September 13, 2002

TO: INTERESTED PARTIES

RE: Waste Management – St. Paul Transfer Facility

Enclosed is the Environmental Assessment Worksheet (EAW) for the proposed Waste Management – St. Paul Transfer Facility, Ramsey County. The EAW was prepared by the Minnesota Pollution Control Agency (MPCA) and is being distributed for a 30-day review and comment period pursuant to the Environmental Quality Board (EQB) rules. The comment period will begin the day the EAW availability notice is published in the EQB Monitor, which will likely occur in the September 16, 2002, issue. The MPCA's Draft Solid Waste Permit for the Waste Management – St. Paul Transfer Facility will also be on public notice the week of September 16, 2002. To obtain a copy of the Draft Solid Waste Permit please contact Jess Richards at the MPCA at (651) 282-9885.

Comments received on the EAW will be used by the MPCA in evaluating the potential for significant environmental effects from this project and deciding on the need for an Environmental Impact Statement (EIS).

A final decision on the need for an EIS will be made by the MPCA Commissioner after the end of the comment period. If a request for an EIS is received during the comment period, or if the Commissioner recommends the preparation of an EIS, the nine-member MPCA Citizens' Board (Board) will make the final decision. The final EIS need decision will also be made by the Board if so requested by the project proposer, other interested parties or MPCA staff and if this request is agreed to by one or more members of the Board or the MPCA Commissioner. The Board meets once a month, usually the fourth Tuesday of each month, at the MPCA office in St. Paul. Meetings are open to the public and interested persons may offer testimony on Board agenda items. A listing of Board members is available on request by calling (651) 296-7306.

Please note that comment letters submitted to the MPCA do become public documents and will be part of the official public record for this project.

If you have any questions on the EAW, please contact Kevin Kain of my staff at (651) 296-7432.

Sincerely,

Beth G. Lockwood
Supervisor, Environmental Review Unit
Operations and Environmental Review Section
Regional Environmental Management Division

BGL:sjs

Enclosure

ENVIRONMENTAL ASSESSMENT WORKSHEET

Note to reviewers: The Environmental Assessment Worksheet (EAW) provides information about a Site that may have the potential for significant environmental effects. This EAW was prepared by the Minnesota Pollution Control Agency (MPCA), acting as the Responsible Governmental Unit (RGU), to determine whether an Environmental Impact Statement (EIS) should be prepared. The Site proposer supplied reasonably accessible data for, but did not complete the final worksheet. Comments on the EAW must be submitted to the MPCA during the 30-day comment period which begins with notice of the availability of the EAW in the *Minnesota Environmental Quality Board (EQB) Monitor*. Comments on the EAW should address the accuracy and completeness of information, potential impacts that are reasonably expected to occur that warrant further investigation, and the need for an EIS. A copy of the EAW may be obtained from the MPCA by calling (651) 296-7398. An electronic version of the completed EAW is available at the MPCA Web site http://www.pca.state.mn.us/news/eaw/index.html#open-eaw.

1. Site Title: Waste Management – St. Paul Transfer Facility.

2. Proposer: Waste Management of Minnesota Inc.

Contact Person John Kellas

and Title Area Manager Landfills

Address 22460 Hwy. 169 NW

Elk River, MN 55330

Phone (763) 441- 2464

Fax (763) 441 – 3171

3. RGU: Minnesota Pollution Control Agency

Contact Person Kevin J. Kain

and Title Site Manager for MPCA

Address 520 Lafayette Road North

St. Paul, Minnesota 55155

Phone (651) 296-7432

Fax (651) 296 – 7782

4. Reason for EAW Preparation:

EIS Scoping	Mandatory EAW	Citizen Petition	RGU Discretion	Proposer Volunteered
___	X	___	___	___

If EAW or EIS is mandatory give EQB rule category subpart number and name: Minn. R. 4410.4300 subp. 17. C.

For construction or expansion of a mixed municipal solid waste transfer station for 300,000 or more cubic yards per year.

5. Site Location: County Ramsey City/Twp St. Paul

¼	SW	¼	Section	29	Township	29N	Range	22W
¼	SE	¼	Section	30	Township	29N	Range	22W

Exhibits attached to the EAW:

Exhibit 1 State map;
Exhibit 2 City map;
Exhibit 3 Aerial Photo indicating existing conditions;
Exhibit 4 Proposed facility layout;
Exhibit 5 Traffic flow patterns;
Exhibit 6 Department of Natural Resources (DNR) letter dated October 25, 2001; and
Exhibit 7 Minnesota Historical Society (MHS) letter dated November 7, 2001.

6. Description:

a. Provide a Site summary of 50 words or less to be published in the *EQB Monitor.*

Waste Management of St. Paul is proposing to construct a solid waste transfer station located at 195 Minnehaha Avenue East, St. Paul. The new transfer station would be designed to handle 148,850 tons per year (TPY) or approximately 446,000 cubic yards per year. The MPCA's Draft Solid Waste Permit for the Waste Management – St. Paul Transfer Facility will also be on public notice the week of September 16, 2002. To obtain a copy of the Draft Solid Waste Permit please contact Jess Richards at the MPCA at (651) 282-9885.

b. Give a complete description of the proposed Site and related new construction. Attach additional sheets as necessary. Emphasize construction, operation methods and features that would cause physical manipulation of the environment or would produce wastes. Include modifications to existing equipment or industrial processes and significant demolition, removal or remodeling of existing structures. Indicate the timing and duration of construction activities.

Waste Management of Minnesota, Inc. (Waste Management) proposes to operate a new Solid Waste Transfer Station (SWTF) at 195 Minnehaha Avenue East, St. Paul (Site) and close its current operation at 800 Westminster Street in St. Paul, Minnesota. The property at 800 Westminster would be utilized as an industrial park for new business as part of the city of St. Paul's (City) Phalen Corridor initiative.

The existing recycling center at the Site would be closed, and recyclable materials currently received at this recycling center would be routed instead to a Waste Management recycling facility currently under construction in Minneapolis. Waste Management has stated that closing of its operations at the Site would not diminish its ability to receive and process recyclable materials in the Twin Cities.

Proposed SWTF Operating Capacity

Waste Management is requesting a throughput capacity of up to 148,850 TPY or 446,000 cubic yards per year of mixed municipal solid waste (MSW), non-hazardous industrial wastes, and construction and demolition debris wastes (C&D), based on assumed waste density of 667 pounds per cubic yard.

The operating permit application submitted to the MPCA includes a commitment to close Waste Management's 800 Westminster Street Solid Waste Transfer Station, currently serving the City area. The existing Solid Waste Transfer Station at 800 Westminster Street is permitted to receive up to 99,350 TPY of solid waste.

Waste Management previously proposed to construct and open the Dakota Resource Transfer Station in Inver Grove Heights, Minnesota to serve the Dakota County area with a proposed permitted capacity in 2002 of 49,500 TPY. Waste Management plans to withdraw the application for the Dakota Resource Transfer Station if this Site is approved.

Proposed SWTF Structure and Improvements

The proposed SWTF would be situated within the existing building at the Site. The existing recycling center property and structures would be modified to a limited degree to accommodate the proposed SWTF. In general, the modifications to the recycling center property would consist of:

- One cut, (approximately four feet deep and 16 feet wide) in the existing concrete floor for the length of the building in an east to west direction. This would serve as a drive-thru lane and loading area for the transfer trailers. Two overhead doors (one on the east end and one on the west end) would also be added to allow transfer trailers to enter and exit the building.
- One ramp, constructed on the east end of the building so that recycling vehicles and roll-off containers may enter and exit through the existing loading dock doors. Private citizens delivering waste would also enter and exit through these doors.
- Concrete push walls (either permanent or temporary), placed within the building to allow for safe and efficient traffic flow, and to separate the MSW tipping area from the C&D tipping area.
- A landscaping plan, which increases the existing landscaped area of the property. A landscaping plan has been submitted to the City as part of the rezoning application.

All construction activities would be documented, and a construction documentation report would be submitted to the MPCA.

Proposed SWTF Operating Plan

Operations of the proposed SWTF would be in a totally enclosed building. Operations are expected to begin as soon as all required permits are obtained.

Hours of Operation

The SWTF would be open for receiving wastes from 6:00 a.m. until 5:00 p.m. Monday through Friday, and 8:00 a.m. to 2:00 p.m. on Saturdays. SWTF vehicles would be unloaded only if an operator and all other personnel necessary to carry out operations in conformance with the facility permit are present. A trained operator would be on duty at all times the SWTF is open. However, the operator may close the proposed SWTF earlier where weather or volumes received warrant temporarily discontinuing SWTF operations.

Work activities, such as loading trailers, vehicle maintenance, and snow plowing may take place beyond the waste receiving hours. Loading and transfer operations may be conducted within the building for an additional 2 to 4 hours each day.

If necessary, under emergency conditions and on Saturdays and after Holidays, operating hours may be extended occasionally for receiving wastes. Such operation extensions would only occur if operators and all other personnel necessary to carry out operations in conformance with the proposed SWTF permit were present.

Access/Egress
Waste collection trucks would enter the proposed SWTF from Pennsylvania Avenue via L'orient Street. The entrance gate and building would be locked during all non-operating hours. Access would therefore be denied when the SWTF is closed.

Trucks would be unloaded inside the SWTF where solid waste can be sorted and reloaded for transfer to a landfill or waste processing facility. All waste transfer operations would be conducted inside the building.

Facility Equipment
Waste collection and transferring equipment would be installed and constructed inside the building. Equipment used routinely at the SWTF would include the following (or its equivalent):

- Transfer trailers (110 cubic yard capacity);
- Front-end loaders;
- Semi tractors;
- Roll-off boxes and dumpsters; and
- Trackhoe excavator with grapple.

Front-end loaders would be used indoors to transfer solid waste into semi-tractor trailers. All materials would be kept in the tipping floor area and/or containerized, unless they are being loaded or unloaded. Additional equipment is available from other Waste Management facilities or can be rented or purchased, if needed, to appropriately handle received wastes.

c. Explain the Site purpose; if the Site would be carried out by a governmental unit, explain the need for the Site and identify its beneficiaries.

The primary goal of the SWTF is to comply with the City's *Comprehensive Land Use Plan's* goals for land use in the Phalen Corridor without decreasing Waste Management's capacity for solid waste management in the East Metro area. The secondary goal for the SWTF is for Waste Management to improve the efficiency and effectiveness of its efforts to manage solid waste, including recyclable materials for all Twin Cities communities.

Waste Management would achieve these goals by establishing a SWTF with operational capacity that sufficiently replaces two existing Waste Management Solid Waste Transfer Stations serving the East Metro area. The two facilities to be closed are the Bellaire Transfer Station in Stillwater and the transfer station at 800 Westminster Street in St. Paul. In addition, Waste Management would not construct the proposed Dakota Resource Transfer Station in Inver Grove Heights. The closure of these two facilities is dependent upon issuance of all applicable governmental authorizations for this proposed new SWTF.

d. Are future stages of this development including development on any outlots planned or likely to happen? ☐Yes ☒No
If yes, briefly describe future stages, relationship to present Site, timeline and plans for environmental review.

e. Is this Site a subsequent stage of an earlier Site? ☐ Yes ☒ No
If yes, briefly describe the past development, timeline and any past environmental review.

The existing recycling center at the Site would be closed and the existing recycling center property and structures would be modified to a limited degree to accommodate the proposed SWTF. No environmental review was done on the existing recycling center.

7. Site Magnitude Data

Total Site Area (acres) 5.4 or Length (miles) NA
Number of Residential Units: Unattached 0 Attached 0 maximum units per building NA
Commercial/Industrial/Institutional Building Area (gross floor space): total square feet 44,800
Indicate area of specific uses (in square feet):

Office	3,200	Manufacturing	0
Retail	0	Other Industrial	0
Warehouse	0	Institutional	0
Light Industrial	41,600	Agricultural	0
Other Commercial (specify)	0		

Building height 30 If over 2 stories, compare to heights of nearby buildings

8. Permits and approvals required. List all known local, state and federal permits, approvals and financial assistance for the Site. Include modifications of any existing permits, governmental review of plans, and all direct and indirect forms of public financial assistance including bond guarantees, Tax Increment Financing and infrastructure.

Unit of Government	Type of Application	Status
MPCA	Solid Waste Transfer Facility Permit	Pending
MPCA	Closure Approval of the Waste Transfer Facility at 800 Westminster Street	Pending
MPCA	National Pollutant Discharge Elimination System (NPDES) General Storm Water Permit for Industrial Activity	Pending
Minnesota Office of Environmental Assistance (MOEA)	Regional Solid Waste Management Certificate of Need	Approved
Ramsey County	Operating Permit for Large Mixed Waste Transfer Station	Pending
Ramsey County	Closure Approval of the Waste Transfer Station at 800 Westminster Street	Pending
Ramsey County	Closure Approval of the Recycling Center at 195 Minnehaha Avenue East	Pending
Ramsey County	Very Small Quantity Generator Hazardous Waste License	Pending
City of St. Paul	Zoning Amendment	Pending
City of St. Paul	City License to Operate Waste Transfer Facility	Pending
City of St. Paul	Electrical, Plumbing Permits	Pending
City of St. Paul	Public Works Sewer Division Sewer Connection Permit	Pending

Unit of Government	Type of Application	Status

City of St. Paul	Fire Inspector Occupancy Approval	Pending

9. Land use. Describe current and recent past land use and development on the site and on adjacent lands. Discuss Site compatibility with adjacent and nearby land uses. Indicate whether any potential conflicts involve environmental matters. Identify any potential environmental hazards due to past site uses, such as soil contamination or abandoned storage tanks, or proximity to nearby hazardous liquid or gas pipelines.

The Site is located within an old industrial area developed on property previously used by the Great Northern, and other railroads, as rail bed and for manufacturing, maintenance, and repair facilities. Land within the railroad corridor, including and proximate to the Site, has been the subject of industrial redevelopment in St. Paul, including both the Williams Hill and the Empire Builder industrial parks.

Other notable cultural features located near the Site include the State Capitol and the Capitol Area Building Complex (3,500 feet southwest), the Oakland Cemetery (1,000 feet northwest), McDonough Homes (approximately 2,000 feet south) and the Cayuga residential area located to the north.

Waste Management is currently operating a recycling center at the Site, which would be replaced by the SWTF.

The Site is bounded by Interstate Highway 35E to the east; by residences and a salvage yard to the south; by the Minnesota Department of Transportation Railroad Museum (considered industrial use property) to the west; and by a railroad, residences, and small businesses to the north.

The Site is comprised of approximately 5.4 acres, which are zoned for industrial land use (both I-1 and I-2). An application has been prepared and submitted to the City to re-zone the I-1 portion of the property to I-2 to permit the use of the entire property as a SWTF. The zoning of the property, and of most of the adjacent properties, is industrial. Zoning is discussed in further detail in Item 27 of this EAW (below).

A limited environmental investigation of the Site was conducted in 1995 that included sampling soil and groundwater. Also, a limited soil and groundwater investigation of the nearby Minnesota Railroad Transportation Museum property was conducted in 1989. Some elevated levels of industrial chemicals were identified in the soil and groundwater at these two properties (described below). There are no other known environmental hazards present at the Site due to past property uses.

1995 Investigation

The 1995 investigation of the Site included collection and analyses of two soil samples from a point beneath the building floor, in an area of the building suspected of being used historically as a rail car servicing bay. Field screening soils from these two sampling points did not indicate the presence of volatile organic compounds (VOC). Analyses of the soil samples yielded no indication of the presence of VOCs. However, laboratory analyses did indicate the presence of diesel range organics (DRO) and polynuclear aromatic hydrocarbons (PAH) in both soil samples. The DRO's were present at a concentration equivalent to 13 parts per million (ppm).

The 1995 investigation included collection and analyses of groundwater from three locations at the Site. Groundwater was detected at the property at elevations ranging between 41 feet and 50 feet below ground surface (BGS).

Chloroform was detected in two groundwater samples at concentrations of 17.7 parts per billion (ppb) and 20.9 ppb, respectively. Dibromomethane was detected in one groundwater sample at a concentration of 3.0 ppb. The conclusion of the investigation report, with respect to groundwater, was that contaminants were identified at the Site at concentrations below established health risk criteria, that these

contaminants do not have an apparent on-site source, and that they are of limited concern to future on-site operations (presumably recycling center operations).

The investigation report concluded that contaminants identified at the Site do not indicate gross contamination of the entire property. No environmental remediation was conducted as a result of the 1995 investigation.

Earth moving activities for the SWTF are not anticipated to extend vertically to the groundwater table. Since operation of the SWTF is not inconsistent with recycling center operations, and since Site operations do not include groundwater procurement, the conclusions of this 1995 investigation appear to be germane to the SWTF as well.

However, the results of the 1995 investigation suggest that earth-moving activities conducted during modification of the building and property (to suit it for use as a SWTF) should include soil monitoring. Soils determined during construction activities to contain contaminants above threshold cleanup concentrations would be managed in accordance with MPCA procedures and disposed of appropriately at an off-site facility permitted to receive such soil/contaminant mixtures. This matter is not anticipated to be an environmental concern once re-grading and building modifications are completed.

Nearby 1989 Investigation

A 1989 limited soil and groundwater investigation at the Minnesota Railroad Transportation Museum property also identified elevated levels of industrial chemicals. Groundwater was encountered at the museum property at 16 feet BGS.

The results of the 1989 investigation indicate that VOCs were present in soils at the museum property at a depth of 2.0 feet BGS through 22.5 feet BGS; xylenes were present at the museum property in concentrations ranging from 1.7 to 2.7 ppm; and that hydrocarbons and PAHs were present in the groundwater at the museum property at concentrations ranging from 2 ppb to 12 ppm. Also detected in the ground water were 2- methylnaphthalene and 1- methylnaphthalene at concentrations of 67 micrograms per liter and 81 micrograms per liter respectively. The sum of these two compounds (148) exceeded the Minnesota Department of Health's 1988 recommended allowable limits of total non-carcinogenic total maximum allowed of 0.28 micrograms per liter for private drinking water supplies. The 1989 investigation report recommended a remedial investigation of the museum property. The results of this 1989 investigation do not indicate the presence of any incompatibilities or conflicts with the SWTF Site.

10. Cover Types. Estimate the acreage of the site with each of the following cover types before and after development:

	Before	After		Before	After
Types 1-8 wetlands	0	0	Lawn/landscaping	0.3	0.7
Wooded/forest	0	0	Impervious Surfaces	4.1	4.1
Brush/grassland	0	0	Other (describe)	1.0	0.6
Cropland	0	0			
			TOTAL	5.4	5.4

Impervious surfaces include the 44,800 square feet building: a platform scale south of the building, two concrete receptacles currently used for outdoor storage of recyclable materials, and bituminous paved driveway and parking. The "Other" category in the above table represents packed gravel areas that are neither impervious nor landscaped.

11. Fish, Wildlife, and Ecologically Sensitive Resources.

a. Identify fish and wildlife resources and habitats on or near the site and describe how they would be affected by the Site. Describe any measures to be taken to minimize or avoid impacts.

The Site is currently completely developed for industrial use and is therefore considered a disturbed property with regards to fish, wildlife, and native habitat. There are no fish resources or fish habitats on or near the Site.

A total of 0.3 acres of the Site is landscaped with lawn grass and shrubs along Minnehaha Avenue, and therefore does represent some limited wildlife habitat for some species. This grassy area is considered to exhibit limited wildlife habitat value as occasional limited grazing area for birds and small mammals. Shrubs on the Site exhibit limited value potential as bird resting/roosting habitat.

Waste Management plans to more than double the landscaped area at the Site. The landscaping plan includes the addition of more than 0.4 acres of trees, shrubs, prairie grasses, and prairie forbs. The additional vegetation would be installed adjacent to the existing line of shrubs on the west end of the Site and immediately adjacent to the building.

Trees near the Site should not be affected by either the construction or operations of the SWTF. It is possible, however, that some of the existing shrubs or trees at the SWTF may be damaged during construction activities. Any existing shrubs or trees that are impacted by construction activities would be restored or replaced with at least the same number of trees, and the species of replacement trees would be of equal or higher value to area wildlife species.

b. Are any state (endangered or threatened) species, rare plant communities or other sensitive ecological resources such as native prairie habitat, colonial waterbird nesting colonies or regionally rare plant communities on or near the site? ☒ Yes ☐ No
If yes, describe the resource and how it would be affected by the Site. Indicate if a site survey of the resources has been conducted and describe the results. If the DNR Natural Heritage and Nongame Research program has been contacted give the correspondence reference number. ERDB 20020321
Describe measures to minimize or avoid adverse impacts.

The Minnesota Department of Natural Resources (DNR) identified two records of rare species or natural communities within an approximate one-mile radius of the area of the two properties identified in this EAW. One record was of a peregrine falcon sighted in 1992 on the North Central Life Building in Section 31. The other record was of a North American jumping spider (Minnesota *Species of Concern*) sighted in 1978 in a park near the St. Paul Ramsey Hospital in Section 31. However, the Minnesota DNR has concluded that the SWTF would not affect any known occurrences or rare features.

12. Physical Impacts on Water Resources. Would the Site involve the physical or hydrologic alteration (dredging, filling, stream diversion, outfall structure, diking, and impoundment) of any surface waters such as a lake, pond, wetland, stream or drainage ditch? ☐ Yes ☒ No
If yes, identify water resource affected. Describe alternatives considered and proposed mitigation measures to minimize impacts. Give the DNR Protected Waters Inventory (PWI) number(s) if the water resources affected are on the PWI.

13. Water Use. Would the Site involve installation or abandonment of any water wells, connection to or changes in any public water supply or appropriation of any ground or surface water (including dewatering)? ☐ Yes ☒ No
If yes, as applicable, give location and purpose of any new wells; public supply affected, changes to be made, and water quantities to be used; the source, duration, quantity and purpose of any appropriations; and unique well numbers and DNR appropriation permit numbers, if known. Identify any existing and new wells on the site map. If there are no wells known on site, explain methodology used to determine.

The City provides water and sewer service to the SWTF. The entire area surrounding the site is served by the City water and sewer system. No additional wells are planned for this SWTF.

14. Water-related land use management districts. Does any part of the Site involve a shoreland zoning district, a delineated 100-year flood plain, or a state or federally designated wild or scenic river land use district? ☐ Yes ☒ No
If yes, identify the district and discuss Site compatibility with district land use restrictions.

15. Water Surface Use. Would the Site change the number or type of watercraft on any water body?
☐ Yes ☒ No
If yes, indicate the current and Siteed watercraft usage and discuss any potential overcrowding or conflicts with other uses.

16. Erosion and Sedimentation. Give the acreage to be graded or excavated and the cubic yards of soil to be moved: 1 acres; 1,000 cubic yards. Describe any steep slopes or highly erodible soils and identify them on the site map. Describe any erosion and sedimentation control measures to be used during and after Site construction.

The Site would generally drain from west to east, with steeper slopes on both the north border and south border of the property. All land around the Site exists at a higher elevation. There are no highly erodible soils present at the Site.

The Site is currently graded and relatively flat with low erosion potential, but would undergo some superficial grading in portions prior to beginning operations as a SWTF. Silt fence and hay bails (as appropriate) would be installed at the boarders to provide temporary erosion and sediment control during re-grading activities. Soils tracked from the re-grading areas by motor vehicles and equipment would be cleaned from paved areas throughout the duration of re-grading activities. Best management practices would be employed when implementing temporary erosion control measures, and would be maintained to reduce the potential for erosion and sedimentation until re-grading is complete and vegetation (where appropriate) has been established.

No soils would need to be excavated for the proposed Site.

17. Water Quality - Surface Water Runoff.

a. Compare the quantity and quality of site runoff before and after the Site. Describe permanent controls to manage or treat runoff. Describe any storm water pollution prevention plans.

The SWTF would not increase the quantity of storm water run-off from the Site. Structural improvements would yield a small increase in impervious surface and could potentially add minor amounts of any potential pollutants, such as pollutants typical of truck roadway and parking lot run-off. However, the conversion from the recycling center to the SWTF would result in a relatively smaller amount of activity occurring outdoors, compared with the existing recycling center, potentially decreasing the total loading of pollutants to the City municipal storm water system.

The driving surfaces would be paved bituminous and packed gravel, which would help control the tracking of dirt onto L'orient Street and Pennsylvania Avenue, and thereby minimizing the potential for significant materials to be engaged with storm water run-off. Some property re-grading would also promote proper storm water flow and direction (slope downward to the east) toward the storm water collection point.

Construction activities would not disturb more than five acres of total land area. A storm water permit for construction activity is not required. The SWTF would, however, operate under a general storm water permit for industrial activity. A storm water pollution prevention plan would be prepared for facility operations, incorporating current structural and non-structural best management practices (such as training, inspections, etc.), thereby minimizing potential water quality and water quantity impacts. Overall, storm water management would likely be improved at the Site as a result of this SWTF due to structural improvements to the facility completed during conversion from recycling center operations to transfer operations.

b. Identify routes and receiving water bodies for runoff from the site; include major downstream water bodies as well as the immediate receiving waters. Estimate impact runoff on the quality of receiving waters.

Precipitation reaching the Site would be controlled and managed in accordance with the NPDES General Storm Water Permit. The driving surfaces on-site would be paved bituminous and packed gravel, and the site would be graded for storm water to drain to the east. All storm water from the Site would flow into the City's municipal storm sewer system and ultimately to the Mississippi River. No adverse impacts from the Site runoff are anticipated as a result of the SWTF. Because the SWTF site includes increased landscaping and decreased impervious surfaces any potential impacts of storm water runoff are expected to be reduced.

As required by the general storm water permit, regular inspections would be conducted to prevent storm water runoff and/or runoff problems. If problems occur, they would be corrected and action would be taken to prevent future occurrences.

18. Water Quality – Wastewater.

a. Describe sources, composition and quantities of all sanitary, municipal and industrial wastewater produced or treated at the site.

The SWTF would employ 4-10 full-time employees, thereby generating domestic use wastewater. The only industrial wastewater anticipated from the SWTF operations is wastewater from the Site's operational wastewater collection system (described below). All sewage generated at the SWTF would be sewered to the City municipal sanitary sewer district, and subsequently routed to the

Metropolitan Council Environmental Services (MCES) Pigs Eye/Metropolitan Wastewater Treatment Plant.

An operational wastewater collection system would be constructed at the Site to serve the SWTF so that wastewater generated during solid waste handling activities would not interact with storm water. Solid waste handling activities involving wastewater generation include equipment washing, janitorial work area cleaning, and operational wastewater. The operational wastewater collection system would be designed to collect and convey any liquid generated in the transfer trailer loadout area to a collection point (drain or grate) and then to a sealed 1,000-gallon underground holding tank. It is estimated that less than 2,000 gallons of wastewater per year would be generated from the operational wastewater collection system.

The tank would be equipped with the appropriate leak detection equipment, as well as, an automated level and alarm system (indicator light) to inform the facility operator when the tank is two-thirds full. Once the operational wastewater is collected, it would be analyzed prior to disposal. The operational wastewater would be disposed of in accordance with applicable regulations. The disposal method would depend upon the quality of the wastewater.

b. Describe waste treatment methods or pollution prevention efforts and give estimates of composition after treatment. Identify receiving waters, including major downstream water bodies, and estimate the discharge impact on the quality of receiving waters. If the Site involves on-site sewage systems, discuss the suitability of site conditions for such systems.

All non-operational wastewaters from the SWTF would discharge to the City municipal sanitary sewer system, which flows to the MCES Pigs Eye/Metropolitan Wastewater Treatment Plant. The MCES Pigs Eye/Metropolitan Wastewater Treatment Plant discharges treated water into the Mississippi River.

Pollution Prevention

Maintenance procedures would include regularly scheduled inspection and maintenance of equipment according to manufacturer's specifications. Roads would be swept and potholes or other damage repaired as necessary. The SWTF would be thoroughly cleaned on an as-needed basis, and all residuals would be disposed of properly. The tipping floor would be cleaned at least monthly. The tipping floor is a reinforced concrete pad and when swept would be inspected by the facility operator for any cracks or damage. If the facility operator notices any problems, repairs would be implemented immediately. The extent of the repairs may vary. For small cracks the facility may grout or mortar the cracks themselves. It is likely that an outside contractor (who could be on-site within 24 to 48 hours) would be hired to repair more significant damage to eliminate the potential for any impact on the environment.

Operator Training

Personnel training would be recorded in the facility operating record, and dates and types of training would be included in the annual report. Operator training would be conducted by the Owner, since at present there is no MPCA training program for transfer station operations.

New employees would be given on-the-job training, and would be trained within six months of employment. Training updates would be conducted routinely, addressing all procedures and requirements. If an MPCA operator certification program is created for transfer station operators, a new training schedule utilizing the MPCA program would be developed and implemented. Operator training would address the environmental aspects and impacts of each employee's job description and responsibilities.

Inspections
The facility manager would conduct regular inspections, and necessary actions would be taken to maintain a clean, safe, and secure facility. In addition, informal daily inspections would also be conducted as a "trouble-shooting" measure.

c. If wastes would be discharged into a publicly owned treatment facility, identify the facility, describe any pretreatment provisions and discuss the facility's ability to handle the volume and composition of wastes, identifying any improvements necessary.

No pretreatment provisions are planned as part of the SWTF. The existing City municipal sanitary sewer system has adequate capacity to accommodate wastewater discharges from the SWTF. No improvements are anticipated to be necessary.

d. If the Site requires disposal of liquid animal manure, describe disposal technique and location and discuss capacity to handle the volume and composition of manure. Identify any improvements necessary. Describe any required setbacks for land disposal systems.

The Site as proposed does not require disposal of liquid animal manure.

19. Geologic hazards and soil conditions.

a. Approximate depth (in feet) to Ground water: 41 - 50 minimum; 45.5 average.
Bedrock: 100 - 200 minimum; 150 average.
Describe any of the following geologic site hazards to ground water and also identify them on the site map: sinkholes, shallow limestone formations or karst conditions. Describe measures to avoid or minimize environmental problems due to any of these hazards.

There are no known geologic site hazards to ground water pertaining to sinkholes, shallow limestone formation of karst conditions.

b. Describe the soils on the site, giving SCS classifications, if known. Discuss soil granularity and potential for groundwater contamination from wastes or chemicals spread or spilled onto the soils. Discuss any mitigation measures to prevent such contamination.

The United States Soil Conservation Service (SCS) *Soil Survey of Washington and Ramsey Counties Minnesota* (1980) identifies soils at the Site as wet substratum of mixed, frigid Udorthents. This soil mapping unit is used by SCS to describe a heterogeneous mix of earthy fill material that has been placed on poorly drained and very poorly drained mineral and/or organic soils. The fill material may be comprised of sandy, gravelly, loamy, and/or silty soil. Up to 20 percent of this fill material may also be comprised of bricks, trash, wire, metal, boards, industrial wastes, concrete and/or stones. No specific hazards associated with the SWTF have been identified which could potentially impact groundwater.

20. Solid Wastes, Hazardous Wastes, Storage Tanks.

a. Describe types, amounts and compositions of solid or hazardous wastes, including solid animal manure, sludge and ash, produced during construction and operation. Identify method and location of disposal. For Sites generating municipal solid waste, indicate if there is a source separation plan; describe how the Site would be modified for recycling. If hazardous waste is generated, indicate if there is a hazardous waste minimization plan and routine hazardous waste reduction assessments.

The SWTF would not generate or receive solid animal manure, sludge or ash, either during construction or operation. Hazardous waste would not be received at the SWTF. The proposed SWTF would receive, consolidate, and transfer solid waste received from other parties generating solid waste.

All waste storage would be temporary. Typically, wastes would remain on-site for less than 24 hours, except during extreme weather conditions or other contingency situations. Temporary storage volumes would be kept to a level that would not impede facility operations. Stored Mixed MSW, industrial waste, and demolition/construction debris, would be kept within the transfer building or containers. There would be no outdoor storage or processing of materials. Inside the building, waste processing equipment would be installed to facilitate efficient and effective waste handling operations. The tipping floor surface is more than adequate to handle the proposed amount of waste capacity. The various waste types received at the Site would be placed in the separately assigned roll-off boxes or trailers.

Solid Waste Handling

The following types of materials would be received at the Site for consolidation and transfer to a solid waste facility:

- MSW;
- C&D;
- Industrial waste, including but not limited to paper and cardboard waste from the manufacturing processes or packaging; food and beverage packaging and handling materials; food not containing free liquids; aluminum, iron, steel, glass, wood, and hardened, cured plastic waste; and
- Recyclables.

Mixed Municipal Solid Waste

The majority of the solid waste arriving at the Site would be MSW. The SWTF would have an approximately 6,000 square foot MSW tipping area, resulting in a maximum on-site receiving capacity of 1,800 cubic yards with an average height of 8 feet. All MSW and non-hazardous industrial waste would be directed to the concrete tipping area for unloading. The extraction of recyclables would be accomplished manually at the tipping area; typically, few recyclables would be extracted from the MSW, as this waste comes from residential areas already practicing source separation. The MSW and industrial wastes would be placed in transfer trailers and compacted by a front-end loader. Wastes would be transferred off-site on a daily basis. Special handling and storage requirements applicable to non-hazardous industrial wastes would be specified in the Industrial Solid Waste Management Plan for the SWTF.

Construction and Demolition Debris

C&D would be directed to the C&D tipping area and processed separately from the MSW. The C&D tipping area would be approximately 2,000 square feet in size, which results in 600 cubic yards of C&D storage capacity with an average height of 8 feet. Prior to loading, the C&D

(concrete, wood, etc.) would be broken and crushed on the tipping floor using a trackhoe excavator with grapple. The C&D would then be loaded into transfer trailers using a front-end loader. C&D would ultimately be transferred to a C&D landfill.

Recyclables

Recycling at the Site would be accomplished by separating materials such as scrap metal from MSW loads on the tipping floor and by the receipt and collection of recyclables in on-site containers. Private individuals and commercial customers would be directed to the appropriate unloading area (roll-off containers and bunkers) depending on the type of recyclables received. All salvageable and recyclable materials would be placed in indoor floor areas, and roll-off boxes or trailers situated within the building. There would be separate areas for each type of material.

Additional and longer-term storage is proposed for recyclables. Recyclables would be accepted and stored on-site until a full load is obtained, at which time they would be transported to an appropriate processing or disposal facility. On-site storage of recyclables would not exceed the capacity of on-site containers or bunker areas. In addition, yard waste/brush are stored in a stockpile within a bunker area until there is sufficient capacity for a transfer trailer load. No more than 150 tires would be stored on-site at a given time, unless a separate permit is obtained for this activity in accordance with the Minnesota Statutes.

Special provisions would be made when bulky items come in for temporary storage so that storage does not impede daily operations. Bulky items would be removed as needed. Electronics would also be placed in containers and removed from the facility as needed.

Ultimate Disposition of Transferred Wastes

Wastes leaving the Site may be transferred to any of the following potential waste disposal facilities:

- NRG Resource Recovery Facility, Newport, Minnesota;
- Pine Bend Landfill, SW-045, Inver Grove Heights, Minnesota (Sanitary Landfill);
- Elk River Sanitary Landfill, SW-074, Elk River, Minnesota (Sanitary Landfill);
- Spruce Ridge Landfill, Inc., SW-006, Glencoe, Minnesota (Sanitary Landfill);
- Burnsville Sanitary Landfill, SW-056, Burnsville, Minnesota (Sanitary Landfill)
- Central Disposal Landfill, Lake Mills, Iowa

Other disposal sites may be used, as appropriate. Only solid waste management facilities licensed by the appropriate regulatory agencies would be utilized.

Unacceptable Waste Types

Those wastes specifically precluded from receipt at the proposed SWTF are:

1) Waste containing polychlorinated biphenyls at a concentration greater than 50 part per million;
2) Rendering and slaughterhouse wastes;
3) Wastes that could spontaneously combust or that could ignite other waste because of high temperatures;
4) Ash from incinerators, resource recovery facilities, and power plants;
5) Sludges, including ink sludges, lime sludge, wood sludge, and paper sludge;
6) Spent-activated carbon filters;
7) Hazardous wastes, categorized according to Minnesota Statutes, Chapter 115B and 116, and Minn. R. ch. 7045, or wastes that have not been evaluated pursuant to Minn. R. 7045.0214 to 7045.217;
8) Sewage sludge, septic tank pumpings, sewage sludge compost, or sewage, unless it has been treated by a process to significantly reduce pathogens pursuant to Minn. R. 7040.0100 to 7040.4700 or 7035.2835;
9) Infectious wastes;

10) Radioactive wastes;
11) Wastes containing free liquids; and
12) Free liquids.

As noted, hazardous wastes would not be accepted at the SWTF. Only non-hazardous industrial wastes that are pre-approved by the end disposal facility would be accepted. Incoming loads of non-hazardous industrial waste would be inspected by facility personnel to verify that the volume and type of material delivered is properly recorded. Any unacceptable wastes delivered to the tipping floor would be pulled out by the operator, isolated, and removed from the transfer station for proper disposal.

The facility operator would not accept MSW from vehicles that do not meet the requirements of Minn. R. 7035.0800, subps. 2 and 3 (excluding vehicles of the general public), and all vehicles transporting waste for the SWTF would comply with rule requirements.

Hazardous Waste Generation

A very small quantity of hazardous waste is expected to be generated during SWTF operations from on-site activities such as equipment maintenance and general facility upkeep. As a very small quantity hazardous waste generator, Waste Management would not be required to prepare or maintain a hazardous waste minimization plan or conduct routine hazardous waste reduction assessments.

Copies of the SWTF approved Contingency Plan, Emergency Response Plan, Operation and Maintenance Plan, Industrial Solid Waste Management Plan, and Closure Plan would be available at the facility for use by the operator and facility personnel. Employees would be trained on the application and implementation of these plans. These plans have all been submitted as part of the SWTF operating permit application.

Any wastes generated during the operation of the SWTF would be removed and disposed of off-site in accordance with state and local requirements, and industry-accepted methods.

b. Identify any toxic or hazardous materials to be used or present at the site and identify measures to be used to prevent them from contaminating groundwater. If the use of toxic or hazardous materials would lead to a regulated waste, discharge or emission, discuss any alternatives considered to minimize or eliminate the waste, discharge or emission.

The proposed re-grading and remodeling (construction) activities are not anticipated to impact ground water at the Site. No hazardous waste generation is expected during re-grading or building improvement activities.

Except for the storage of diesel fuel, as described in Item 18.c. below, no bulk quantities of toxic or hazardous materials are anticipated to be stored and/or used at the Site.

Non-bulk quantities of toxic or hazardous materials that are anticipated to be present at the Site consist of petroleum oils, lubricants and greases used for equipment maintenance, as well as aqueous cleaners and touch up paints used for general facility upkeep. Most of these materials would be completely consumed in their intended uses. A list of hazardous substances, toxic substances and hazardous materials maintained at the existing Waste Management Solid Waste Transfer Facility at 800 Westminster Street represents the chemicals expected to be maintained at the SWTF. None of the chemicals listed for the 800 Westminster Solid Waste Transfer Station are present in quantities exceeding 55 gallons.

Wastes generated from the use of any toxic or hazardous materials at the SWTF would be evaluated in accordance with MPCA hazardous and solid waste requirements and managed in accordance with the results of those evaluations and appropriate MPCA and Ramsey County waste management regulations. Given the types, uses, and quantities of chemicals expected to be used at the SWTF, the likelihood that these chemicals could enter the groundwater is very low.

For any toxic or hazardous materials used at the Site, best management practices would be employed regarding storage, handling, use and disposal to prevent their interaction with storm water and prevent the potential for an environmental release.

c. Indicate the number, location, size and use of any above or below ground tanks to store petroleum products or other materials, except water. Describe any emergency response containment plans.

No below ground tanks would be installed at the Site except for the operational wastewater collection system below ground tank (containing water) described in Item 18.a. above.

One 1,000-gallon aboveground storage tank (AST) would be present at the Site. The AST would contain diesel fuel for use in refueling SWTF waste handling vehicles and other equipment. The AST would be designed, constructed and used in accordance with applicable state AST requirements. SWTF plans would address emergency preparedness and response to any potential releases from this AST.

21. Traffic. Parking spaces added: None Existing spaces (if Site involves expansion): NA
Estimated total average daily traffic generated: 125 – 150 vehicles per day Estimated maximum peak hour traffic generated (if known) and its timing: 66 vehicles per hour, 1:00 p.m. to 2:00 p.m.
Provide an estimate of the impact on traffic congestion affected roads and describe any traffic improvements necessary. If the Site is within the Twin Cities metropolitan area, discuss its impact on the regional transportation system.

The Site is situated approximately ½-mile north of I-94 and immediately west of I-35E. It has excellent access to all parts of the East Metro area. It is also located one block north of Pennsylvania Avenue, a major east/west arterial that connects to Pierce Butler Road on the west and eventually to Phalen Corridor on the east.

Refuse trucks would enter L'orient Street from Pennsylvania Avenue, drive through the gate at the southeast corner of the Site, and to the platform scale on the south side of the Site. The location of the platform scale in relation to the Site entrance allows for the queuing of vehicles on the property should there be any temporary delay at the platform scale. This would be the only vehicle entrance/exit to the Site. All waste vehicles would be inspected and weighed. Once over the scale, they would move to the west end of the Site and, executing a three-point turn, back into the doorways of the waste transfer building. The vehicles would then be inspected and directed to the appropriate tipping area, depending on the waste type. Inside the building, the materials in the refuse trucks would be unloaded. Front-end loaders would be used to transfer refuse into semi-tractor trailers. Refuse trucks would then exit the building and pass over the platform scale again. Once the empty truck is weighed, it would exit the Site by way of L'orient Street.

Semi-tractor trailers would also enter and exit the Site from L'orient Street. Semi-tractor trailers would enter and exit the building at the west end and, occasionally at the east end. All waste transfer operations would be inside the building. To haul away MSW, transfer vehicles would leave the Site at an average rate of 20 to 25 per day.

Vehicle Trips

It is expected that the number of vehicles accessing and leaving the SWTF would be approximately 125-150 each day. The SWTF has the capacity to receive/handle approximately 175 to 225 vehicles per day. No more than 225 vehicles are expected to be received/handled on any given day. The number of vehicles accessing and leaving the old recycling facility was approximately 128 each day.

Based on actual counts at the existing solid waste transfer facility at 800 Westminster, the peak vehicle trip period at the SWTF would be from 1:00 p.m. to 2:00 p.m. Because of the overall similarities in vehicle trip generation, as well as on-site vehicle staging capacity, it is not expected that the relocated SWTF would increase traffic congestion in the area.

Operating Hours

Daily and weekly traffic volumes are also a function of facility operating hours. The existing recycling center operates from 4:00 am through 2:00 am, Mondays through Saturdays. Total weekly hours of operation for the existing recycling center are currently 132 hours.

The SWTF would operate 6:00 am through 5:00 p.m. Mondays through Fridays, 7:00 am through noon on Saturdays and not operate on Sundays. This schedule of operation roughly approximates typical workweek hours. Total weekly hours of operation would be 60 hours. The total hours of operation for the SWTF would therefore be 72 hours less per week than those of the existing recycling center.

Because the proposed SWTF replaces existing capacity for solid waste transfer stations, the potential impact on the regional transportation system for the seven-county Twin Cities metropolitan area is considered to be neutral. The SWTF is not expected to cause traffic congestion, therefore, no traffic improvements are proposed.

22. Vehicle-related Air Emissions. Estimate the effect of the Site's traffic generation on air quality, including carbon monoxide levels. Discuss the effect of traffic improvements or other mitigation measures on air quality impacts. Note: If the Site involves 500 or more parking spaces, consult *EAW Guidelines* about whether a detailed air quality analysis is needed.

The SWTF would generate air emissions as a result of vehicles driving to and from the Site. Motor vehicles emit a variety of air pollutants including carbon monoxide, hydrocarbons, nitrogen oxides, and particulates. The air emissions generated from these vehicles would not increase air emissions to existing levels in the metropolitan area, however, because the vehicles are currently routed to two other transfer stations that would be closed if this SWTF proceeds.

The SWTF does not involve 500 or more parking spaces. Traffic congestion is not anticipated as a result of its operation. Due to the similarities between the operations of the existing recycling center and the proposed SWTF, vehicle-related air emissions are not anticipated to be significantly different from current recycling center vehicle-related air emissions.

23. Stationary Source Air Emissions. Describe the type, sources, quantities and compositions of any emissions from stationary sources of air emissions such as boilers, exhaust stacks or fugitive dust sources. Include any hazardous air pollutants (consult *EAW Guidelines* for a listing), any greenhouse gases (such as carbon dioxide, methane, and nitrous oxides), and ozone-depleting chemicals (chlorofluorocarbons, hydrofluorocarbons, perfluorocarbons or sulfur hexafluoride). Also describe any proposed pollution prevention techniques and proposed air pollution control devices. Describe the impacts on air quality.

There are no stationary source air emissions associated with the SWTF that would require an MPCA indirect source air permit. Waste would not be processed at the Site. No hazardous air pollutants or ozone depleting chemicals would be emitted from stationary sources at the Site. Vehicles that are entering and leaving the site (described in Item 22 above) would generate air emissions from the SWTF. Some air emissions would also be generated from facility equipment such as front-end loaders, semi tractors and a trackhoe excavator with grapple. Air emissions generated by facility equipment would be similar in nature to air emissions generated by vehicle traffic. Dust emissions are addressed in Item 24 below.

24. Odors, noise and dust. Would the Site generate odors, noise or dust during construction or during operation? ☒ Yes ☐ No
If yes, describe sources, characteristics, duration, quantities or intensity and any proposed measures to mitigate adverse impacts. Also identify locations of nearby sensitive receptors and estimate impacts on them. Discuss potential impacts on human health or quality of life. (Note: fugitive dust generated by operations may be discussed at item 23 instead of here.)

Dust

Relatively limited dust emissions would likely be generated both during construction of the Site and its operation. Dust emissions are more likely to be generated during construction activities than during SWTF operation.

The only meaningful exterior construction activity likely to generate dust emissions is the re-grading of 15,000 square feet on the west side of the Site (currently packed gravel cover) and planting an approximately 20,000 square feet area on the western side of the Site with prairie grasses, shrubs and trees. Dust emissions occurring in connection with the regrading construction activities are not expected to be significant. If necessary, areas would be watered to help control dust emissions during regrading. Following construction, the entire Site would be landscaped or covered by pavement or building.

During operation of the SWTF, the principal source of dust generation would be vehicles bringing materials and leaving the Site. The majority of vehicles bringing materials to the Site would be covered, limiting dust emissions. Though dust can and frequently does result from the loading, movement and compaction of waste, these dust generating activities would all be conducted inside the building.

Noise

The operation of the SWTF would result in the generation of noise emissions. Primary sources of noise associated with the operation of the SWTF would be vehicle traffic, engine operation, and truck beeper alarms, among other sources.

Noise generated at the Site from beeper alarms is expected to be similar in nature to the beeper alarms noise currently generated at the recycling center. However, beeper alarms noise impacts to neighbors is expected to be less for the Site than under existing conditions, because the recycling center currently has outdoor tipping and longer hours of operation than the SWTF. Operational noise from the SWTF would occur generally during daylight hours. The SWTF would be closed during the period from 10:00 p.m. to 5:00 a.m., and would comply with MPCA nighttime noise standards. Trucks dropping their loads as well

as other operations would be conducted inside the building, the impact of all other truck related noise emissions would be mitigated.

Noise studies indicate that traffic on I-35E is the overwhelming primary source of noise for all properties within the area. Noise levels recorded at the existing solid waste transfer station east of I-35E (800 Westminster) indicate that daytime noise levels adjacent to the existing waste transfer facility are below state noise standards, and generally lower than noise levels associated with I-35E traffic. Since traffic and operations for the SWTF would be similar to those for the existing waste transfer station, it is unlikely that the SWTF would generate adverse noise impacts.

Based on noise data gathered in the area during a recent study, it is predicted that the operations at the SWTF would not result in off-site daytime noise levels higher than those generated by the existing recycling facility. The net volume of noise generation in the area would be reduced with the construction of the SWTF because its operations would be enclosed.

Odors

MSW can generate odorous emissions when it begins to decompose. Odor increases in direct proportion to the stage of decomposition. The key to odor minimization is the avoidance of decomposition. Cold weather retards decomposition. Prompt/efficient processing of MSW also reduces decomposition and odor generation. Waste would be processed as efficiently as possible at the SWTF so as to avoid or limit odorous emissions. It is expected that the vast majority of waste at the SWTF would be sorted and transferred within 24 hours or less following receipt. Some MSW would be kept longer (in the case of Saturday receipts), but in no event would solid waste stay on site for more than 48 hours.

The existing solid waste transfer station on Westminster has never received a formal odor complaint from either a neighbor or any government agency. In contrast of the SWTF, all solid waste handling activities at the existing SWTF are conducted outside.

Nuisance Control: Litter and Vectors

The operation of the SWTF would be governed and controlled by City, County and State permits, licenses, and regulations. Both operational practices and regulatory requirements establish controls to eliminate and mitigate nuisances. Waste would be enclosed and containerized as much as possible on the site. All putrescible waste remaining at the SWTF at the end of the operating day would be stored inside the building or within a transfer trailer located on site.

The tipping floor would be scrapped and swept to minimize potential release of dust. Vectors (rodents, etc.) would not be attracted to the Site due to aggressive maintenance and treatment/disposal practices. A pest control contractor would inspect the SWTF on a regular basis.

The perimeter of the SWTF is surrounded by chain link fencing which minimizes/eliminates the movement of windblown litter off the Site. In addition, litter pickup is conducted at the Site on a daily basis. The Site is regularly swept and maintained to avoid unhealthy and/or unsightly conditions. Waste Management's existing solid waste transfer facility has not experienced litter problems during its operation.

25. Nearby resources. Are any of the following resources on or in proximity to the site?

a. Archaeological, historical, or architectural resources? ☐ Yes ☒ No
b. Prime or unique farmlands or land within an agricultural preserve? ☐ Yes ☒ No
c. Designated parks, recreation areas, or trails? ☒ Yes ☐ No
d. Scenic views and vistas? ☐ Yes ☒ No
e. Other unique resources? ☐ Yes ☒ No

If yes, describe the resource and identify any Site-related impacts on the resources. Describe any measures to minimize or avoid adverse impacts.

The Gateway State Trail begins in St. Paul approximately ¼ mile north of the proposed SWTF near Cayuga Street. The Gateway State Trail is an 18.3-mile multiple use trail starting in St. Paul and ending in Pine Point Park in Washington County. The operation of the proposed SWTF is not expected to have any impact on the use or enjoyment of the Gateway State Trail.

26. Visual impacts. Would the Site create adverse visual impacts during construction or operation? Such as glare from intense lights, lights visible in wilderness areas and large visible plumes from cooling towers or exhaust stacks? ☐ Yes ☒ No
If yes, explain.

The construction of the proposed SWTF would result in two visual improvements at the Site. Significant landscaping treatment would be established in the prairie grasses area as well as other locations on the Site. The objective of the landscaping plan is to provide a buffer between the SWTF and adjacent properties. With the landscaping treatment, adjacent properties would be shielded from activities on the Site. To provide a buffer between the site and the properties to the north, the applicant proposes to construct fences along the top of the hill, near the edge of the rear yards of the properties on Acker Street.

27. Compatibility with plans and land use regulations. Is the Site subject to an adopted local comprehensive plan, land use plan or regulation, or other applicable land use, water, or resource management plan of a local, regional, state or federal agency? ☒ Yes ☐ No
If yes, describe the plan, discuss its compatibility with the Site and explain how any conflicts would be resolved. If no, explain.

The SWTF is consistent with the City's Comprehensive Land Use Plan and its Zoning Ordinance. It is in an area that is planned and zoned for industrial use. The SWTF is located primarily in an I-2 District with some land in an I-1 District. An application to rezone the I-1 portion of the Site to I-2 has been submitted. The zoning treatment of immediately adjacent properties is also industrial. The existing uses (and zoning classifications) of adjacent parcels is as follows:

- North – Railroad tracks abutted to the north by residential and small businesses, including auto repair (utility; I-1 and RT-2);
- West – industrial (I-1 and I-2) – (the I-2 portion is the MnDOT Railroad Museum;
- South – auto salvage business and two residences, one of which is used for business (I-1 and I-2); and
- East – Interstate Highway: I-35E right-of-way (I-1).

The site is situated on the south side of the railroad mainline between Minneapolis and St. Paul. It is proximate to the Williams Hill Redevelopment Site on the east and the Empire Builder Industrial Park on the west.

Other developments located in the vicinity of the SWTF include: the State Capitol, Capitol Area Building Complex (3,500 feet southwest), the Oakland Cemetery (1,200 feet northwest), McDonough Homes (approximately 2,000 feet south), and the Cayuga residential area located to the north.

The proposed use of the Site as a SWTF would be very similar to the current use, as a recycling center. Both facilities involve the receipt and transfer of waste from truck to off-site transportation vehicles. They generate similar types of noise, traffic, air emissions, and other off-site impacts. Transfer station/operational activities would be similar to the present use with no new enclosed structures to be constructed. Trucks would move to and through the transfer station, much as they do now. Waste moving and sorting equipment operations would be conducted inside the existing building as at present, and the movement of trucks onto and off the Site would occur at essentially the same locations and in the same pattern as with the recycling operation. A principle difference between the two operations would be the receipt, off loading, and movement of MSW. MSW is not currently received at the recycling facility.

28. Impact on infrastructure and public services. Would new or expanded utilities, roads, other infrastructure or public services be required to serve the Site? ☐ Yes ☒ No
If yes, describe the new or additional infrastructure or services needed. (Note: any infrastructure that is a connected action with respect to the Site must be assessed in the EAW; see *EAW Guidelines* for details.)

29. Cumulative impacts. Minn. R. 4410.1700, subp. 7, item B requires that the RGU consider the "cumulative potential effects of related or anticipated future Sites" when determining the need for an environmental impact statement. Identify any past, present or reasonably foreseeable future Sites that may interact with the Site described in this EAW in such a way as to cause cumulative impacts. Describe the nature of the cumulative impacts and summarize any other available information relevant to determining whether there is potential for significant environmental effects due to cumulative impacts (or discuss each cumulative impact under appropriate item(s) elsewhere on this form).

No further development of the Site is planned at this time. There are no future or related sites proposed in the vicinity of the SWTF. There are no other known sites that would interact with the SWTF to cause cumulative environmental impacts.

30. Other Potential Environmental Impacts. If the Site may cause any adverse environmental impacts not addressed by items 1 to 28, identify and discuss them here, along with any proposed mitigation.

There are no other potential environmental impacts known or predicted for this Site.

31. Summary of issues. List any impacts and issues identified above that may require further investigation before the Site is begun. Discuss any alternatives or mitigative measures that have been or may be considered for these impacts and issues, including those that have been or may be ordered as permit conditions.

The existing land use is compatible with the proposed rezoning. The Site has been used as a recycling facility, a relatively intense industrial use for approximately seven years. The use of the Site for a SWTF would be similar to the existing use.

The SWTF would operate 55 percent fewer hours each week. The reduction in hours of operation should contribute to some mitigation of off-site impacts attributable to noise, lighting, and dust, due to the more limited operating hours and truck reception periods. Though more vehicles would come to the transfer station each day than currently access the recycling facility. Peak period vehicle trips generated by the

transfer station would be similar to the number generated currently by the recycling facility. Virtually all of the operations activities would be conducted indoors, which should contribute to mitigation of odor, noise, and dust impacts. Storm water management, visual aesthetics and landscaping should all be improved at the Site as a result of the SWTF.

RGU CERTIFICATION.

I hereby certify that:

- The information contained in this document is accurate and complete to the best of my knowledge.
- The Waste Management EAW describes the complete Site; there are no other sites, stages or components other than those described in this document, which are related to the Site as connected actions or phased actions, as defined at Minn. R. 4410.0200, subps. 9b and 60, respectively.
- Copies of this EAW are being sent to the entire EQB distribution list.

Name and Title of Signer: _____

Beth G. Lockwood, Supervisor, Environmental Review Unit
Operations and Environmental Review Section
Regional Environmental Management Division

Date: _____

The format of the Environmental Assessment Worksheet was prepared by the staff of the Environmental Quality Board at Minnesota Planning. For additional information, worksheets or for *EAW Guidelines*, contact: Environmental Quality Board, 658 Cedar St., St. Paul, MN 55155, 651-296-8253, or at their Web site http://www.mnplan.state.mn.us.