



Minnesota Pollution Control Agency

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July 20, 2016

Mr. Kane Flett
Director of Business Development
Lab USA Corporation
130 East Walnut Street, Suite 903
Green Bay, WI. 54301

RE: Permit Application
Lab USA's Ash Processing Facility – Red Wing
Solid Waste Permit Number SW-670

Dear Mr. Flett:

The Minnesota Pollution Control Agency (MPCA) received a permit application for the Lab USA Ash Processing Facility – Red Wing, SW-670, from your consultant, SEH, on June 20, 2016. Following are comments related to the technical review of the document:

1. Comments on the completeness review were emailed to you on June 29, 2016. Although the application was considered substantially complete, I requested that documentation be submitted which verifies that you and the landowner, Mr. Rosvold (with Xcel Energy) were duly authorized agents by an executive in the corporation to sign the permit application and any other documents related to the facility. Since then, I have received the appropriated documentation from Xcel Energy. Please submit the documentation for Lab USA.
2. Section I in the Permit Application for Construction and Operation of a Solid Waste Facility indicates that all local permits and approvals will be obtained following the completion of a discretionary environmental assessment worksheet (EAW). The MPCA plans to prepare a dual public notice for the EAW and draft solid waste permit. MPCA will have to wait to issue the solid waste permit until all local permits and approvals are obtained first.
3. Design Report – Sections 1.1, 1.3, 3.1.2, and several other sections indicate that the processing facility will receive combustor ash from the Xcel Energy's Red Wing Generating Plant, the Xcel Energy's Red Wing Ash Disposal Facility (SW-307), and from the Red Wing Land Disposal Facility (SW-174). The MPCA has received associated information from Xcel Energy to modify their operations to incorporate the processing activities at their landfill. However, to date, the MPCA has not received a request to modify the City of Red Wing's permit for this activity change at their landfill. The City of Red Wing permit modification request, or the status of submitting the permit modification, must be submitted prior to the start of the public notice for the Lab USA Ash Processing Facility, so that I can accurately reflect the operations of the facility in the public notice.
4. Design Report – Sections 2.1 and 3.1.2: The cubic yard volume of ash expected to be processed annually is noted as 150,000 cubic yard. The associated volume is calculated with an assumed density of 2000 pounds/cubic yard (i.e. one-cubic yard per ton). The MPCA has typically used an assumed density of 1.1 cubic yard per ton. The permit will identify both an annual volume and an equivalent weight to be processed annually. If I use 1.1 cubic yard per ton, then the facility will be approved to process 136,363 tons. How will the landfills track the amount of material they extract

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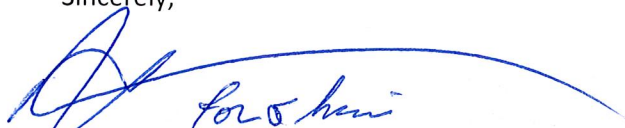
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and bring to the processing facility? Is there a scale they will use before and after the processing is done? Will the volume and weight of ash coming from the Generating Plant be measured; most landfills measure a weight when the material is received at the landfill, but the quantity is calculated as a volume at the transfer station. Please describe how the quantities of ash being processed to and from the landfills and Generating Plant will be measured, as well as how the scrap iron will be measured, and the daily volume of 600 tons per day will be tracked and measured.

5. Design Report – Section 2.1: The expected waste type is indicated as combustor ash (incidental municipal solid waste (MSW) fines). Is the incidental MSW fines just referring to what is already deposited in the City of Red Wing's combustor ash landfill, and does not refer to new material being brought from their material recovery facility?
6. Design Report – Appendix E, and Sheet C300: When will the city finalize the design of the stormwater pond? Please submit this additional information when it is complete. Please update C300 to illustrate the path that the pond outfall will take until it reaches Bench Street (with topo lines). The report indicates that the pond will have a minimum volume that is greater than 1,800 cubic feet per acre drained, but it doesn't indicate what the design number is for the pond. Please provide the volume of the pond (i.e. cubic feet per acre drained).
7. Design Report – Appendix F, and Sheet C300: Appendix C in the Subsurface Investigation Report illustrates a concrete retaining wall on the south and west side of the facility. Sheet C300 illustrates a stormwater diversion berm, on the south side of the building, up the slope to prevent surface water run on. Please clarify and/or update Sheet C300 and any other design sheets to include the concrete retaining wall. What is the function of the wall, as I do not see it described in the design report.
6. Operations and Maintenance Plan – Section 5.0: Please submit a cost estimate of the total cost associated with closure activities for the processing facility.

If you have any questions or comments, please contact me at 507-206-2600.

Sincerely,



Sherri M. Nachtigal, P.E.

Principal Engineer

Prevention & Solid Waste Management Section

Resource Management & Assistance Division

SMN:jw

cc: Jeffrey L. West, Sr. Director Environmental Services
Manual Castillo, Xcel Energy
Rick Moskwa, City of Red Wing
Daryl Heaps, SEH
Kevin Kain, MPCA
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