



May 19, 2020

Minnesota Pollution Control Agency
c/o Pat Hanson
520 Lafayette Road N.
St. Paul, MN 55155

RE: Options for Addressing Environmental Contamination at the Freeway Landfill and Dump in Burnsville

Dear Mr. Hanson,

Thank you for requesting comments on the options that the Minnesota Pollution Control Agency (MPCA) is considering to address environmental contamination at the Freeway Landfill and Dump in Burnsville. Thank you as well for MPCA staff attendance at the April 27, 2020 study meeting of the Bloomington City Council, where MPCA staff presented information and answered questions. That meeting, along with the wealth of information offered on the MPCA website, clearly illustrate the dire environmental situation created by the location of these Burnsville landfills. Shockingly, the Freeway Landfill and Dump sites in Burnsville are:

- without a liner;
- below the natural water table;
- in a wetland;
- in a floodplain;
- adjacent to a major river;
- adjacent to a National Wildlife Refuge;
- adjacent to I-35W, the primary entrance to the Twin Cities Metropolitan Area from the south;
- near the water supplies of large cities; and
- near hundreds of homes.

Today, according to the MPCA website, groundwater contamination from the landfills “has migrated beneath and outside of the waste footprint” and “has been detected at levels exceeding regulatory criteria”. When the Kraemer Quarry stops dewatering, the water table will return to its natural level, above the bottoms of the unlined landfills, and spread the contamination through the groundwater.

Clearly, a landfill should never have been constructed in such a location. A new landfill, expanded landfill or replacement landfill should never again be allowed in such a location. Minnesota laws should be amended to ensure that does not happen. In this case, it did happen and there is no question that it needs to be cleaned up.

As the two landfills are cleaned up, Bloomington requests remediation that:

- Fully and permanently removes the threat of environmental contamination to the Minnesota River and, not far downstream, the Mississippi River;
- Minimizes the visual impacts of relocated waste;
- Minimizes the odor impact of waste relocation and of methane venting after waste relocation;
- Minimizes the noise impact during waste relocation; and
- Ensures that any reuse of the sites are compatible with nearby residential uses in Bloomington.

Bloomington strongly requests that the State of Minnesota pursue the “Dig and Haul” Option for addressing contamination at the Freeway Landfill and Freeway Dump. For the many reasons discussed above, the current location is a terrible location for waste. Keeping the waste on site, even in a fully lined configuration, presents risks for future contamination. Landfill liners are subject to fail. Even liners that don’t fail have limited lifespans. At the April 27, 2020 Bloomington City Council meeting, MPCA staff estimated the lifespan of a typical landfill liner to be between 50 and 400 years.

Because liners are not permanent solutions, the waste needs to be moved to a location where the consequences of escaping contamination are less severe. The waste needs to be moved to a location that is away from municipal water supplies, wetlands, floodplains, rivers and residential uses. The MPCA should rule out other landfills in sensitive environmental locations, such as the Burnsville Sanitary Landfill, as potential locations for the relocated waste.

Another benefit of the Dig and Haul Option is the shorter construction period. The MPCA website projects a three to five year construction period for the Dig and Haul Option as compared to five to eight year construction period for the Dig and Line Option. A shorter construction period will reduce the amount of time that nearby Bloomington residents will be exposed to noise and odor impacts.

Bloomington understands that the Dig and Haul Option is not the low cost option in the short term. However, when taking into consideration the value of avoiding the long term risks of locating waste in an environmentally sensitive location combined with the value of avoiding the negative, long term visual impacts of locating waste in a prominent location, the Dig and Haul is a better long term value. Also, to the maximum extent possible, the costs of relocating the waste should be passed on to the private parties that created the problem.

While Bloomington strongly favors the Dig and Haul Option, in the event that the State elects to pursue a Dig and Line Option, Bloomington strongly requests that any Dig and Line remediation place relocated waste, to the extent possible, on the Freeway Dump site instead of the Freeway Landfill site. The Freeway Dump site is farther from the Minnesota River and farther from residential uses in Bloomington. Given the smaller footprint of the Freeway Dump site, additional land adjacent to the Freeway Dump may need to be acquired or the waste may need to be split between the Freeway Dump and Freeway Landfill.

Bloomington also requests that any Dig and Line remediation be done in a manner that minimizes the height of a future landfill, understanding that minimizing the height will increase

the footprint. Given the prominent location of these sites near a major gateway freeway, near a major river, near a National Wildlife Refuge and near residential uses, doing whatever can be done to reduce the visual impact is vital.

The Bloomington City Council reviewed this comment letter at their May 18, 2020 regular meeting and formally authorized its submittal. Thank you for requesting and considering Bloomington's comments on this issue. We are available to discuss the comments and request to be updated as MPCA's decision making process moves forward. Please contact Glen Markegard, Planning Manager, at (952) 563-8923 or gmarkegard@bloomingtonmn.gov with updates or questions.

Sincerely,



Tim Busse
Mayor

Copy via e-mail: Bloomington City Council Members
 Bloomington Legislative Delegation
 Debbie Goettel, Hennepin County Commissioner
 Laura Bishop, Minnesota Pollution Control Agency Commissioner
 Sarena Selbo, Manager, Minnesota Valley National Wildlife Refuge