

Nick Nelson

I am writing to voice my strong objection to this project moving forward until many more details are provided.

As you are well aware there is already a digester project in Le Sueur that could potentially be used to process these same materials.

What is MPCA's experience level with that facility? Did it meet or exceed all MPCA standards for air, water, waste streams, etc? What was the environmental impact of that facility?

What specific technologies are being used?

What are these technologies experience level at this scale not lab scale?

Who will be managing this very fragile biological process?

What is their experience level at this scale?

What are the plans for maintaining a stable biology with the mixed input stream?

Has MPCA audited the technologies and management team's sites for compliance levels acceptable at this location in Minnesota?

This area is very prone to high water levels when the Minnesota River floods what precautions are being implemented to ensure that none of these materials ever enter the already over polluted Minnesota and then Mississippi Rivers?

Anybody that has ever been near an anaerobic digester knows that they stink from the materials entering and leaving the plant. How is this going to be dealt with?

This type of system with mixed and unstable input is very prone to system upset. What is the plan for when that happens and it takes months to get the system back up and running again

What is the plan for the liquid digestate?

Why is this being located in a space where it needs ground water when it could be located next to a gray water supply source such as the Met Council's Blue Lake wastewater treatment plant? Or why is their gray water not being trucked over to this facility? We don't need to be using any more fresh ground water for facilities like this. We need to force cooperation of existing parties.

What impact on the other regional landfill facilities that are making landfill gas will this facility have?

It is true that per, pfas and other heavy metals don't get added during the process however we are talking about a concentrating of these items and then spreading them onto local fields where they

will become concentrated over time and when we get heavy rains they will flow into the Minnesota River. I urge MPCA to think about the long term effects of this project. The lack of a viable long term contract for the very widespread distribution of the biochar is a huge concern.

Because of the heavy metal content there would need to be safeguards put into place to ensure that no product ever grown on the lands that the biochar is spread on ever making it back into the human food chain via direct or indirect consumption of the product grown on that land. Meaning it can't be used for livestock feed and we need to make sure that it's impossible for it to enter the Minnesota river because of the use for drinking water down river and eventually shrimp and fishing when you get to the gulf. This is an especially massive concern with the level of vegetable crops grown in the region as well as the corn being used for livestock feed either before or after the ethanol process. I am just saying that there is a massive risk of these heavy metals getting concentrated and entering the human food stream.

All of this being said I have toured a waste to biogas facility in Sweden and thus I know about the issues that I am raising.

From 2008 to 2012 I owned an anaerobic digestion company and know how the process works and how fragile it is maintain especially with this waste stream. I know several facilities of this nature were in the works in the Ohio area in the 2010 to 2012 time frame. What is the operational history of those facilities?

I look foresee to hearing the team's answers to these and many more questions at the public meeting.