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





Minnesota Pollution Control Agency

January 2017

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 statements of need and reasonableness.

Authors

Elise Doucette

Contributors/acknowledgements

Casey Scott Steve Weiss Bruce Henningsgaard Gerald Blaha Scott Kyser Nicole Blasing Catherine Neuschler Cathy O'Dell Laura Dobbins Joel Peck The MPCA is reducing printing and mailing costs by using the Internet to distribute reports and information to wider audience. Visit our website for more information.

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Minnesota Pollution Control Agency

520 Lafayette Road North | Saint Paul, MN 55155-4194 |

651-296-6300 | 800-657-3864 | Or use your preferred relay service. | Info.pca@state.mn.us

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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.

Acronyms

CWRF	Clean Water Revolving Fund
EPA	United States Environmental Protection Agency
NPDES	National Pollutant Discharge Elimination System
SDS	State Disposal System
WIF	Wastewater Infrastructure Fund
WWTP	Wastewater Treatment Plant

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Permitting summary

This section includes a summary of permits issued or reissued during the previous calendar year, including any changes to permit limits (i.e. effluent limits).

Adopted and revised standards

This report is focused on limits in those permits based on water quality standards (WQS) adopted or revised during the previous five-year permit term. Therefore, this section includes permit limits based on the following water quality standard changes:

- 1. River eutrophication standards, adopted in 2014.
- 2. Total suspended solids standards replacing turbidity standards, adopted in 2014.
- 3. New methods for developing human health-based standards, adopted in 2015.
- 4. Water quality variance procedural rules, adopted in 2016.
- 5. Antidegradation rules adopted in 2016, updating previously titled 'nondegradation' rules

Of the above, only the river eutrophication standards have resulted in changes to water quality-based effluent limits (WQBEL). The extent of those changes are further described below.

The second change, to the turbidity standards, revised an outdated method of detection and clarified the level of suspended solids consistent with protecting the waterbody. Permittees are already using the most updated method of detecting solids, so this standard change did not result in any changes to permits. The third, new methods to develop human health-based standards, were adopted to incorporate the latest information and risk assessment practices for ensuring that human users of Minnesota surface waters are fully protected. For example, these methods incorporate new exposure and toxicity information to better protect infants and children from developmental effects, as well as take into account higher rates of drinking water use and fish consumption. The Minnesota Pollution Control Agency (MPCA) has not yet employed these new methods to update any standards for specific chemicals.

The remaining two changes, water quality variances and anti-degradation, relate directly to permitting procedures, but have not impacted any permits issued in 2016. The changes to the variance rules will result in variance procedures that are more relevant and easier for permittees to use in the future, providing flexibility when meeting an effluent limit is not economically feasible. The antidegradation rules also focus on prudent and feasible options for avoiding impacts to water quality.

Municipal permittees

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** discharge to a surface water and have the potential to receive WQBELs based on WQSs designed to protect receiving waters, primarily for fishing and swimming. Therefore, **60** facilities do not discharge to surface water; instead, treatment is composed of spray irrigation, rapid infiltration, or other methods of treatment via soil infiltration to groundwater.

In 2016, **52** permits were reissued or modified. Of that, **24** discharged to soil and groundwater and **28** discharge to surface water. Permits that discharge to surface water receive National Pollutant Discharge Elimination System/State Disposal System (NPDES/SDS) permits. Permits that discharge to soil

and groundwater receive SDS permits. In 2016, all but one of these SDS permits matched the above description. The outlier is the city of Bejou which is a surface discharging facility located in tribal land. The MPCA is not delegated the authority to issue NPDES permits to facilities located on tribal land. Therefore, the NPDES permit requirements are issued by U.S Environmental Protection Agency (EPA). MPCA issues an SDS permit to ensure compliance with the state rules and regulations.

Of these **28** permits that discharge to a surface water, **13** did not have any substantive changes in permit limits. If any changes were made, it was a result of our new permitting database (Tempo) being released, and correcting migrated data. For example, the permit for the City of Hinckley WWTF needed to be modified to correct the significant digits used in reporting pH. The limits were corrected to reflect the difference from 8 to 8.0; an important distinction for rounding purposes. In other permits, the existing limits were protective of surface water and no changes were needed upon review of the data.

A total of 15 permits have new water quality-based effluent limits.

Two permits received limits for mercury. It is important to note that mercury is *not* a new WQS; it was adopted in 1998. The Great Lakes region, including sections of Minnesota, is protected by more stringent mercury standards. Both of the impacted facilities are located in the Lake Superior Basin – Silver Bay Wastewater Treatment Plant (WWTP) and Western Lake Superior Sanitary District (WLSSD). Enough data has been collected to show that these facilities have a reasonable potential to exceed the water quality standard. The city of Silver Bay was given an interim limit and a compliance schedule that allows them until 2020 to comply with the final mercury limit. WLSSD requested and was granted a variance for the mercury limit. While WLSSD has been very successful in reducing mercury in its discharge to extremely low levels, the facility still cannot consistently meet the final limit. Installing the technology to fully control for mercury is not yet economically feasible for WLSSD. Therefore, the permit includes a variance that authorizes WLSSD to discharge mercury at a level higher than the current standard calls for, while requiring them to work towards fully achieving the necessary mercury reductions.

Overall, **13** facilities received new phosphorus limits. Some of them had phosphorus limits in their previous permit based on their proximity to downstream lakes. Others had limits based on State Discharge Restrictions (Minn. R. 7053.0255) adopted in 2008. Because of the concern for nutrient effects on rivers and Lake Pepin, most facilities will now receive phosphorus limits.

MPCA began taking an innovative watershed approach to setting phosphorus limits in 2014/2015. During these evaluations, phosphorus from all major sources is considered concurrently. Where multiple sources discharge upstream of a water of interest, limits are developed that consider facility size and capability relative to the total load reduction necessary to protect for river and lake eutrophication standards. On occasion, slightly more restrictive limits at a larger facility can provide tremendous relief to smaller neighbors while still meeting environmental goals. Larger facilities generally have more capacity to run complex treatment systems and can reduce phosphorus loading more economically. This watershed approach allows control of phosphorus using economies of scale and achieves more efficient and economical reductions. Out of a total of 80 watersheds statewide, 17 phosphorus watershed reviews are complete, an additional 12 are in progress and 10 have updates pending.

The following municipal WWTPs received phosphorus limits in 2016:

- Becker WWTP
- Chisago Lakes Joint Sewage Treatment Commission
- · Cokato WWTP
- Delft Sanitary District WWTP

- Greenfield WWTP
- · Hanska WWTP
- Little Falls WWTP
- · Madelia WWTP
- Northrop WWTP
- · Otsego East WWTP
- Riverbend Mobile Home Park WWTP
- Shafer WWTP
- · Western Lake Superior Sanitary District
- Winsted WWTP

Innovative approaches

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

Regulatory certainty

Municipal and industrial wastewater treatment facility managers have expressed frustration with the rapid pace of change in discharge permit requirements in recent years. There has been particular concern about permit requirements for removal of nutrients, namely phosphorus and nitrogen. In addition, nitrogen concentrations have been increasing in Minnesota streams over several decades, and can negatively affect drinking water sources. Nitrogen has been identified as the primary pollutant responsible for a recurring dissolved oxygen deficiency in the Gulf of Mexico which is commonly referred to as a "dead zone" and attributed to pollutant loading from the entire Mississippi River Basin, including Minnesota. <u>Minnesota's 2014 Nutrient Reduction Strategy</u> includes a 45% nitrogen loading reduction goal for the Mississippi River by the year 2040.

A collaborative effort between MPCA and interested parties culminated in the legislative adoption of <u>Minnesota Statutes 2016</u>, <u>section 115.426</u>, titled "Incentive for Voluntary Municipal or Industrial Investment in Nutrient Treatment Technology" and colloquially known as "Regulatory Certainty". The law provides an incentive for regulated wastewater treatment facilities to voluntarily install nitrogen treatment technology in exchange for a guarantee that nitrogen and phosphorus removal requirements will remain unchanged for a period of up to twenty years or for the useful life of the new treatment technology, whichever comes first.

Regulatory Certainty is available for facilities that agree to install and operate Biological Nutrient Removal treatment, a technology that is capable of providing treatment for both nitrogen and phosphorus. New permit limits are requiring many facilities to increase their phosphorus removal capabilities. At the same time, many existing facilities, built in the 1970's and 1980's, are reaching the end of their useful life and are in need of upgrade or replacement. This is expected to result in many facility upgrades in the coming years. Given that nitrogen reduction requirements are expected in coming years, upgrading to treatment technology that reduces both phosphorus and nitrogen will be an efficient strategy and it makes sense to incentivize such actions.

Regulatory Certainty is expected to result in early adoption of nitrogen removal technology in some communities, provide a predictable long-term performance level for wastewater treatment facility operators, and to minimize the need for multiple wastewater treatment facility upgrades to address

phosphorus and nitrogen separately in the coming years. MPCA also engaged a working group of stakeholders – including municipal wastewater operators, directors of public works, and environmental advocacy, municipal advocacy, and municipal utility advocacy representatives – to direct and shape the implementation of this program

Municipal liaison and economist

During the 2015 legislative session, MPCA received funding for a municipal liaison. The position was filled in December 2015. The primary role of the liaison, Joel Peck, is 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. Joel's work is two-way: informing and assisting municipalities, and advocating for municipalities within MPCA. As detailed in the final section of this report, Joel is the person to contact if a citizen or city has questions or would like to make comments on this report.

His 2016 outreach has been very successful and illustrated the usefulness of the position. In addition to participating in the listening sessions noted below and coordinating group web meetings, Joel made personal visits to 30 facilities in 2016, with the goal of:

- · Opening new communication channels
- Promoting financing options
- · Discussing items of concern (i.e. effluent limits, permit reissuance, etc.)
- Representing concerns of municipalities within the agency
- · Providing resources for technical concerns

The 2015 Legislature also provided funding for a new MPCA environmental economist. The addition of this position has enhanced our ability to perform economic analyses related to regulatory and policy activities for water quality protection. The position has contributed to many important projects, including the preliminary development of variance tools.

Permit listening sessions

In October 2016, MPCA staff held sessions for municipal wastewater discharge permit holders in Marshall, Detroit Lakes, Duluth, Brainerd, Rochester, and St. Paul. Key to what we heard from these wastewater professionals were the need for more communication, more technology and more user-friendly permits. About 100 people total attended the sessions and the comments heard fall into these major themes:

MPCA needs to communicate more

Permit holders feel that MPCA needs to communicate more. For example, permit holders are looking for more information about:

- How water quality standards are developed, how standards protect resources and uses, and how people can get involved in that process.
- The MPCA's switch to a new database and impact to the format of hard copy permits. One permit holder said, "The look of the new permit was a shock."
- · Status of permit applications, reviews, and reissuance
- · Water quality trading
- Regulatory certainty program
- Chloride water quality standard and impact to cities

Relatedly, permit holders said the agency needs to be more approachable. Otherwise discussions become "...like arguing with the state trooper standing outside your car window," to quote one permit holder.

MPCA needs to use more current and reliable technology

Technology is an important issue. Permit holders asked that MPCA:

- Allow online permit applications, or at least provide a permit holder's last application that can simply be updated.
- Provide an online tracking system of the permit application process.
- Fix problems with eDMRs.

Cities want more time to review and discuss draft permits, both among city personnel and elected officials and with MPCA staff. This time is necessary, even if that means going beyond the 150-day goal to issue permits. They also asked the MPCA to start dialogue with the city much earlier in the reissuance process. "If 150 days is a target, I'd like to take 180 days and do it right the first time," said one community representative.

MPCA needs to make it easier to comply

Permit holders asked MPCA to think about the operators. These are the people pushing the buttons, turning the valves and opening the gates. Compliance starts with them." To help with this, they suggested that MPCA:

- Make permits more user-friendly.
- Include a check-list to help operators keep track of due dates and monitoring requirements.
- Keep in mind cities' budgeting requirements when setting limits that require major changes in operation and/or facilities.

Representatives from point sources feel they are doing the bulk of lake and stream cleanup work. "When is agriculture going to have to do its share? Let's go to where the problem is," said one community representative. They also asked MPCA to do more to highlight the positive impact on water quality from wastewater treatment facilities.

What we're doing

MPCA staff are meeting to discuss the comments heard and set priorities for the next steps to take. Actions already taken include:

- · Changing some of the confusing questions on eDMRs, such as "Yes, there is no discharge."
- Worked with EPA to align cropping cycles to aid biosolids reporting.
- Planning more frequent On Point newsletters in order to communicate about changes and topics that attendees wanted to hear more about.
- Planning a question and answer session at the annual wastewater conference (see below).
- The agency is hosting a seventh listening session on the Iron Range January 10, 2017.

MPCA is planning to take the following steps to satisfy the need for better communication:

- The MPCA compiled all the notes from the listening sessions and emailed them to participants who provided addresses.
- The MPCA will continue to communicate about changes made as a result of the sessions via On Point.

Community wastewater infrastructure improvement assistance

In 2016, the Municipal Wastewater Program, in partnership with others, coordinated about \$170 million in financial assistance to 78 wastewater treatment facility infrastructure improvement projects

statewide, benefiting water quality across Minnesota. Partners included the Public Facilities Authority (through Clean Water Revolving Fund, Wastewater Infrastructure Fund, Clean Water Legacy Fund programs), United States Department of Agriculture Rural Development Program, Board of Water and Soil Resources and the Iron Range Resources and Rehabilitation Board. An example of the benefit of this work, is the estimated reduction of 13,730 lbs./year of total phosphorous (TP) being discharged to the Mississippi River and ultimately to Lake Pepin.

Streamlined wastewater chemical additive review and approval procedures

Each year MPCA receives about 75 proposals for chemical additives to be used in wastewater treatment systems. Chemical additives are reviewed to prevent unintended environmental consequences associated with their use. Timely and predictable outcomes of these reviews are critical to cities and industries proposing to use chemical additives to improve water quality protection or meet production goals. Historically the review and approval process has taken one to three months. Since an improvement project was completed in May 2016, 87% of chemical additive approvals were completed in less than five days. Creative electronic tool development and customer input were key in this accomplishment.

River eutrophication standard limits development

As explained above, MPCA considers the need for phosphorus discharge limits using a watershed approach. This approach is both protective of water quality and minimizes costly upgrades at smaller treatment plants. For example, the city of Welcome WWTP permit reissued in 2015 includes a TP limit based on river eutrophication standard. 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 a broader watershed approach and the amount of time it will take facilities to come into compliance.

A public meeting was held February 11, 2016 to explain the procedures for implementing river eutrophication standards. The meeting was webcast to reach interested parties in greater Minnesota. The MPCA worked to include professional engineers (from cities and consulting firms), WWTP contacts, other non-governmental stakeholders, EPA Region 5 and surrounding states.

Water quality variances

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, under certain conditions, additional time to meet the applicable standard. Conditions may include the cost of treatment or the impact on residents, which may prevent the permittee from complying with a discharge limit in the foreseeable future. Variances are one permitting tool that allow for that extra time. EPA must review and approve variances granted by the states. A revision to Minnesota's rules governing water quality variances was completed October 24, 2016. The changes will allow MPCA to maintain consistency in the variance process and align with federal requirements. The rules will bring more 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. With rulemaking complete, MPCA hopes to develop templates to assist municipal facilities in determining whether a variance would apply to them without undergoing the cost of hiring a consultant. Updates on this continuing work can be found at https://www.pca.state.mn.us/water/water-quality-variance.

Municipal treatment of sulfate and salty parameters

MPCA has received \$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 funds have yet to be distributed. The need to understand treatment options for salty parameters is timely. The MPCA is in the process of updating water quality standards (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 be upgraded 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. Preliminary results are planned for end of 2017; the project will be completed by May 31, 2018.

Chloride working group

MPCA has engaged a working group of municipal managers, wastewater operators, and engineering consultants to develop an NPDES permitting strategy to direct the agency's approach to implementing the existing chloride water quality standard. The direction for this group is to determine the statewide chloride permitting strategy. Work began in December 2016, and has continued into 2017.

Wastewater Think Tank

The 2013 Legislature provided funding for two parallel efforts:

- 1. 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 Minnesota Wastewater Think Tank included wastewater experts not just from Minnesota, but from around the country. The goal of the Think Tank was 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 were identified and different potential solutions examined. The group spent two days visiting a number of treatment plants in the State of Virginia's Hampton Roads Sanitation District, where unique treatment technologies are being used to provide advanced nutrient removal. A final report has been produced summarizing the issues 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 examined chemical addition and membrane filtration to achieve low levels of phosphorus in the effluent. St. Cloud's project examined the potential for mining struvite from the bio solids system, resulting in less phosphorus in the effluent. Struvite is a precipitant of magnesium ammonium phosphate that causes operational problems in the bio solids system. Windom's project examined the effluent. Final reports for all projects were submitted June 30, 2016 and are available from the MPCA.

Summary of water quality standards development

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 to 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. EPA then has final authority to approve or disapprove the WQS.

To convey the breadth and status of this work, the MPCA developed an Inventory of standards efforts (<u>https://www.pca.state.mn.us/sites/default/files/wq-s6-35.pdf</u>). The Inventory groups water quality standards projects by rulemaking status and priority, and provides a summary of project status. In 2015, the Inventory was modified slightly to comply with Session Law (Laws of Minnesota 2015, 1st Spec. Sess. chapter 150, article 4, section 100); and is now updated each year by December 15.

Activities in 2016

As noted in the Inventory, in 2016 two water quality standards projects were adopted into Minnesota rule: water quality variances and antidegradation. Some other water quality standards projects moved forward in 2016 (Tiered Aquatic Life Use [TALU]), while others did not. Economic analysis of water quality standards projects is conducted throughout rulemaking, and is formally documented in the Statement of Need and Reasonableness (SONAR). The SONARs for these completed WQS projects can be found on the webpages referenced in the first column of the Inventory.

Activities anticipated in 2017 to 2019

In 2017, water quality standards and rulemaking activities are expected to focus on three projects that are in rulemaking but are not yet complete:

- Use classification changes for specific water bodies.
- Modifications to the existing sulfate standard for protection of wild rice.
- Revision to and updates of existing Class 3 and Class 4 use designations and standards.

Other standards development and water quality rulemaking activities for 2017, 2018, and 2019 will be identified and prioritized in the first half of 2017, through a process known as the triennial standards review (TSR). Through the TSR, MPCA reviews the need for WQS revisions, amendments and additions, and identifies WQS projects that are priorities for the upcoming three-year period. An important part of the TSR is the public's input on WQS needs and priorities. The TSR ensures the public has an opportunity to comment on any aspect of Minnesota's water quality standards at least once every three years.

The TSR includes a public hearing anyone may attend and a public comment period. When the public comment period ends, the MPCA considers the comments it received, the needs of permittees and MPCA programs, the environmental and public health benefits expected from promulgation of the WQS, the availability of new science and EPA mandates to prepare a list of WQS priorities for the next three years.

It is important to note that the TSR is primarily a review and prioritization of WQS needs. While one might expect that development and promulgation of WQS projects would proceed in order of priority, in practice there are many factors that can prevent or delay development of a WQS project. Consequently, WQS projects are developed and promulgated into rule as they are ready. The Inventory provides the priority of a WQS project, its progress relative to rulemaking, and its current status (making progress, no progress, or on hold).

Once a WQS project is in rulemaking, the MPCA develops a webpage for the WQS project to share documents detailing the scientific analysis for the WQS and its rulemaking timeline.

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

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:

- In December 2016, the MPCA engaged a working group of municipal managers, wastewater operators, and engineering consultants to develop a statewide NPDES/SDS permitting strategy to direct the permitting process when the chloride water quality standard exceeded. This group will be presenting the final statewide NPDES/SDS chloride permitting strategy to any interested party via a webcast and then finally presenting it to the MPCA Advisory Committee. The goal is to have a statewide NPDES/SDS chloride permitting strategy by mid-2017.
- MPCA is continuing 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 is intended to match the protection to the actual uses of the receiving waters. 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, the water body may not need to be specifically protected for this use. Implementation is still being considered and a public notice on the rule changes are planned soon.
- MPCA continues to implement its new permitting database, Tempo.
- MPCA will be exploring, expedited variance options for other pollutants in addition to chloride.

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 statement of need and reasonableness (required under Section 14.131).

There are a number of opportunities for Permittee's to become involved in the permitting process for their facility. Throughout the permitting process the MPCA contacts the Permittee if a new limit is assigned and requests information regarding the actions that need to be taken and the timeframe for compliance. The information that the Permittee sends back to the MPCA is used to develop the compliance schedule in the permit. After the permit is drafted the MPCA sends the Permittee a copy of the permit to review and comment on prior to placement on public notice. Finally, the permit is placed on public noticed for 30 days before final issuance.

The easiest way to stay current with WQS development and adoption is to sign up for GovDelivery notices on the MPCA's WQS webpage: <u>http://www.pca.state.mn.us/qzqh1081</u>. Opportunities for public input on WQS occur with adoption of standards into Minnesota rule, and with 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: <u>http://www.pca.state.mn.us/index.php/view-document.html?gid=16321.</u>

Municipal needs covered in this report and chances for input

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 2017 report. Please submit comments to Joel Peck. He can be reached at 651-757-2202 or joel.peck@state.mn.us.