

IX. Rock-Tenn Community Advisory Panel Comments and Supplemental Recommendations

On August 18, 2008 the Rock-Tenn Community Advisory Panel (RCAP) finalized their review of the report on the Rock-Tenn Energy Facility Study authored by the Saint Paul Port Authority. By consensus, RCAP approved the following recommendations to be included as Chapter IX of the report and forwarded to District Councils 11, 12, 13 & 14 as well as the Saint Paul City Council.

Qualifiers

The statements below apply to all our findings and recommendations and serve as overall statements regarding implementation of the next stage of the project.

1. In principle, RCAP believes there should be equal duration of public commitment and the commitment of Rock-Tenn.
2. RCAP, in its approval of the findings and recommendations, assumes that on-site use of fuel oil at the Rock-Tenn plant site will be minimized.
3. RCAP has not reviewed the data about the potential environmental impacts of any anaerobic digestion facilities. The endorsement of any of the Study's recommendations and alternative proposals should not be seen to imply that we have reviewed the environmental impacts of biogas production.
4. As the project proceeds, the development of each option must include a process for gathering local input, participation and support.
5. Appropriate environmental safeguards should be used to assure that any biogas facility (anaerobic digesters) manufacturing biogas for Rock-Tenn meets the highest health and environmental standards achievable in the community where the facility is located.

Recommendations

1. RCAP endorses the preferred option put forth by the SPPA to offset the combustion of natural gas with the production of biogas derived from anaerobic digestion.
2. In the event that the preferred recommendation is not successful, RCAP endorses alternative #1 with the assurance that the fuel used by the turbine will be exclusively natural gas (or biogas).
3. RCAP cannot give unqualified support to Alternative #2 due to the lack of sufficient information on environmental performance and economics. Of the solid-fuel combustion options gasification has the potential to be the most benign.

However, if this alternative is explored, RCAP recommends that it be reconvened to vet the economic and environmental details.

4. RCAP recommends that Refuse Derived Fuel (RDF) combustion be removed from future consideration as a fuel source for Rock-Tenn.
5. Minnesota statutes treat RDF as a renewable energy source, and RDF is accordingly an eligible fuel for the proposed power plant. As a practical matter, the RCAP does not view RDF as renewable. A large fraction of the energy available from the thermal conversion of this material comes from plastic, which is currently derived almost completely from fossil fuels.
6. RCAP recommends the continued pursuit of energy conservation. It will produce the greatest savings and most positive environmental and health impact.
7. Process heat reuse and recycling can reduce total energy demands at Rock Tenn by at least 20%, while providing a large amount of surplus low-temperature heat for sale to and use in the surrounding area. Reduced demand, plus surplus energy sales will contribute to lowering Rock Tenn's overall energy costs. RCAP encourages Rock-Tenn and partners to distribute to other users any surplus low-grade energy that may be available as a result of continued conservation efforts.

Additional Findings

1. RCAP supports implementation of comprehensive zero waste strategies for the city of Saint Paul.
2. RCAP endorses solar, wind and metropolitan area biogas production because of the environmental and health benefits they provide. We recommend they be included as strategies in meeting Rock-Tenn's overall energy needs if doing so can add value to the economics of the current or future facility.