the EAW has acknowledged that there are several nearby parks, trails, schools, and recreational areas;
5. Requiring all trucks and trailers entering the site to be in compliance with all current air quality regulations;
6. Improving, protecting, and expanding green spaces, such as tree canopies, around the treatment facility and in nearby neighborhoods;
7. Making risk assessments available and understandable to the public, including but not limited to flood plans, sediment and erosion controls, regulation of emissions and more, as indicated in the EAW; and

8. Transparently disclosing all environmental impacts of the addition of the fourth incinerator in accessible ways.

Conclusion

In conclusion, Commissioners Xiong and Ortega recognize the need for an increase in wastewater solids processing capacity to accommodate a growing population. The addition of a fourth incinerator is the most affordable and convenient option, and residents trust that the fourth incinerator will “have no odors during construction or during operation,” as stated on Page 45 of the EAW.

However, there is a parallel need to promote and protect the health and wellbeing of vulnerable communities in the areas surrounding this site. The questions below are asked with intent to ensure that industries remain innovative and responsible for protecting the environment we all share. The questions reiterate those previously discussed and include additional inquiries.

1. Has the MPCA and MCES implemented culturally-responsive community outreach strategies that go beyond traditional open houses to discuss the need and implications of a fourth incinerator? If so, how?
2. Will the facility be able and willing to separate PFAS from the waste and transport them away from this treatment plant to be destroyed, transformed, or converted at another location outside of the metro area until more information is gathered and shared with the public? If no, why?
3. On Page 40, nitrogen oxide emissions were identified as one of four pollutants that exceed the significant impact level. Why are there no current plans or requirements via the Air Permit to install a urea or ammonia system for nitrogen oxides emissions control at the facility (see Page 31 of EAW)? Are emissions still at a safe level despite exceeding the significant impact level threshold?
4. Incineration at 1,375 degrees Fahrenheit is sufficient to destroy harmful bacteria, viruses, and other pathogens. Is it sufficient to destroy or capture pharmaceuticals and other chemicals of concern such as, but not limited to, PFAS in the solids? If not, what resolution will MCES implement to address this issue?
5. Met Council determined that adding anaerobic digesters followed by incineration was too expensive over incineration alone. Given that Met Council requires large amounts of energy to power Metro Transit and the extensive wastewater treatment system, was the value of captured biogas, which could be used to power Metro Transit buses using a carbon negative renewable fuel source, factored into the cost of the project?

Sincerely,



Commissioner Mai Chong Xiong (District 6)



Commissioner Rafael E. Ortega (District 5)

Air Quality

DESCRIPTION

Poor air quality can affect lung and heart health. Scientific studies have shown that exposure to poor air quality can lead to a sore throat, persistent cough, burning eyes, wheezing, shortness of breath or chest pain. Elevated pollution levels can also trigger asthma attacks, hospital admissions and emergency room visits, heart attacks, and premature death.¹

The Air Quality Index, or AQI, was developed by the U.S. Environmental Protection Agency (EPA) to provide a simple, uniform way to report daily air quality conditions. Minnesota AQI numbers are determined by hourly measurements of five pollutants: fine particles (PM_{2.5}), ground-level ozone (O₃), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), and carbon monoxide (CO). The pollutant with the highest AQI value determines the overall AQI for that hour; fine particles and ozone are the primary pollutants causing air alerts.²

The Minnesota Pollution Control Agency (MPCA) uses hourly air pollution monitoring results and daily air quality forecasts to determine whether air pollution concentrations have reached air quality alert levels. An air quality alert is issued when measured or forecasted air quality conditions are expected to result in an AQI of 101 or higher, meaning that adverse health effects can be expected for populations that are sensitive to air pollution.³

HOW WE ARE DOING

The number of good AQI days has been increasing over time while the number of moderate and higher days has been decreasing. The number of “unhealthy for sensitive groups” and “unhealthy” days is more variable, as it is driven by differences in weather conditions that affect air quality. Ramsey County in 2016 had two total “unhealthy” days. In the Twin Cities for 2015, there were seven alert days for AQI.

The number of AQI days in each category varies by region of the state. Typically, areas in the northern half of the state have the highest number of good days. The Twin Cities routinely has the fewest number of good days, due in part to the density of air pollution sources such as cars, trucks, homes, and industry in the metropolitan area.⁴

The number of air alert days per year across Minnesota has generally been declining over time (the slight increase noted for 2015 was primarily due to increased wildfire activity). On most days, air quality across Minnesota is healthy to breathe, but on some days each year the air can reach unhealthy levels.⁵

BENCHMARK INDICATOR

Healthy People 2020: Reduce the number of days the Air Quality Index (AQI) exceeds 100.

U.S. Target: 10% improvement.

DISPARITIES

Air pollution disproportionately impacts the health of some communities. Areas with higher concentrations of people living in poverty and people of color tend to experience higher levels of air pollution than those in predominantly white and higher-income areas, and are

¹ About air quality data. Health effects associated with poor air quality. Minnesota Pollution Control Agency. <https://www.pca.state.mn.us/air/about-air-quality-data>. Accessed January 16, 2018.

² About air quality data. AQI monitor locations. Minnesota Pollution Control Agency. <https://www.pca.state.mn.us/air/current-condition-details>. Accessed January 16, 2018.

³ About air quality data. Issuing Air Quality Alerts. Minnesota Pollution Control Agency. <https://www.pca.state.mn.us/air/about-air-quality-data>. Accessed January 16, 2018.

⁴ Annual AQI summary reports. Minnesota Pollution Control Agency. <https://www.pca.state.mn.us/air/annual-aqi-summary-reports>. Accessed January 16, 2018.

⁵ Air Quality Index: facts and figures. Minnesota Department of Health. https://apps.health.state.mn.us/mndata/air_aqi. Accessed January 16, 2018.

Information to note

- Overall, the number of good air quality days in Ramsey County is increasing.
- The Twin Cities routinely has the fewest number of good air quality days, compared to other regions of the state.
- An air quality alert is issued when the AQI exceeds 100.

Community voice

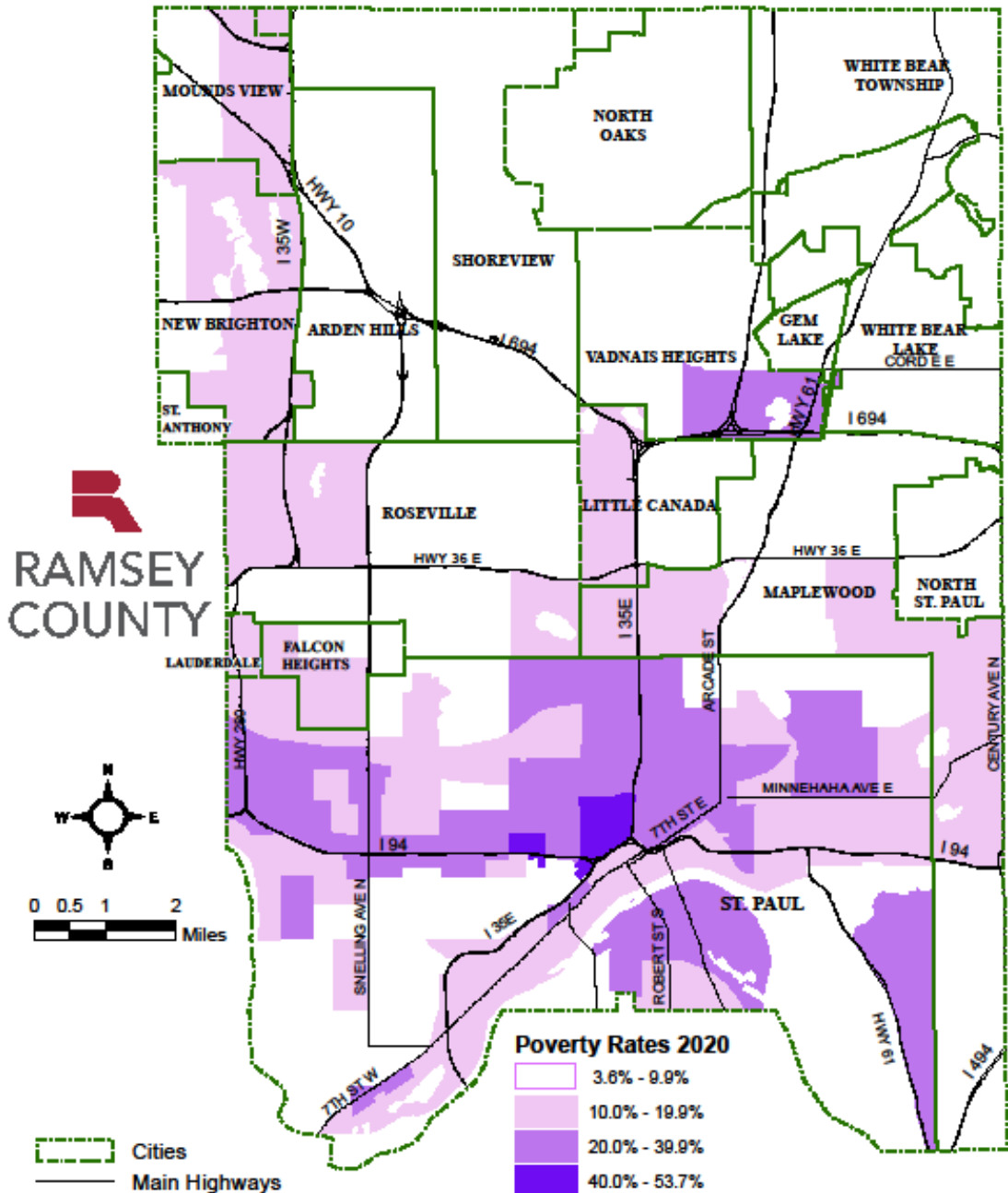
“Pollution in the air, smoking.”
- White Female, age 10-24

509 respondents mentioned the physical environment as a factor that influenced their health. Of these, 68 mentioned the adverse effects of air pollution.

Attachment B

Estimated Poverty Rates, 2016-2020 Average

US Census Bureau, American Community Survey, Displayed by Census Tracts



Prepared by Ramsey County Health & Wellness, Research and Evaluation; Source: US Census Bureau, <https://data.census.gov/>
S:\eval\GIS_files\Map Projects\Demographics\Poverty 2020.mxd Date Saved: 3/21/2022