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greatriverenergy.com

February 22, 2019

Minnesota Pollution Control Agency
Attn: Ms. Yolanda Letnes
520 Lafayette Road North
St. Paul, MN 55155-4194

RE: Comments to Amend Minnesota Rules including Chapter 7045, Solid Waste Housekeeping Rule,
Minnesota State Register 43 SR 860-862

Dear Ms. Letnes:

Great River Energy appreciates the opportunity to comment on proposed additions to previously noticed Request for Comments to amend portions of the Minnesota Rules relating to “housekeeping” provisions. Great River Energy would like to comment, specifically, on the provisions of Chapter 7045 regarding episodic events.

As the Minnesota Pollution Control Agency considers modifying Chapter 7045 to incorporate the new federal generator requirements related to EPA’s Hazardous Waste Generator Improvement Rule, we would like to encourage MCPA to consider a modification to its existing episodic events provision as it relates to unplanned increased generation of hazardous wastes. There may be instances when unplanned over-generation events occur, and we respect the need to ensure adequate protection measures are taken with the storage of these increased quantities. We would like to suggest, however, that an appropriate grace period be instituted – such as 10 working days – to allow generators time to implement the newly applicable requirements associated with a larger generator status. This will help generators maintain compliance. We believe this is a workable solution to effectively mitigate risks and is preferential to an enforcement discretion approach.

Thank you for the consideration of Great River Energy’s comments. Please contact me if you have any questions (763-445-5212).

Sincerely,

A handwritten signature in cursive script, appearing to read 'Mary Jo Roth'.

Mary Jo Roth
Manager, Environmental Services