



SIERRA CLUB

NORTH STAR CHAPTER

2300 Myrtle Avenue, Suite 260
Saint Paul, MN 55114
612-659-9124
sierraclub.org/minnesota

August 25, 2023

Minnesota Pollution Control Agency
c/o Katrina Hapka
520 Lafayette Road North
St. Paul, MN 55155
[Submitted via website](#)

Re: Met Council Wastewater Treatment Plant (St. Paul) - Environmental Assessment Worksheet

Dear Katrina Hapka,

Sierra Club Healthy Communities is an initiative within the Sierra Club to create meaningful and impactful relationships with frontline environmental justice communities and prioritize environmental justice within our own campaigns. Through partnership with the local Sierra Club North Star chapter, Healthy Communities has worked to complement the expertise and knowledge of communities directly-affected by pollution, displacement, or climate change with our engaged statewide membership and our legislative and regulatory work.

The Metropolitan Wastewater Treatment Plant is the largest wastewater treatment facility in Minnesota, serving all metropolitan counties. It also features three fluid bed incinerators which help break down waste and generate power for electricity. Metropolitan Council Environmental Services, who own the facility, want to expand the water treatment campus by adding a fourth fluid bed incinerator, and in order to do so they are required to amend their existing air permit. To be approved for this, they need to provide an adequate assessment of the health and environmental impacts of the proposal.

After review of the Environmental Assessment Worksheet, we believe the following needs to be addressed before the air permit is to be approved and that an EIS would be the most appropriate next step in the process.

Additional Processing Capacity

Metropolitan Council Environmental Services (MCES) says that the additional truck traffic from the fourth fluid bed incinerator will average about one truck per day, and that ash generated will increase over time. The Empire, Blue Lake, or Seneca plants will also send cake to the

Metropolitan Plant on an emergency backup basis. What constitutes an emergency and what is the limit before it is considered an excess at these plants?

Given the increase over time of diesel-powered vehicles, are there plans in place to decarbonize operations at the facility? What is the extent to which the Metropolitan Council is able to restrict the use of diesel-powered vehicles?

Environmental Justice

The Metropolitan Wastewater Treatment Plant is located at 2400 Childs Road in Saint Paul. The facility is adjacent to multiple environmental justice communities of Saint Paul, including multiple neighborhoods with a majority BIPOC, low-income, and renter populations.

The Metropolitan Council's recommendation for the addition of the fourth fluid bed incinerator is to accommodate population growth in the Twin Cities metro area. Given that population growth is projected in several Minnesota counties, and given the addition of a new cake receiving facility at the Metro Plant to receive backup sludge from other nearby treatment plants, what are the reasons that increasing capacity at this site is the best course of action? Were alternative facilities within the metropolitan area considered for modernization and why or why not?

The Metropolitan Plant is located on land adjacent to greenspaces which are currently being restored by indigenous-led efforts, such as Bruce Vento Nature Sanctuary/Wakáŋ Tipi and Pig's Eye Regional Park/Çhokáŋ Taŋka, as well as Indian Mounds Regional Park, a site sacred to the Dakota people. Metropolitan Council has provided support to these efforts in the past, and should continue to contribute to indigenous-led land restoration. We would like to see Metropolitan Council consult with indigenous groups about the best ways to continue supporting these necessary restitution projects.

PFAS

There is not adequate research available about the transmission of PFAS into the air during the incineration of wastewater containing PFAS¹. The Metropolitan Plant is listed as a likely source of PFAS² and is on the MPCA list of PFAS monitoring sites. The EAW does not describe in detail the MPCA's plan for monitoring PFAS either in water discharge or air emissions. []

Cumulative Impacts

The Cumulative Impact Assessment³ provided within the EAW showed that pollutants of concern were below National Ambient Air Quality Standards threshold. Still, MCES recommends to restrict the facility emissions when necessary to contain its contributions of PM10. We agree with this discretion and would like to request that the responsible agencies hold a public meeting on the cumulative impact analysis. This is to promote the informed

¹ <https://www.wwdmag.com/wastewater-treatment/article/10939565/destroying-pfas-in-sludge>

² <https://www.pca.state.mn.us/sites/default/files/p-gen1-22c.pdf>

³ <https://scs-public.s3-us-gov-west->

[1.amazonaws.com/env_production/oid333/did200071/pid_206675/project-documents/MPCA%20Final%20-%20MCES%20EAW.pdf](https://scs-public.s3-us-gov-west-1.amazonaws.com/env_production/oid333/did200071/pid_206675/project-documents/MPCA%20Final%20-%20MCES%20EAW.pdf)

participation of impacted communities and to ensure that the cumulative impact analysis can be effectively enforced.

Recycling and Re-use of Demolition Materials

The EAW says that it will evaluate the options for recycling demolition materials when possible. We would like to see future demolition and construction plans include what measures are being taken to recycle materials when possible.

We urge the Minnesota Pollution Control Agency to require an EIS which would allow for a comprehensive analysis of the impacts and concerns above, and include a transparent and robust public engagement process.

Thank you for the opportunity to comment.

Sincerely,

Margaret Levin
State Director
Sierra Club North Star Chapter

Dominique Diaddigo-Cash
Healthy Communities Senior Organizing Representative
Sierra Club