

General information

Public comment period begins: June 29, 2021

Public comment period ends: July 29, 2021 (4:30 p.m.)

Current permit issued: February 3, 2020

Current permit expiration date: February 3, 2025

Name and address of Permittee:

Pope/Douglas Solid Waste
Management (Joint Powers Board)
2115 Jefferson St
Alexandria, MN 56308-2701

Facility name and location:

Pope/Douglas Solid Waste
Management
2115 Jefferson St
Alexandria, MN 56308-2701
Douglas County
T127N, R40W, Section 006

MPCA contact person:

Joshua Markham
Industrial Division
Minnesota Pollution Control Agency
520 Lafayette Rd.
St. Paul, MN 55155-4102
Phone: 651-757-2021
Email: Joshua.markham@state.mn.us

File manager phone: 651-757-2728 or
1-844-828-0942

A draft permit and supporting documentation are available for review on the MPCA Public Notices webpage at <http://www.pca.state.mn.us/publicnotices>. Additional materials relating to the issuance of this permit are available for inspection. Please call the listed MPCA contact person between the hours of 8:00 a.m. and 4:30 p.m., Monday through Friday to arrange for this. The MPCA will mail or email a copy of the draft permit upon request. Comments, petitions, and other requests must be received at the MPCA in writing on or before the public comment period end date and time identified above.

Watershed: NA

Receiving water: NA

Description of Pope/Douglas Solid Waste Management and permit activity

The Pope/Douglas Solid Waste Management (Facility) is located at 2115 S Jefferson St in Alexandria, Douglas County, Minnesota. Pope/Douglas Solid Waste Management is a waste-to-energy facility operating three waste combustion units (EQUI32, EQUI33, and EQUI37), and a 3.5 MMBtu/hr natural gas fired auxiliary boiler (EQUI36). EQUI32 and EQUI33 have a combined capacity of 120 tons of municipal solid waste (MSW) per day. EQUI37 is capable of burning 120 tons of MSW per day. The Facility generates steam which is sold locally. The Facility also operates a small steam turbine for generating electricity.

Pollution control equipment consists of dry lime injection for the control of acid gases, activated carbon injection for the control of dioxin (and possibly mercury) and a fabric filter for the control of particulate matter (PM), particulate matter less than 10 microns (PM10), particulate matter less than 2.5 microns (PM2.5) and metals. A portion of the flue gases are recirculated from the fabric filter outlet to the combustion chamber (i.e., flue gas recirculation). Exhaust gases from EQUI32 and EQUI33 enter the atmosphere through the same stack. Exhaust gases from EQUI 37 enter the atmosphere through a separate stack. Exhaust gases are continuously monitored for Carbon Monoxide (CO), Sulfur Dioxide (SO₂), opacity, and Oxygen (O₂). A number of operating parameters, including fabric filter inlet temperature, steam flow rate, and activated carbon feed rate parameters are also monitored continuously.

The Facility also has several operations that qualify as insignificant activities including a Materials Recovery Facility where waste is processed to identify and remove certain materials from the waste stream prior to combustion, such as recyclables and non-combustible materials; lime storage silos, and a household hazardous waste collection center.

This permit action is a Permit Reopening. Construction is not being authorized. Due to stack testing during March 23, 2021 - March 24, 2021 and subsequent Notice of Compliance (NOC) found in Attachment 3 of the TSD, this Permit Reopening adjusts operating parameter limits for incinerator Unit 3 (EQUI 37) and related pollution controls for carbon injection (TREA 7), sorbent injection (TREA 8), and bag filter (TREA 9). The steam flow from Incinerator Unit 3 (EQUI 37) is now required to flow at less than or equal to 43,058 lb/hr. This is a reduction of 2,400 lb/hr from the previous requirement. The carbon injection (TREA 7) is now required to operate at greater than or equal to 4.5 lb/hr in order to control dioxins, furans, and mercury. This is a reduction of 1.0 lb/hr from the

previous requirement. The acid gas control on Incinerator Unit 3 (TREA 8) must maintain an average feed rate greater than or equal to 280 lb/hr of lime and recirculate fly ash at 80 lb/hr. This lime feed rate is a reduction of 20 lb/hr from the previous requirement. The inlet flow to the bag house (TREA 9) must maintain a temperature of less than or equal to 416 °F to further ensure filter performance.

Prior to this reopening, the MPCA received two Administrative Amendment applications from the facility to request 31 day extensions to an October 2020 sample ash collection and an April 2021 sample ash collection because of planned plant outages. These applications are approved but no changes are necessary to the permit since these actions took place before this issuance.

The preliminary determination to modify this Air permit is tentative.

Procedure for public participation

As stated in Minn. R. chs. 7000 and 7001, there are three formal procedures for public participation in the MPCA's consideration of this matter. Interested persons may:

- (1) Submit written comments on the draft permit.
- (2) Petition the MPCA to hold a public informational meeting.
- (3) Petition the MPCA to hold a contested case hearing.

Submitting written comments

To submit comments or petitions to the MPCA through the mail or email, you must state:

- (1) Your interest in the permit application or the draft permit.
- (2) The action you wish the MPCA to take, including specific references to the section of the draft permit you believe should be changed.
- (3) The reasons supporting your position, stated with sufficient specificity as to allow the MPCA to investigate the merits of the position.

Public informational meeting

A public informational meeting is an informal meeting during which interested persons can ask questions concerning the proposed facility. MPCA staff will be present to provide information. If an interested person would like the MPCA to hold a public informational meeting, the person should include all information identified above and in addition include a statement of the reasons the person desires the MPCA to hold a public informational meeting and the issues that the person would like the agency to address at the public informational meeting.

Contested Case Hearing

A contested case hearing is a formal proceeding before an administrative law judge empowered to advise the MPCA regarding issues of fact. As described in Minn. R. 7000.1800, persons who submit petitions for a contested case hearing must also state the issues they propose to address in a contested case hearing, the specific relief requested or resolution of the matter, and the reasons (which may be in the form of proposed findings) supporting an MPCA decision to hold a contested case hearing. Failure to comply with these rules exactly may result in a denial of the request. To the extent known, the petitioner may also submit a list of prospective witnesses to be called at a hearing, a proposed list of publications, references, or studies to be introduced at a hearing and the approximate time required for the petitioner to present the matter at a hearing. The decision whether to hold a contested case hearing will be made under Minn. R. 7000.1900.