

# Lois Norrgard

## Comment Regarding: Metropolitan Wastewater Treatment Plant Solids Management Improvements Project Environmental Assessment (EA)

I am concerned about the proposal to expand the Metropolitan Wastewater Treatment Plant Solids Management Improvements Project (MWTP) which is in an incredibly wrong location to begin with. This plant is mere feet from Pigs Eye Lake, the Mississippi River, Mississippi National River and Recreation Area, and many other public parklands, as well as being adjacent to multiple environmental justice communities of Saint Paul, including multiple neighborhoods with a majority BIPOC, low-income, and renter populations.

Permit decisions and the siting of polluting facilities was not considering equity or justice when this plant was originally constructed in 1938. Even in 2005, when the solids management building (SMB) was constructed, and the facility was expanded, important science and statistics regarding the health and well-being of local communities was not taken into consideration. Today we must do better.

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?

When multiple sources of pollution and other destabilizing factors are in the same place, the added pollution of each facility leads to more negative impacts on the health and environment of the community. Polluters have treated certain communities as "sacrifice zones" for decades, purposefully polluting those communities instead of others. This has created and contributed to a number of disparities in health, environment, quality of life, and economic stability.

### Cumulative Impacts

Minnesota should ensure that the cumulative effects of pollution are incorporated into environmental permitting. This will ensure that Minnesota's regulatory process cannot continue forcing pollution on overburdened communities. The Minnesota Pollution Control Agency (MPCA) should deny permits for facilities that are causing or contributing to a substantial adverse impact to the health or environment of an environmental justice area unless a community benefit agreement is developed.

The Cumulative Impact Assessment provided with this EAW indicated that pollutants of concern were below the National Ambient Air Quality Standards threshold, but this is not a complete story – it is well known that for human health no amount of toxins are ok. Any increase in a community that is already being impacted by existing pollutants should not be allowed.

I am requesting that the responsible agencies hold a public meeting on the cumulative impact analysis. This is to promote the informed participation of impacted communities and to ensure that the cumulative impact analysis can be effectively enforced. This should be done in conjunction with the EIS analysis.

PFAS

There is not adequate research available about the transmission of PFAS into the air during the incineration of waste or wastewater containing PFAS. The MWTP is listed as a likely source of PFAS 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. This fact alone requires a hard look and further analysis before any permitting can move forward. I am requesting that an EIS is done for this project.

#### Minnesota's Environment

I am also concerned about the local natural public lands within this location, the endangered Rusty Patched Bumble Bee and other species of special concern that are found in close proximity to this project. I am concerned with additional pollution affecting the waters of the Mississippi River, Pig's Eye Lake and the many creeks and wetlands in this location.

It appears that a Rusty Patched Bumble Bee ground survey has not been done in this area for close to 10 years. It is imperative that up-to-date wildlife and plant life species of concern surveys be done – for which an EIS would allow the opportunity to do.

In conclusion, thank you for the opportunity to comment on this EA, and I appreciate consideration for my concerns. I request that the Minnesota Pollution Control Agency require an EIS as the next step in this process – with comprehensive analysis of the impacts to communities and the environment using the best available science. This must include community meetings and a transparent public involvement process.

Thank you,  
Lois Norrgard