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Ms. Kimberly Holien, City Planner
City of Minneapolis
Members of the Planning Commission

Regarding: Request to modify conditional use permit #61061 (Increased garbage burning at HERC from 1000 tons per day to 1212 tons per day).

Dear Ms. Holien:

Please enter this letter with attachments into the record and provide copies to the Commissioners.

I urge the City not to grant the requested change.

My analysis of 17 years of MPCA emissions inventory data for the HERC shows average annual emissions of regulated air pollutants of about 1.4 million pounds per year. Since emissions of such a facility are in proportion to the amount burned, the requested increase of 21.2 percent implies an increase in actual emissions of about 292 thousand pounds per year or 800 pounds per day.

Supporting this, a “side by side comparison” of “Permitted emissions” found in the Technical Support Document for permit [5300400-001](#) indicates an increase in permitted emissions of 434 thousand pounds per year or 1191 pounds per day.

Details are in the attached spreadsheet.

These increases may or many not cause violations of air quality standards. However, there is in general “no safe level” of air pollutants. Increased air pollutants will cause increases in asthma, bronchitis, cancer, heart disease, and other health problems.

I include herein by reference the report:

[The Health Effects of Waste Incinerators](#) by the British Society for Ecological Medicine (http://www.ecomed.org.uk/content/IncineratorReport_v3.pdf).

At the same time a stadium is being built next to the HERC, inevitably increasing human exposure to air pollutants from the incinerator.

From this I conclude that the proposed increase would be inconsistent with the primary responsibility of the City government to protect the health and quality of life of its residents. To put this another way, the proposed change cannot meet the criteria of:

"1. Will not be detrimental to or endanger the public health, safety, comfort or general welfare."

The final report of the Minnesota Climate Change Advisory Group (<http://www.mnclimatechange.us/ewebeditpro/items/O3F16697.pdf>) found increases in recycling to be far more cost effective than incineration both in dollars and reduction of carbon equivalent emissions.

"The recommendations for AFW-7 represent a significant change from BAU waste management in the State: for source reduction, the goal is to achieve 0% increase in waste generation per capita by 2020 and a reduction of 3% in waste generation per capita by 2025;⁵ for recycling, a 50% recycling rate should be achieved by 2011 and a 60% recycling rate by 2025;⁶ and for composting, a rate of 10% by 2012 and 15% by 2020.⁷ The recycling and composting elements achieve a total of 75% diversion of waste from landfilling or waste to energy (WTE) by 2025. The combined front-end waste management elements produce substantial GHG savings of 7.4 MMtCO_{2e} in 2025"

Given these conclusions, increasing incineration would be incompatible with Minneapolis' declared intention to be a "green" city.

Regarding state waste policy:

The Minnesota Pollution Control Agency (MPCA) has contracted with the Minnesota Environmental Initiative (MEI) to design, lead and facilitate a stakeholder process to develop strategies to achieve greenhouse gas reduction, energy conservation and environmental protection through integrated solid waste management. The stakeholder process stems from the 2007 MPCA Solid Waste Policy Report to the Minnesota Legislature that adopts a recommendation to convene a stakeholder group to develop strategies that can help reach the Minnesota Climate Change Advisory Group (MCCAG) greenhouse gas reduction targets for the solid waste sector. (<http://www.mn-ei.org/projects/solidwaste.htm>)

This stakeholder process, originally scheduled to conclude in June, has been extended and will resume in the fall. It would be untimely for Minneapolis to act to increase incineration pending the conclusions of this process.

Finally, the June 1, 2009 support letter from the North Loop Neighborhood Association states:

“The NLNA Is in favor of a 10% increase in HERC’s processing capabilities, contingent on the fact that the level of emissions do not go above what they are recorded at today.”

This suggests that the NLNA was not aware that (1) the proposed increase is 21%, not 10%, and (2) emissions inevitably would increase. It is reasonable to suspect that the NLNA was misinformed, and/or failed to independently verify the facts before taking a position. This organization should be given an opportunity to revisit its position.

Obviously there are many aspects of the situation outside the scope of this letter.

Respectfully submitted,

Alan Muller

Attachment: spreadsheet HERC.xls

year	Summary of emissions				
	CO	PB	Nox	PM-10	SO2
1990	709720	5800	1166640	90840	87560
1991	92000	100	644000	43480	28000
1992	60200		550200	8700	25600
1993	74040	20	596660	34480	37600
1994		40			
1995	77060	16100	573900	60520	48720
1996	135200	92	1265200	16820	59000
1997		60			
1998					
1999	192543	46	1192333	84866	93205
2000	134953	19	857725	51289	52893
2001		100			
2002	130433	22	862146	33580	27545
permit number	application date	"effective date"		expiration date	
2125-87-OT-1		1/27/1987			
<u>5300400-001</u>	4/1/1995	5/14/1998		143 pages	
<u>5300400-002</u>		6/7/2002		5/14/2003 129 pages	
<u>5300400-003</u>		9/10/2004		5/14/2003 55 pages	

From tech support document for -001
 "emissions calculations" page 7:
 a comparison between "Federal PTE" and "State-only limits"
 is representative of the changes associated with removing
 the "state only" 1000 ton/day limit.
 limits increase for total particulate matter, dioxins, hydrogen chloride,
 carbon monoxide, nitrogen oxides, mercury, lead, and cadmium.

total increase 217.3 tons/year 1190.68 pounds/year 1191 pound/day