National Pollutant Discharge Elimination System / State Disposal System Permits, Water Quality Standards, and Municipalities

Minnesota Pollution Control Agency

January 2016

Legislative charge

This report fulfills the requirement of Laws of Minnesota 2015, First Special Session chapter 150, article 4, section 101. This law changed the language of Minn. Stat. § 115.44, subp. 9.

The agency shall report on the activities the previous calendar year to implement standard and classification requirements into National Pollutant Discharge Elimination System/State Disposal System (NPDES/SDS) permits held by municipalities. This includes:

- A summary of permits issued or reissued, including any changes to effluent limits due to water quality standards adopted or revised during the previous permit term.
- Highlights of innovative approaches implemented by the agency and municipalities to develop and achieve permit requirements in a cost-effective manner.
- A summary of standards development and water quality rulemaking activities over the previous calendar year, including economic analyses.
- A summary of standards development and water quality rulemaking activities anticipated for the next three years, including economic analyses.
- A process and timeframe for municipalities to provide input to the agency regarding their needs based on information provided.
- A list of anticipated permit initiatives in the next calendar year that may impact municipalities.
- The agency's plan for involving municipalities throughout the planning and decision-making process, including opportunities for input and public comment from municipalities on rulemaking initiatives prior to preparation of statement of need and reasonableness.

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Foreword

This report includes a description of activities that occurred during the previous calendar year to implement water quality standard and classification requirements into National Pollutant Discharge Elimination System/State Disposal System (NPDES/SDS) permits held by municipalities.

The purpose of this report is to share information with municipalities about permitting-related activities that have occurred over the past year and that are anticipated for the near future, to:

1. Foster awareness of and engagement in Minnesota Pollution Control Agency (MPCA) initiatives that may affect municipalities.
2. Promote coordination and dialogue between the MPCA and municipalities on permitting and water quality improvement efforts.

Contents

Permitting summary

This section includes a summary of permits issued or reissued during the previous calendar year; including any changes to permit limits (ie. effluent limits) due to water quality standards (WQS) adopted or revised during the previous permit term. Figure 1 illustrates the difference between WQS and permit limits and how they are related.

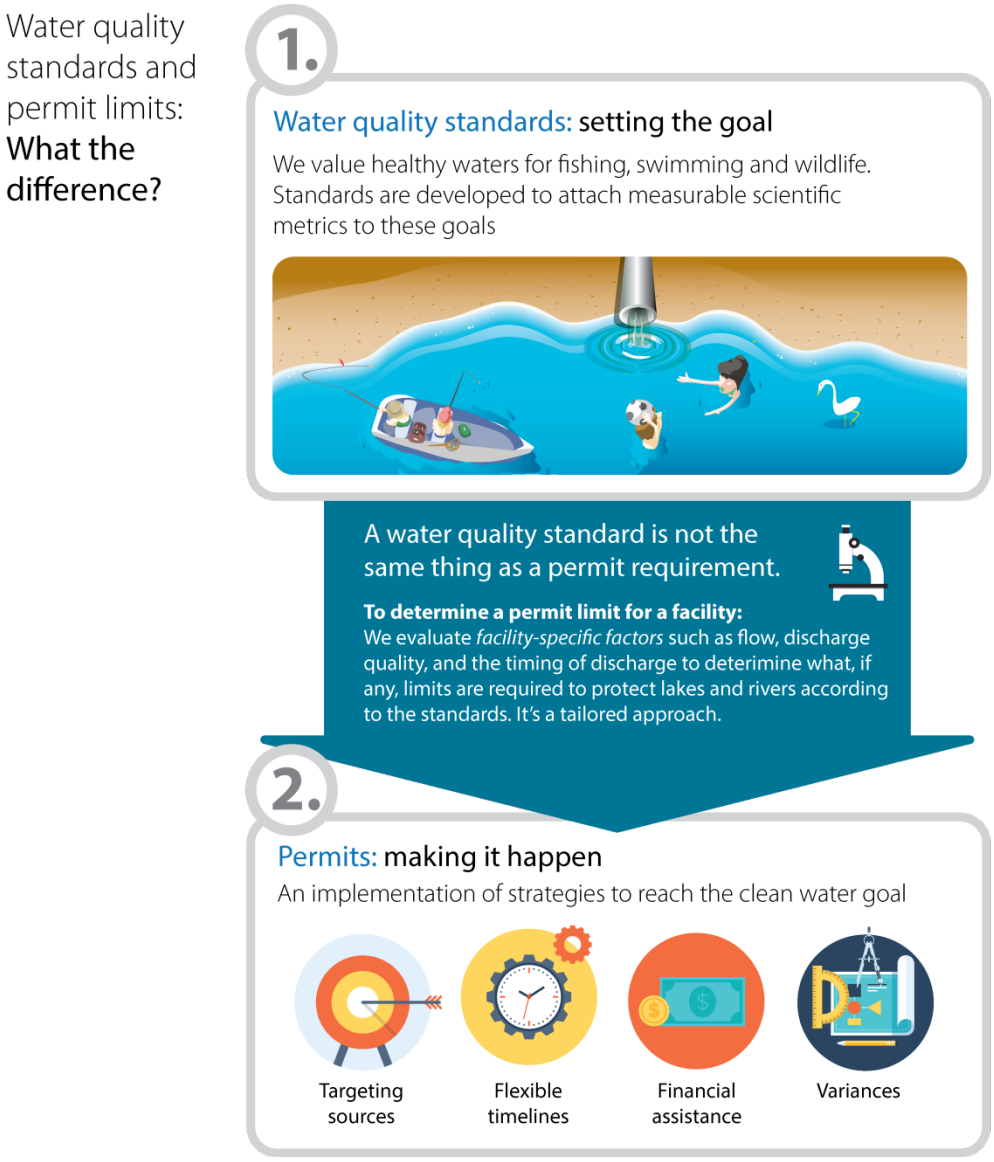

Figure 1

In the past five years, Minnesota Pollution Control Agency (MPCA) has adopted three significant changes to Minnesota WQS:

1. Adopting new river eutrophication standards (RES) in 2014.
2. Replacing the turbidity standard with total suspend solids standards in 2014.
3. Adopting new methods for developing human health-based standards in 2015. Note that MPCA has not yet employed these new methods to update any standards for specific chemicals.

There are a total of **588** municipal facilities that treat wastewater in Minnesota. The waste is primarily domestic, although some communities also treat wastewater from industry.

Of those facilities, **528** have a National Pollutant Discharge Elimination System (NPDES) / State Disposal System (SDS) permit, meaning they discharge to a surface water and have the potential to receive water-quality based effluent limits (WQBELs). These limits are based on water quality standards (WQS) designed to protect primarily fishing and swimming in receiving waters. This means that **60** facilities do not discharge to surface water. Instead, they have an SDS permit, which allows activities such as spray irrigation, rapid infiltration, or other methods of managing treated wastewater via soil treatment and infiltration to groundwater.

NPDES/SDS permits have a five year term. In 2015, there were **40** municipal permits reissued or modified. Of those, **nine** facilities discharge to soil/groundwater and include conditions to protect potential sources of drinking water. This means **31** of reissued or modified permits in 2015 involved a discharge to surface water.

Of those 31 permits, **13** had no changes based on WQBELs. Examples include the cities of Elk River, Kenyon, Hoyt Lake, and Palisade.

This leaves **18** facilities that experienced a change in their permit based on WQBELs.

Of those 18 permits, **15** had changes that were *not* associated with WQS that we adopted or revised in the previous term of the permit. The following is a brief summary of those permits:

- **Six** permits were changed due to a change in the frequency that permittees are required to report phosphorus monitoring results. The change was from a "Calendar Year-to-Date Total" to a "12-Month Total and from a "Calendar Month Average" to a "12-Month Moving Average." This change was made by the MPCA to simplify the reporting process. In essence, there was no change to the actual permit limits for these permits. This includes the cities of Cambridge, Comfrey, Gilbert, Lakefield, Rice and Saint Francis.
    - The City of Rice also received a new phosphorus limit that will go into effect two years following permit issuance (12/27/2017). It is based on the protection of downstream Lake Pepin, not on standards adopted or revised in the previous five years.
    - The City of Gilbert also received new mercury limits in its reissued permit. While the mercury standard was not newly adopted, it was not until this permit reissuance that the MPCA had sufficient data to decide if mercury limits were needed at the Gilbert facility. There is a compliance schedule in the permit that allows time to research options for compliance; Gilbert may also apply for a variance from the new mercury limit.
- **One** permit (City of Adams) had a change to the loading limit for ammonia nitrogen from kilograms per day to kilograms per year, which amounted to a reporting change, not a change in the permit limit. The city also received new mercury limits. Again, the mercury standard was not newly adopted, but it was not until this permit reissuance that the MPCA had sufficient data to decide if mercury limits were needed. There is a compliance schedule in the permit that allows time to research options for compliance; the city may also apply for a variance.

- **One** permit had a change in phosphorus loading limits, and an innovative permit approach was used. It is described in the next section of this report. (See 'Princeton Trade – point to non-point').
- The remaining **three** facilities (East Gull Lake, Sacred Heart, and Waterville) had changes due to flow-composite sampling changes, plant upgrades to meet phosphorus and Total Residual Chlorine (TRC) limits based on standards that were adopted prior to the last permit cycle, and facility expansion, respectively.

Four permits included new effluent limits based on the 2008 adoption of lake eutrophication standards designed to protect lakes and reservoirs from the effects of too much algae. The changes in permit limits based on lake eutrophication standards are summarized in the following table.

Permit name	Changes from previous permit
Freeborn WWTP	Added a phosphorus limit of 98 kg / year 12-month moving total based on draft Lake Pepin TMDL.
Met Council - Mississippi Basin Total Phosphorus	See explanation in next section, titled Flexible Phosphorus "umbrella" permit*
New Ulm WWTP	· Developed a Mass Limits Calculation Station that resulted in changed loading limits from the previous permit by combining the discharges from two discharge points. · Added a Phosphorus 12-month Moving Total of 7,482 kg/yr based on the draft Lake Pepin TMDL. This is also protective of the river eutrophication standards adopted in 2014.
Saint James WWTP	· Added a phosphorus 12-Month Moving total limit of 3,721 kg/yr based on draft Lake Pepin TMDL. · Included a compliance schedule to meet salty parameter limits (chloride, total dissolved solids, bicarbonates, hardness and specific conductance) by December 31, 2017.

*This permit affects five different Met Council permits.

Finally, there were **three** facilities that received new or revised limits in their permit due to WQS adopted or revised during the previous term – all due to the river eutrophication WQS adopted in 2014. Each of those three permits also included new discharge limits to protect downstream lakes and/or reservoirs. As noted above the lake eutrophication standards were not adopted within the previous permit term. The changes to the WQBELs in those three permits are listed here:

Permit name	Permit changes due to standard change in the previous permit term	Additional permit changes
Saint Peter WWTP	New phosphorus limit of 11.8 kg/day from June - September based on river eutrophication standards.	· New phosphorus limit of 4421 kg/year (12-month Moving Total) based on draft Lake Pepin TMDL. · New total mercury limits of 10.2 ng/L (Calendar Month Average) and 19.3 ng/L (Daily Maximum) based on sufficient data to determine a reasonable potential to impact the water.
Welcome WWTP	New phosphorus limit of 1.3 kg/day from June-September based on river eutrophication standards.	· New phosphorus limit of 359.2 kg/year (12-month Moving Total) based on draft Lake Pepin TMDL. · New ammonia seasonal limits based on new data, more information on CBOD5 (versus BOD5), and addition of nitrification.
Willmar WWTP	New phosphorus limit of 22.1 kg/day from June-September based on river eutrophication standards.	· New phosphorus limit of 8,300 kg/year (12-month Moving Total) based on draft Lake Pepin TMDL. · Permit includes a compliance schedule to meet salty parameter limits by April 30, 2035.

The above summary of changes to permits issued during the previous year highlights the fact that changes in WQS do not immediately result in new permit limits. Instead, as permits come up for reissuance on a five year schedule, the need for new limits is evaluated based on specific data from the facility and receiving water along with other watershed and facility-specific considerations.

Innovative approaches

This section highlights innovative approaches implemented by the MPCA and municipalities to develop and achieve permit requirements in a cost-effective manner.

River eutrophication standard limits development

MPCA considers the need for phosphorus discharge limits using a watershed approach. During this evaluation phosphorus from all major sources is considered concurrently. Where multiple sources discharge upstream of a water of interest, limits are developed in consideration of the facility size and capability, relative to the total load reduction necessary to protect for river and lake eutrophication standards. This approach allows control of phosphorus using economies of scale and achieves more efficient and economical reductions. (For example, load reductions can often be achieved at large facilities at less cost than at smaller ones).

This economy of scale approach is both protective of water quality and minimizes costly upgrades at smaller treatment plants. For example, the City of Welcome Wastewater Treatment Plant (WWTP) permit reissued in 2015 includes a new TP limit based on RES. The new limit is 1.3 kg/day, June through September, and became effective April 10, 2015. A concentration of 0.9 mg/L TP will meet this mass limit under most conditions. If the MPCA was not taking a watershed approach to setting TP limits, the limit for the facility could be as low as 0.32 mg/L. As highlighted by this example, new TP limits are being implemented considering economies of scale and the amount of time it will take facilities to come into compliance.

Out of a total of 80 watersheds statewide, 10 phosphorus watershed reviews are complete and an additional 22 are in progress. The need for phosphorus limits for facilities in the remaining watersheds will be evaluated during the next two years (2016, 2017).

A public meeting is being scheduled for February 11, 2016 to explain the procedures for implementing river eutrophication standards. This seminar will include examples and time for questions and answers. The meeting will be webcast to reach interested parties in greater Minnesota. The MPCA is creating a list of individuals who represent various municipalities across the state and are inviting them to personally attend. The list includes professional engineers (from cities and consulting firms), WWTP contacts and other non-governmental stakeholders. We are also hoping to invite representatives from EPA Region 5, Wisconsin and Iowa. In order to enhance participation, cities are welcome to contact MPCA staff member Joel Peck, whose contact information is at the end of this document.

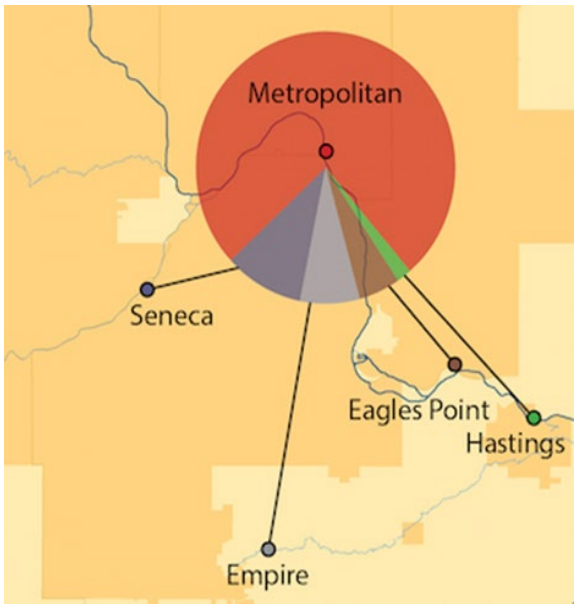

Figure 2

Flexible phosphorous “umbrella” permit

Water quality goals for Lake Pepin and the Mississippi River require significant reductions of phosphorus from many upstream wastewater facilities. The phosphorus umbrella permit issued to the Metropolitan Council in September 2015 establishes one phosphorus limit for five Met Council facilities, allowing Met Council to flexibly manage the phosphorus load from the five facilities. Figure 2 visually depicts the total amount of phosphorus that the five facilities can discharge to the Mississippi. This permit allows the Met Council to decide which facilities get the bigger pieces – more of the phosphorus pie – and which get smaller pieces – less of the phosphorus pie. The end result – the combined total phosphorus level discharged from the five plants– is the same, but Met Council has the ability to decide how they will manage their phosphorous treatment to achieve the required reductions.

This flexible permitting approach is designed to achieve the overall water quality goals for the Mississippi and Lake Pepin, while allowing the Met Council to optimize its investments, better control costs and accommodate future needs in a growing metropolitan area.

Princeton Trade - point to non–point

Reducing phosphorus that causes algae in lakes and rivers is the goal of the innovative approach included in the permit for the City of Princeton. The city, population 4,700, discharges its treated

wastewater to the Rum River, a tributary to the Mississippi River upstream of Lake Pepin. The city is using pollutant trading to offset the phosphorus in its discharge. The permit, issued July 24, 2015 includes a trade ratio that requires the city to remove 2.6 times the amount of phosphorus via restoration projects than the discharge amount permitted from its facility. To do so, the city has completed five streambank restoration projects to prevent sediment, containing about 10,700 pounds of phosphorus per year, from entering the Rum River.

This is the first trade of its kind involving a municipal wastewater facility in Minnesota, using reduction in unregulated pollution (nonpoint source) to offset regulated pollution (point source). MPCA is hopeful that this successful example will inspire and inform other Minnesota communities looking to meet low phosphorus discharge limit requirements without installing additional wastewater treatment.

This innovation reflects statutory changes made by the 2014 Legislature to support pollutant offsets between permitted and non-permitted sources. These efforts have reduced the amount of soil – and phosphorus attached to it – going into the river at a much lower cost than adding more treatment at the wastewater facility. Overall, these approaches save money while protecting water quality.

Variance rulemaking

A water quality variance is a temporary change in a state water quality standard for a specific pollutant that allows for a less restrictive discharge limit. A variance allows a permittee, such as a municipal wastewater treatment facility, additional time to meet the applicable standard. The cost of treatment and the impact on residents may prevent the permittee from complying with a discharge limit in the foreseeable future. Variances are one permitting tool that allow for extra time. Variances must be reviewed prior to being renewed to account for the fact that the cost of treatment and other economic factors may have changed, so the effluent limit may be within reach. Federal rules allow states to grant and implement WQS variances, but require U.S. Environmental Protection Agency (EPA) to review and approve variances granted by the states.

The MPCA is nearing the end of a rulemaking effort to update Minnesota's rules governing water quality variances. Currently Minnesota's water quality rules have variance provisions in three different chapters. The procedures for granting a variance vary by chapter, and these differences have been confusing to regulated parties. This also makes it difficult for the MPCA to maintain consistency in the variance process and compliance with federal requirements. The proposed rule revisions are intended to address these differences and make the changes needed to align Minnesota's variance rules with recently updated federal requirements. The proposed rules will bring more consistency and transparency to the variance process and will provide municipal and other NPDES/SDS permittees a better understanding of when a variance is a viable permitting tool for their facility.

An example of the use of a variance involves Western Lake Superior Sanitary District (WLSSD), which treats the wastewater of Duluth and surrounding communities and discharges to the St. Louis River just upstream of Lake Superior. In 2015, MPCA drafted a permit for WLSSD that includes a variance for mercury. Lake Superior is protected by some of the strictest standards for mercury in the state. While WLSSD has been very successful in reducing mercury in its discharge to extremely low levels, the facility still cannot quite meet the limit based on the Lake Superior Basin mercury standard. Installing the technology to fully control for mercury is not yet feasible for WLSSD. Therefore the draft permit includes a variance that authorizes WLSSD to discharge mercury at a level higher than the current standards call for, while requiring them to work towards fully achieving the necessary mercury reductions. As of the publication of this report, EPA is still reviewing the mercury variance request. If approved, the variance

will allow WLSSD time to maximize current operations and evaluate additional economically achievable options for further reducing mercury in their discharge.

Proposed streamlined chloride variance process

MPCA staff has been working on a process through which municipalities may more efficiently apply for a variance to chloride WQBELs. Part of the variance process includes an evaluation of treatment technologies, water quality data and economic conditions to determine if a variance is justified due to technology or cost limitations. This analysis is typically completed by the permittee or their consultant, at significant expense to the permittee. Given that complying with the chloride standard is currently very challenging due to technology and economic limitations, MPCA anticipates that a number of municipalities may apply for chloride variances in the near future. To assist in this effort and reduce the costs for municipalities, MPCA is completing the necessary analysis of available water quality data, wastewater treatment technologies and cost data. The MPCA will use the analysis to support a streamlined chloride variance process. MPCA has been communicating with EPA on a weekly basis so the process can move more quickly once a city decides to apply. This will save cities time and money by not having to hire consultants to prepare the necessary variance documents.

Municipal treatment of sulfate and salty parameters

MPCA has been recommended for $180,000 in funding from the Legislative-Citizen Commission on Minnesota Resources (LCCMR) to evaluate and summarize potential sulfate and salty parameter treatment technologies, along with their associated costs and implementation concerns for representative wastewater treatment plants. The need to understand treatment options for salty parameters is timely. The MPCA is in the process of updating WQS for sulfate and other salty constituents like hardness and total dissolved salts. In advance of those changes it is important to understand treatment options and cost implications for municipal and other wastewater dischargers.

Municipal WWTPs are not designed to remove sulfate or salty parameters from their wastewater. In order to remove sulfate or salty parameters, a treatment plant would need to upgrade or change their treatment processes. The goal of the LCCMR project is to critically evaluate potential sulfate and salty parameter treatment technologies in order to provide essential support to municipalities in Minnesota. If this information were made available to municipalities, they would not have to incur costs of hiring consultants to evaluate it on a project-by-project basis.

MN Wastewater Think Tank

The 2013 Legislature provided funding for two parallel efforts:

1. MN Wastewater Think Tank headed by the University of Minnesota.
2. Funding for wastewater treatment facilities to pilot treatment technology for low-level treatment of nutrients and / or treatment of contaminants of emerging concern.

The MN Wastewater Think Tank includes wastewater experts not just from Minnesota, but from around the country. The goal of the Think Tank is to identify the biggest wastewater challenges facing Minnesota and to work collaboratively across disciplines to meet those challenges. Wastewater-related concerns such as low-level phosphorus and nitrogen removal have been identified and different potential solutions examined. Most recently, the group spent two days visiting a number of treatment plants in the Hampton Roads Sanitation District in the state of Virginia where unique treatment technologies are being used to provide advanced nutrient removal. A final report will be created summarizing the issues that have been examined along with recommendations for future activities.

Three wastewater treatment facilities (Mankato, St. Cloud and Windom) received grant funding to conduct pilot testing of treatment technologies. The City of Mankato's project examines chemical addition and membrane filtration to achieve low levels of phosphorus. St. Cloud's project examines the potential for mining struvite from the bio-solids system. Struvite is a precipitant of magnesium ammonium phosphate that causes operational problems in the bio-solids system. Windom's project examines the effectiveness of denitrification using a number of different technologies in an effort to remove nitrate from the effluent. Final reports for all projects are due by June 30, 2016.

Financial assistance for advanced treatment at municipal WWTPs

Since 2007, the Point Source Implementation Grants (PSIG) and its predecessor programs have provided over $60 million in grants to 79 communities to help meet Total Maximum Daily Load (TMDL) or WQBEL permit limits. The funding has been used for construction projects to upgrade treatment facilities to meet more stringent limits on pollutants such as phosphorus, mercury and nitrates. PSIG grants are awarded by the Public Facilities Authority (PFA) in conjunction with other state grant and loan programs based on project priorities and eligible costs determined by the MPCA.

As a result of intensive monitoring, we have a better understanding of the chemical and biologic condition of waters across the state. At the same time, we continue to learn more about how pollutants impact aquatic life and recreation. The requirement to effectively protect and restore waters may necessitate additional discharge limits and treatment beyond primary and secondary treatment standards. The PSIG program is intended to help cover some of the costs of upgrading treatment systems to meet additional limits. To date, this program has funded all municipal projects that have completed the necessary technical review and approvals to be eligible for a grant.

After years of monitoring requirements, some wastewater treatment plants are now getting new limits for chlorides. There are a variety of treatment approaches that could be implemented to meet the chloride permit limit including changing the treatment process at the municipal drinking water plant. The statutory language for the PSIG program was amended in 2015 to expand eligibilities to include changes to drinking water treatment facilities when necessary to meet the city's wastewater discharge requirements. The Minnesota Department of Health (MDH) and the MPCA will coordinate review and technical approval so these projects can be constructed in a timely manner.

For more information, see the Clean Water Fund Performance Report (2016), Action Measure: Number of municipal point source construction projects implemented with Clean Water Funding and estimated pollutant load reductions. http://www.legacy.leg.mn/funds/clean-water-fund/clean-water-fund-performance-reports.

Water infrastructure listening sessions

This fall the MPCA and MDH Commissioners, along with PFA executive director and staff from the Governor's office held listening sessions in the cities of Detroit Lakes, Willmar, Worthington, Hibbing, Pine City, Rochester, Golden Valley and Hastings. The goal of the sessions was to hear the concerns of municipalities regarding wastewater and drinking water infrastructure needs.

Nearly 100 communities were represented. Communities expressed concerns about the costs of maintaining aging infrastructure and needing to make improvements and upgrades to both wastewater and water supply facilities. There is a universal concern over the expense of these projects and the impact to residential fees. Some of the concerns heard are listed here (in no order):

- If money is spent repairing or upgrading treatment plants, no money is left for repairing collection systems. If a city takes on more debt, then it risks its credit rating. Some standards are difficult to meet.
- Chemicals for treating phosphorus can be damaging to equipment. Also, chemicals can degrade receiving waters.
- Cost estimates for the work that needs to be done are rising rapidly. The estimated project costs developed by city engineers are often far below the bids that cities are receiving for the work they want to do.
- Clear standards are needed for water re-use.
- Lack of resources to do adequate project/asset management/planning.
- Border communities fear losing businesses to neighboring states over higher utility rates.
- Many communities feel they do not have an adequate population/tax base to pay for the infrastructure improvements they need to make and at the same time often do not qualify for the grants and other funding sources that are currently available to pay for infrastructure improvements.

Many communities mentioned they want regulatory agencies to be flexible and work closely with communities to come up with ways to meet regulations while giving communities time and assistance to meet those requirements. The need for connections and outreach between state agencies and municipalities was clearly expressed. This report is one method of outreach to notify municipalities of upcoming standards and innovative permitting approaches being done by the MPCA.

Summary of standards development

This section includes a summary of standards development and water quality rulemaking activities over the previous calendar year, including economic analyses. At any given time, the MPCA is working on a number of projects to update, revise, develop or improve Minnesota's WQS. The process to develop and promulgate WQS is long. Once the technical basis and other supporting documents for a standard are developed, the standard must go through Minnesota's formal rulemaking process. This includes at least two opportunities for the public to comment on the proposed rule. Then, after a WQS is adopted, the WQS must be approved by the federal EPA before it is effective and can be used to protect Minnesota's lakes, rivers, streams, and wetlands.

The inventory linked below provides an overview of WQS projects the MPCA is working on or has prioritized for 2014 – 2016. It also includes project status. This report was required by Session Law (Laws of Minnesota 2015, 1st Spec. Sess. chapter 150, article 4, section 100) and is titled "Inventory of Current Water Quality Standards Projects, 2014 to 2016".

Economic analysis is conducted throughout rulemaking, but is formally documented in the Statement of Need and Reasonableness (SONAR). The SONAR can be found on the webpages referenced in the first column of the document linked above. It is important to note that although a triennial review of water quality standard is done every three years, new or modified standards can be adopted at different times. Therefore, the MPCA has webpages devoted to different WQS rulemaking projects. Each of these pages includes documents detailing the scientific analysis and rulemaking timeline. It would be redundant to include them all in this report, so please reference the links in the document above for more details.

Standards in the next three years, including economic analysis

The previously reference document titled "Inventory or Current Water Quality Standards Projects" summarizes the ongoing WQS work as well as the consideration of economics, including anticipated future projects. The WQS topics selected as priorities for 2014 to 2016 are subdivided into three tiers (1, 2 or 3). The tiers identify the WQS topics of highest priority. The report also identifies WQS projects nearing or in rulemaking and moving to completion.

Another document that includes future WQS rulemaking (and other media) is MPCA's Public Rulemaking Docket.

The 2015 Legislature provided funding for a new MPCA environmental economist. This fall the MPCA posted that position, and the successful applicant started in December. The addition of this position will significantly enhance our ability to perform economic analyses related to regulatory and policy activities for water quality protection. The new economist's work at the MPCA will focus on how to more clearly evaluate and quantify benefits, costs, incentives, and impacts of WQS rulemaking using economic principles and statistical techniques.

Permit Initiatives

The 2015 Legislature, creating the requirement for this report, called for a list of anticipated permit initiatives in the next calendar year that may impact municipalities and the agency's plan for involving the municipalities throughout the planning and decision-making process. In addition to the standards development efforts noted previously, MPCA anticipates the following permit initiatives in the next year:

- As referenced above, MPCA will continue work on a chloride WQS Variance process. Updates can be obtained through the WQ Variances webpage.
- As described previously the MPCA will be hosting a webcast regarding river eutrophication standards and how analysis is being done to develop permit limits. This is planned for February 11, 2016. MPCA is starting work to revise the Class 3 and 4 WQS designed to protect surface water for industrial production and agricultural uses. The revisions to the standards will incorporate new science and will alleviate the burden on NPDES/SDS permit holders that discharge to receiving waters currently protected for these uses. For example, water bodies will be assessed for whether industrial consumption (Class 3) is occurring or has occurred. If not, and there are no plans for this water body to be used for industrial consumption, MPCA will not need to set effluent limits to protect this use. Implementation is still being considered and public notice on the rule changes are planned soon.
- Finally, MPCA continues to implement its new permitting database, Tempo.

MPCA's involvement of municipalities

MPCA strives to involve municipalities throughout the permitting and water quality standard rulemaking processes. This includes opportunities for input and public comment from municipalities on rulemaking initiatives prior to preparation of any statement of need and reasonableness (required under section 14.131).

The easiest way to stay current with WQS development and adoption is to sign up for GovDelivery notices on the MPCA's WQS webpage: http://www.pca.state.mn.us/qzqh1081. Opportunities for public input on WQS occur with adoption of standards into Minnesota rule, and with the every three year's triennial standard review, which opens all of Minnesota's WQS for public review and comment. More specific information about opportunities to comment on standards proposed for adoption is available here: http://www.pca.state.mn.us/index.php/view-document.html?gid=16321.

Municipal needs covered in this report and chances for input

During the 2015 legislative session, MPCA received funding for a Municipal Liaison. The successful applicant, Joel Peck, started in December. His primary work will be to build and foster relationships with municipal administrators and wastewater professionals, and to help implement ways to refine MPCA processes and requirements to assist municipalities while maintaining environmental protection goals.

It is the intent of the MPCA that the liaison's work will be two-way: informing and assisting municipalities, and advocating for municipalities within MPCA. The goal is to help MPCA improve processes and practices without compromising our collective WQ goals. He will also provide outreach on the basis and need for new and proposed water quality regulations with potential to impact wastewater facilities; specifically, assisting municipal facilities in understanding the impact on financial resources.

The primary objective is to develop a better process to reduce frustrations and obstacles between municipalities and MPCA as it relates to WQS and permits. As one example of this effort, MPCA municipal permit staff, including Joel, will be available at the Wastewater Operators Conference in March 2016.

MPCA is hoping to receive comments from individuals or municipalities on this report, and those comments can be submitted at any time. Comments provided this year will be incorporated into the 2016 report. Please submit comments to Joel Peck. He can be reached at 651-757-2202 or joel.peck@state.mn.us.