PETITION FOR ENVIRONMENTAL ASSESSMENT WORKSHEET

Petitioners' Representative: Nancy Hone, Neighbors Against the Burner, 2098 Carroll Ave., St. Paul, MN 55104 651-647-9908
Project Proposers: Kandiyohi Development Partners
Project Description: Generate 24.5MW of electricity and heat for large buildings located elsewhere in south Minneapolis.

We, the undersigned, under Minn. R. 4410.1100, Petition the Environmental Quality Board, and ask that an Environmental Assessment Worksheet be completed regarding Kandiyohi Development Partners' Midtown Eco-Energy waste wood burner (hereinafter Midtown), The project, as proposed, presents many environmental impacts, including release of approximately one million pounds of regulated pollutant emissions annually. Under Minnesota Rule 4410.4300, Subp. 3, an EAW is mandatory because the project is a combined heat and power project, where the project's 24.5 MW of electrical generation and additional thermal output exceeds the threshold for a mandatory EAW. Midtown does not fall under exempted projects. Due to the impacts of the project, Midtown should also be subject to a discretionary EAW. Minn.R. 4410.4500. The project's nature and impacts of concern are: Emissions of nearly 1 million pounds of pollutants, including arsenic, carbon tetrachloride, benzene, beryllium, cadmium, chromium, nickel, vinyl chloride and styrene; cumulative impact of dispersion of pollutants over an area generally contaminated and containing specific "hot spot" sites; the project would emit 14,000 lbs. of formaldehyde annually adding to unacceptable formaldehyde levels and additional emissions should not be permitted; according to Technical Support Document, MPCA has insufficient data to determine entire smokestack emissions; MPCA has deceptively utilized an 800 ft "truck trip" to determine additional traffic emissions directly attributable to Midtown; the location is unsuitable due to disproportionate impacts to an ethnically and racially diverse and poor neighborhood, proximity to many schools and day care facilities and numerous community gardens; lack of community benefits and existence of community detriments of pollution, environmental injustice, exemption from utility personal property tax revenue to county, city and school district and nominal job creation for community residents. Issuance of MPCA's Air Permit, as proposed, is in violation of Executive Order 12898 regarding impacts to minority and low-income populations; violation of Executive Order 12250 regarding discriminatory practices by Minnesota in implementing federal air policy with federal financial assistance; the U.S. Civil Rights Act of 1964; and the MPCA "Environmental Policy." This project also should be subject to an EAW as one receiving state and federal economic assistance. Minn.R. 4410.0200, Subp. 58. We ask that the EQB accept and refer this Petition and supporting material evidence to the appropriate RGU and an Environmental Assessment Worksheet be ordered.

Signature	Print Name	Street address, City, State and Zip Code