

Online Comment

Permit Portal: Air

3/16/2018

Comment:

Statement of Interest: The writer breathes air in various parts of Minnesota. The public notice for this permitting action (https://www.pca.state.mn.us/sites/default/files/Public%20Notice_71.pdf) indicates that the total limited potential to emit will be approximately 5.7 million pounds per year. (I have presumed that "PM" refers to Total Suspended Particulate and that the PM10 and PM2.5 quantities listed are not additive. Also, this total does not include 161,000 tons--322 million pounds--per year of carbon dioxide equivalent.) Emissions of this magnitude would make PolyMet one of the largest point sources of air pollution in Minnesota. Remarkably, PolyMet is near four Class I areas (which have special protections under the Clean Air Act): Boundary Water Canoe Area Wilderness, Voyageurs National Park, Isle Royale National Park, and Rainbow Lake Wilderness. Nonetheless, the MPCA claims in "Overview of PolyMet's air permit" (<https://www.pca.state.mn.us/sites/default/files/aq5-36q.pdf>) that: "The Class I modeling demonstrates that PolyMet's emissions, as limited by its permit, will not deteriorate air quality in nearby Class I areas. In addition, visibility impacts will be below perceptible levels. This conclusion is implausible. In the same document the PCA claims "PolyMet's Class II modeling demonstrates its stack and fugitive emissions will not exceed air quality standards." This conclusion is implausible. The MPCA also claims that "Each health impact evaluation showed PolyMet's emissions, as limited by its permit, would not result in unacceptable risks to human health." This conclusion is implausible. I am not clear on whether railroad equipment emissions and truck emissions on the PolyMet sites have been fully included in the fugitive emissions inventory. If not, as "on site" emissions they should be included. It does not appear, from the magnitude of the projected emissions, particularly the particulate emissions, that serious efforts to minimize emissions have been designed into this project. In many respects the proposed PolyMet project is in an area as sensitive to air quality impacts as it is to water quality impacts. The draft permit should not issue without serious re-evaluation. Respectfully submitted, Alan Muller

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Attachments: